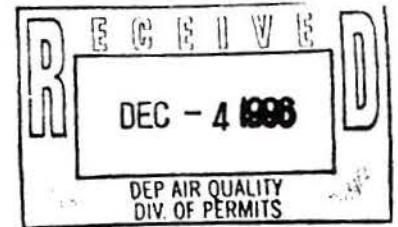


*EPA*

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY



OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.:	<u>OP-59-0008</u>	Source &	<u>leather manufacturing facility</u>
Owner:	<u>Westfield Tanning Company</u>	Air	_____
	_____	Cleaning	_____
Address:	<u>360 Church Street</u>	Device:	_____
	<u>Westfield, PA 16950</u>		_____
Attn:	<u>Keith Kraus</u>	Location:	<u>Westfield Borough</u>
	<u>Manager of Manufacturing</u>		<u>Tioga County</u>

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning device(s) are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
  - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

See attached for additional conditions.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: NOV 27 1996

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cc: Harrisburg  
Mansfield  
File

*[Signature]*  
Environmental Program Manager

Office of Air Quality  
Control & Health Services  
Harrisburg (SAFEL)

JAN 29 1997

EPA, REGION III

*only back and forth*

PERMIT CONDITIONS  
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COMPANY: Westfield Tanning Company

4. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the provisions of Title I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following sources:
- a. Leather tanning operation consisting of the following:
    - tanning solutions prep room
    - tanning solutions storage tank
    - tanning vats
  - b. Leather waterproofing operation consisting of the following:
    - one 165 gallon custom designed leather dip tank (Tank 1) one 165 gallon custom designed heated leather dip tank (Tank 2) one 165 gallon custom designed leather dip tank (Tank 3) one 165 gallon custom designed leather dip tank (Tank 4) one 135 gallon custom designed leather dip tank (Tank 5) one 475 gallon custom designed leather dip tank (Tank 6) one leather drying room
  - c. Combustion sources consisting of two 750 horsepower natural gas/No. 2 fuel oil fired ,Johnson boilers.
  - d. Degreasing operations consisting of three Safety Kleen degreasing sinks.
  - e. Gasoline storage consisting of a 250 gallon capacity horizontal vessel.
  - f. Kerosene cleaning of the leather splitting blades.
  - g. Sponge solution fungicide leather treatment.

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5. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the maximum volatile organic compound (VOC) emissions from the leather tanning operation referenced in condition 4a herein shall never exceed 11.4 tons in any 12 consecutive month period (as determined by the Department).
6. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall provide training to all employees involved in the handling of VOC-containing materials associated with the leather tanning operation referenced in condition 4a herein. The training shall, at a minimum, address the topics of volatile organic compound emission minimization techniques and good housekeeping practices.
7. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 and the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the maximum volatile organic compound (VOC) emissions from the leather waterproofing operation referenced in condition 4b herein shall never exceed 55 tons in any 12 consecutive month period (as determined by the Department).
8. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 and the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, all materials (dipping compounds, diluents, etc.) added to each waterproofing dip tank referenced in condition 4b herein shall contain (in aggregate) no more than 5.5 pounds of volatile organic compounds per gallon. Compliance with this condition shall be determined based on a quarterly average volatile organic content to be calculated based on all material additions to each tank in a given calendar quarter.
9. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 and the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, all dip tanks identified in condition 4b herein shall be kept closed when not in actual use.
10. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 and the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall provide training to all employees involved in the waterproofing operation referenced in condition 4b herein. The training shall, at a minimum, address the topics of volatile organic compound emission minimization techniques and good housekeeping practices.



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11. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 and the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the wetting of cleaning rags associated with the waterproofing operation identified in condition 4b herein shall be done via the use of closed top cleanup solvent plunger cans. Additionally, no waste cleanup solvents (either in bulk or remaining in used cleanup rags) shall be disposed of via evaporation.
12. Pursuant to the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, under no circumstances shall any dipping compounds, diluents or cleanup solvents containing methylene chloride or formaldehyde be used in the waterproofing operation identified in condition 4b herein. Additionally, the only dipping compound, diluent or cleanup solvent associated with the waterproofing operation identified in condition 4b herein to contain 1,1,1-trichloroethane shall be Outsole Oil 93x558.
13. The potential to emit volatile organic compounds from each of the source categories identified in conditions 4c, 4d, 4e, 4f and 4g herein shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year (as determined by the Department). Should any of these limitations ever be exceeded for any of the source categories referenced above, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source contained in the respective source category.
14. The company shall maintain comprehensive, accurate records for the leather tanning operation referenced in condition 4a herein in accordance with Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection which, at a minimum, shall include monthly usage records for all VOC-containing materials associated with the tanning operation. These records shall be retained for a minimum of two years and shall be made available to the Department upon request. The Department reserves the right to expand the list contained in this condition.
15. The company shall maintain comprehensive, accurate records for the leather waterproofing operation referenced in condition 4b herein in accordance with Section 129.95 of Chapter 129 and the Best Available Technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection which, at a minimum, shall include the following with respect to each waterproofing dip tank incorporated in the waterproofing operation to which diluents (thinners, reducers, etc.) and/or any other volatile organic compound containing material (other than dipping compounds) are added:
  - the types and amounts of dipping compounds added to each dip tank and the dates of addition,

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- the types and amounts of any diluents (thinners, reducers, etc.) and/or other volatile organic compound-containing materials added to each dip tank and the dates of addition.

For each waterproofing dip tank incorporated in the waterproofing operation to which only a dipping compound is added, the company shall maintain records of the type and amounts of dipping compound added to the tank.

In addition, the company shall also maintain separate records of all cleanup solvents used in the waterproofing operation referenced in condition 4b herein.

The records generated for each calendar quarter shall be submitted to the Department by no later than the thirtieth day of the month following the respective calendar quarter (report is due April 30, July 30, October 30 and January 30).

16. The company shall maintain comprehensive, accurate records for all sources identified in conditions 4c, 4d, 4e, 4f and 4g herein in accordance with Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection which, at a minimum, shall include the following:

- the amounts of natural gas and No. 2 fuel oil used per calendar year in each of the boilers identified in condition 4c herein
- the amount of degreasing solvent used and the amount of spent degreasing solvent shipped offsite as liquid hazardous waste per calendar year associated with the degreasing sinks identified in condition 4d herein
- the amount of gasoline stored per calendar year in the gasoline storage tank identified in condition 4e herein
- the amount of kerosene used per calendar year for cleaning of the leather splitting blades identified in condition 4f herein
- the amount of sponge solution fungicide used per calendar year in the leather treatment operation identified in condition 4g herein.

The company shall retain these records onsite for at least 2 years and shall make these records available to the Department upon request.

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*Conditions 18 through 21 herein pertain to the two Johnson 750 horsepower natural gas/No. 2 fuel oil fired boilers identified in condition 4c herein which previously operated pursuant to Operating Permit #59-302-01 4A (which is hereby being superseded by the issuance of this RA CT operating permit).*

18. The boilers are to be fired only on gas (natural or LP) or #2 fuel oil to which there has been no reclaimed or waste oil or other waste materials added. Additionally, the sulfur content of the #2 oil fired in these boilers shall not, at any time, exceed 0.5% (by weight).
19. The company shall, upon Department request, provide fuel analyses or fuel samples of the fuel used in the aforementioned boilers.