ILLINOIS POLLUTION CONTROL BOARD
February 20, 2003

IN THE MATTER OF:	)	
	)	
PROPOSED HORWEEN LEATHER	)	R02-20
COMPANY SITE-SPECIFIC AIR RULE,	)	(Site–Specific
35 ILL. ADM.CODE 218.112 and 218.929	)	Rulemaking - Air)

Adopted Rule. Final Order.

OPINION AND ORDER OF THE BOARD (by M.E. Tristano):

This matter comes before the Board upon a proposal to amend the Board's air quality regulations for organic material emissions in the Chicago area. The proposal was filed by the Horween Leather Company (Horween). Horween requests that the Board issue a site-specific rule from 35 Ill. Adm. Code 218.112 and add a new section 218.929 to change the volatile organic material (VOM) control requirements as applied to a small amount of new specialty leathers that Horween plans to produce at its facility located at 2015 North Elston Avenue, Chicago, Cook County. The requested rule change would allow Horween to continue to produce its existing specialty leather pursuant to existing regulations, and develop new specialty leather products in compliance with the modified regulation.

By today's action the Board adopts the proposed amendments. The rules adopted here are unchanged from those adopted in the Board's first-notice and second-notice opinion and order. On December 5, 2002, the Board proposed the rulemaking for second notice. The Board directed that the rule be submitted to the Joint Committee on Administrative Rules (JCAR) for second-notice review. On February 4, 2003, JCAR issued a certification of no objection to the rule. The following opinion will explain the procedural history, proposal development, proposal overview, and discuss economic considerations.

PROCEDURAL HISTORY

Horween filed its proposal for rulemaking on February 19, 2002. By order of March 7, 2002, the Board accepted the proposal for hearing. On March 10, 2002, the Board mailed a request to the Department of Commerce and Community Affairs (DCCA) to perform an economic impact study on the proposed rulemaking. DCCA did not prepare an economic impact study, and no questions were raised or comments were made on that issue at hearing or during the first-notice comment period.

A public hearing was held before Hearing Officer William Murphy in Chicago on June 26, 2002. Horween presented the testimony of Mr. Arnold Horween III and Julie M. Christensen, Director of Safety and Environmental Compliance. The Illinois Environmental Protection Agency (Agency) presented the testimony of Mr. Gary E. Beckstead, Environmental Protection Engineer.

Prior to testimony, Horween through its attorney Mr. Roy Harsch, acknowledged that the Agency had rewritten the site-specific proposal submitted in February. Horween concurred with the Agency revision with two exceptions and subsequently offered a joint motion for its substitution for Horween's original draft. Joint Motion.

The Board entered its first notice opinion and order on August 8, 2002. The first-notice publication of the rules appeared in 26 *Illinois Register* 13772 (Sept. 20, 2002). No public comments were received during the first-notice comment period, which ended November 4, 2002. On December 5, 2002, the Board proposed the rulemaking for second notice.

BACKGROUND

Horween submitted a petition for relief from technical restraints associated with making new types of specialty leather. The production requirements of leather that use higher solvent-based finishes were the subject of Illinois' original adoption of amendments to the generally applicable Reasonably Available Control Technology (RACT) leather coating rule (35 Ill.Adm. Code 218.926 and 211.6170).

In 1994, the Board, after thoroughly evaluating the required production need of specialty leathers with a high grease, wax, and oil content, adopted a special subcategory for this "specialty leather." 35 Ill. Adm. Code 218.926 and 211.6170. The Board rule allows emission of VOM in the amount of 38 pounds (lbs.) per 1,000 square feet and further provides an exemption for the stains used on leather. 35 Ill. Adm. Code 218.96. Furthermore, the rule specifically defines "specialty leather." 35 Ill. Adm. Code 211.6170. This particular rule was approved by the United States Environmental Protection Agency (USEPA) and included in the Illinois State Implementation Plan (SIP). 59 Fed. Reg. 46567 (Oct. 11, 1994).

Horween has identified two types of what it believes to be other "specialty leathers" that do not meet the current definition under 35 Ill. Adm. Code 211.6170. The first group of leathers includes a minor change to Horween's existing CHROMEXCEL specialty leather. The second group, performance leathers, includes leather previously made by a closed tannery. This leather is referred to by Horween as "GENTRY." The Agency's revision to the proposed site-specific rule utilizes a more generic approach and does not specify particular names for the new leathers Horween is planning to coat. Tr. at 59. By utilizing a generic approach, a new site-specific regulation would not need filing each time the fashion emphasis changes in the leather industry. Tr. at 59.

Horween evaluated the existing RACT rules to review potential impacts on future environmental compliance should these new products be produced. Consequently, Horween realized that, they would not be able to put these new leathers into production and continue to comply with the existing Illinois RACT rules. Horween maintains that even though the production of the newly proposed products cannot meet the current RACT rules, there is a negligible environmental impact from producing these new products. The production of the new specialty leathers at this facility will replace production that has been lost since 1995 and would not exceed the VOM emissions from 1995 with an additional 20 ton per year (TPY) cap on these new specialty leathers. Furthermore, Horween maintains it would not exceed current emission

limits already in place in the facility's Title V permit and Emissions Reduction Market System (ERMS) baseline.

PROPOSAL OVERVIEW

Section 218.929 - Cementable and Dress or Performance Shoe Leathers

Horween has proposed adding Section 218.929 to the Board's Organic Material Emission Standards and Limitations for the Chicago Area that sets forth the specific requirements applicable to certain other specialty leathers outlined within the Section caption. The Agency has suggested some revisions that are generally agreeable to both parties.

Section 218.929(a) outlines a number of criteria which must be met. Subsection (a) sets forth:

1) The applicability of the rule that limits all exemptions and volume emission modification to Horween's leather manufacturing facility located at 2015 North Elston Avenue, Chicago, Illinois;

2) VOM emission limits for production of cementable shoe leather with a percent content of wax, grease, polymer and oils between 12 and 25% by weight that cannot meet the definition of specialty leathers of 35 Ill. Adm. Code 211.6170;

3) VOM emission limits for production of dress or performance shoe leather finished with water emulsified coating materials that cannot meet the definition of 35 Ill. Adm. Code 211.6170; and

4) No exemption from the annual 10-ton VOM cap applicable to stains pursuant to Section 218.926(b)(2)(i).

Section 218.929(b) provides numeric limitations on emissions from the production of the new leather products. They are 14 lbs. VOM/1,000 square feet for non-water resistant leathers; 24 lbs. VOM/1,000 square feet of leather produced for water resistant leather; and a total annual VOM emission limit of 20 tons.

Section 218.929(c) requires compliance with the company's approved standard operating and maintenance procedures (SOMP).

Section 218.929(d) outlines reporting and record keeping requirements which are consistent with the Subpart and Section 39.5 of the Act (415 ILCS 5/39.5) and allows for use of an equivalent alternative plan if approved by the Agency and the USEPA.

Section 218.112(a)(26) also incorporates by reference ASTM D2099-00 Standard Test Method for Dynamic Water Resistance of Shoe Upper Leather by the Maeser Water Penetration Tester as referenced in 218.929(b)(1).

Horween agreed with the Agency revisions to the proposed rulemaking with two exceptions: (1) the use of high volume low pressure spray guns; and (2) the requirement to record and report VOM content and gallons of all coatings by category and by batch.

THE USE OF HIGH VOLUME LOW PRESSURE SPRAY GUNS

To be consistent with the full RACT provisions as approved by USEPA for the Maine facility, the Agency proposed specific language at Section 218.929(c)(4) which would require Horween to either convert to HVLP spray guns or document the lack of feasibility or cost effectiveness for its conversion to the USEPA. Section 218.929(c)(4) sets forth:

> A procedure to install and use high volume low pressure (HVLP) spray guns for the coating of these leathers within one-year after USEPA approves this rule as a SIP revision or the Company shall document why HVLP spray guns are not a technically feasible or cost-effective method for applying coating at this facility.

The Agency, through the testimony of Mr. Beckstead, offered that Horween did not provide sufficient documentation in support of its assertion that they cannot use HVLP spray guns in their operation. Tr. at 61. Horween argues that Section 172(c)(1) of the Clean Air Act, 42 U.S.C. 7505(c)(1)(2000), requires that the State Implementation Plans (SIP) for non-attainment areas provide for the implementation of reasonably available control measures (RACM) including emission reductions obtained through the adoption of RACT. The USEPA has historically defined RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. *See* 44 Fed. Reg. 53762 (Sept. 17, 1979). By regulation, the Pollution Control Board has adopted the USEPA's historical definition of RACT. *See* 35 Ill. Adm. Code 211.5370.

Further, Mr. Horween testified that a brief test was conducted using the HVLP spray guns suggested by the Agency. Tr. at 65. The results indicated that the specialty leather produced would not be of sufficient quality to satisfy customer requirements. Mr. Horween also indicated that the use of the HVLP spray guns would cause the specialty leather to become a different product which customers would not purchase. Tr. at 66-69. Mr. Beckstead conceded that the spray technology recommended by the Agency for testing by Horween currently did not meet the criteria for HVLP spray guns listed in 211.2990 but that the manufacturer would like to have it classified as such. Tr. at 63-65.

Based upon the evidence presented, the Board finds that HVLP spray guns are not technically feasible for the specific Horween Company production of specialty leather allowed by this site-specific rulemaking. As the Agency's suggested amendment fails to meet the RACT criteria for technological and economic feasibility contained within 35 Ill. Adm. Code 211.5370, the Board has removed the corresponding language at Section 218.929(c)(4) from the proposed rule.

THE REQUIREMENT TO RECORD AND REPORT VOM CONTENT AND GALLONS OF ALL COATINGS BY CATEGORY AND BY BATCH

The current record keeping requirements for application of coatings to specialty leather require VOM emissions to be tracked by category of leather produced. 35 Ill. Adm. Code 218.926(b)(2)(B). Equivalent alternative control plans may be used if approved by the Agency and USEPA in a federally enforceable permit or as a SIP revision. 35 Ill. Adm. Code 218.926(c). Horween's current specialty leather production does use an alternative plan. The alternative plan was submitted in 1996 and approved by the Agency and USEPA. Tr. at 34.

Horween proposes to continue its alternative record keeping practices in this manner for the new categories of leather proposed in this rulemaking. Tr. at 24-25. Horween proposes to record the total amount of VOM-containing material "used in a month and divide it amongst the production of standard leather." Tr. at 75. Using a percentage based on the square footage of each category of leather produced in that month, the VOM emissions produced from each category are estimated. Tr. at 75.

The Agency proposed specific language which would require Horween instead to report and record VOM content, gallons, and pounds of coatings by each batch of leather manufactured during each month. The Agency did so based on USEPA's indication that in light of the additional categories of leathers, dress or performance water-resistant, dress or performance non-water-resistant, cementable water-resistant, and cementable non-water-resistant, that the current procedures were not adequate to verify compliance. Horween objects to the Agency's proposed record keeping and reporting requirements, arguing that the existing system which Horween uses is adequate and has been accepted by both the Agency and USEPA. Horween argues that under the Agency's proposal there would be a substantial modification to the record keeping and reporting procedures that it already follows. Tr. at 33, 37, 60, 61.

Further, Horween maintains that a substantial increase in record keeping would be required by a batch recording system for a relatively limited amount of VOM compounds and maximum actual emissions for those compounds per year. Tr. at 73, 79-80. Horween points out that only two compounds are used on multiple types of leathers manufactured at the facility, eukesolar dyes and unithane 9107. Tr. at 79-80.

By allowing modification of the finish formulation in this rulemaking, the ability of Agency and USEPA field inspectors to verify Horween's monthly estimates of all VOM containing materials used for each of the new categories of specialty leather becomes of increasing importance. The Agency's suggest record keeping requirements "by batch" would assist in this effort. To the extent that other means may be used to reach this goal of demonstrating compliance, the Agency's suggested wording at 218.929(d)(3) provides Horween the opportunity to propose alternative record keeping procedures to the Agency and USEPA for approval. Tr. at 60. This is consistent with the Board's current specialty leather provisions where the Board has designated that alternative plans are to be approved by the Agency and the USEPA. 35 Ill. Adm. Code 218.926(c).

The Board finds that the Agency's request to record and report VOM content and gallons of all coatings by category and by batch are acceptable and will be included.

ECONOMIC IMPACT

The impetus for the Horween proposal is that the adoption of the amendments would have a beneficial economic impact by allowing them to compete in additional specialty leather markets. Horween has experienced a significant loss in revenue over the last ten years from sales of $32 million to $20 million. Tr. at 124-25. They have decreased employment from almost 200 employees in 1992 to about 140 employees at present. Tr. at 125. The anticipated increase in sales associated with production of specialty leathers permitted by this site-specific rule is $2 to $2.5 million per year. Tr. at 125.

CONCLUSION

Based on the record developed to date in this matter, the Board finds that adoption of the following amendments, as requested by Horween and modified by the Illinois Environmental Protection Agency, with the exclusion of the Agency's proposal for the HVLP spray gun is appropriate.

ORDER

The Board directs the Clerk to file the following adopted rule with the Secretary of State for publication in the *Illinois Register* for final notice and adoption in the Illinois Administrative Code.

TITLE 35: ENVIRONMENTAL PROTECTION
SUBTITLE B: AIR POLLUTION
CHAPTER I: POLLUTION CONTROL BOARD
SUBCHAPTER c: EMISSIONS STANDARDS AND
LIMITATIONS FOR STATIONARY SOURCES

PART 218
ORGANIC MATERIAL EMISSION STANDARDS AND
LIMITATIONS FOR THE CHICAGO AREA

SUBPART A: GENERAL PROVISIONS

Section
218.100 Introduction
218.101 Savings Clause
218.102 Abbreviations and Conversion Factors
218.103 Applicability
218.104 Definitions
218.105 Test Methods and Procedures
218.106 Compliance Dates
218.107 Operation of Afterburners

SUBPART B: ORGANIC EMISSIONS FROM STORAGE AND LOADING OPERATIONS

SUBPART C: ORGANIC EMISSIONS FROM MISCELLANEOUS EQUIPMENT

SUBPART E: SOLVENT CLEANING

SUBPART F: COATING OPERATIONS

SUBPART G: USE OF ORGANIC MATERIAL

SUBPART H: PRINTING AND PUBLISHING

SUBPART Q: SYNTHETIC ORGANIC CHEMICAL AND POLYMER MANUFACTURING PLANT

SUBPART R: PETROLEUM REFINING AND RELATED INDUSTRIES; ASPHALT MATERIALS

SUBPART S: RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS

SUBPART T: PHARMACEUTICAL MANUFACTURING

SUBPART V: BATCH OPERATIONS AND AIR OXIDATION PROCESSES

SUBPART W: AGRICULTURE

SUBPART X: CONSTRUCTION

SUBPART Y: GASOLINE DISTRIBUTION

SUBPART Z: DRY CLEANERS

SUBPART AA: PAINT AND INK MANUFACTURING

SUBPART BB: POLYSTYRENE PLANTS

SUBPART CC: POLYESTER RESIN PRODUCT MANUFACTURING PROCESS

SUBPART DD: AEROSOL CAN FILLING

SUBPART FF: BAKERY OVENS (REPEALED)

SUBPART GG: MARINE TERMINALS

SUBPART HH: MOTOR VEHICLE REFINISHING

SUBPART PP: MISCELLANEOUS FABRICATED PRODUCT MANUFACTURING PROCESSES

SUBPART QQ: MISCELLANEOUS FORMULATION MANUFACTURING PROCESSES

SUBPART RR: MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING PROCESSES

SUBPART TT: OTHER EMISSION UNITS

SUBPART UU: RECORDKEEPING AND REPORTING

Section 218.Appendix H: Baseline VOM Content Limitations for Subpart F, Section 218.212 Cross-Line Averaging Units

AUTHORITY: Implementing Section 10 and authorized by Section 28.5 of the Environmental Protection Act [415 ILCS 5/10 and 28.5].

SOURCE: Adopted at R91-7 at 15 Ill. Reg. 12231, effective August 16, 1991; amended in R91-24 at 16 Ill. Reg. 13564, effective August 24, 1992; amended in R91-28 and R91-30 at 16 Ill. Reg. 13864, effective August 24, 1992; amended in R93-9 at 17 Ill. Reg. 16636, effective September 27, 1993; amended in R93-14 at 18 Ill. Reg. at 1945, effective January 24, 1994; amended in R94-12 at 18 Ill. Reg. at 14973, effective September 21, 1994; amended in R94-15 at 18 Ill. Reg. 16392, effective October 25, 1994; amended in R94-16 at 18 Ill. Reg. 16950, effective November 15, 1994; amended in R94-21, R94-31 and R94-32 at 19 Ill. Reg. 6848, effective May 9, 1995; amended in R94-33 at 19 Ill. Reg. 7359, effective May 22, 1995; amended in R96-13 at 20 Ill. Reg. 14428, effective October 17, 1996; amended in R97-24 at 21 Ill. Reg. 7708, effective June 9, 1997; amended in R97-31 at 22 Ill. Reg. 3556, effective February 2, 1998; amended in R98-16 at 22 Ill. Reg. 14282, effective July 16, 1998; amended in R02-20, at_____Ill. Reg____, effective_____.

BOARD NOTE: This Part implements the Environmental Protection Act as of July 1, 1994.

Section 218.112 Incorporations by Reference

The following materials are incorporated by reference and do not contain any subsequent additions or amendments.

a) American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103:
   1) ASTM D2879-86
   2) ASTM D323-82
   3) ASTM D86-82
   4) ASTM D-369-69 (1971)
   5) ASTM D-396-69
   6) ASTM D2880-71
   7) ASTM D-975-68
   8) ASTM D3925-81 (1985)
   9) ASTM E300-86
   10) ASTM D1475-85
   11) ASTM D2369-87
   12) ASTM D3792-86
   13) ASTM D4017-81 (1987)
   14) ASTM D4457-85
   15) ASTM D2697-86
   16) ASTM D3980-87
   17) ASTM E180-85
   18) ASTM D2372-85
   19) ASTM D97-66

20) ASTM E-168-67 (1977)
21) ASTM E-169-87
22) ASTM E-260-91
23) ASTM D2504-83
24) ASTM D2382-83
25) ASTM D323-82 (approved 1982)
26) ASTM D2099-00

b) Standard Industrial Classification Manual, published by Executive Office of the President, Office of Management and Budget, Washington, D.C., 1987.

c) American Petroleum Institute Bulletin 2517, "Evaporation Loss From Floating Roof Tanks", Second ed., February 1980.

d) CFR Part 60 (July 1, 1991) and 40 CFR 60, Appendix A, Method 24 (57 FR 30654, July 10, 1992).

e) CFR Part 61 (July 1, 1991).

f) CFR Part 50 (July 1, 1991).

g) CFR Part 51 (July 1, 1991).

h) CFR Part 52 (July 1, 1991).

i) CFR Part 80 (July 1, 1991) and 40 CFR Part 80 Appendixes D, E, and F (July 1, 1993).

j) "A Guide for Surface Coating Calculation", United States Environmental Protection Agency, Washington, D.C., EPA-340/1-86-016.

k) "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink and Other Coating", (revised June 1986), United States Environmental Protection Agency, Washington D.C., EPA-450/3-84-019.

l) "A Guide for Graphic Arts Calculations", August 1988, United States Environmental Protection Agency, Washington D.C., EPA-340/1-88-003.

m) "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", December 1988, United States Environmental Protection Agency, Washington D.C., EPA-450/3-88-018.

n) "Control of Volatile Organic Emissions from Manufacturing of Synthesized Pharmaceutical Products", United States Environmental Protection Agency, Washington, D.C., EPA-450/2-78-029.

o) "Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", Appendix B, United States Environmental Protection Agency, Washington, D.C., EPA-450/-78-051.

p) "Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners", United States Environmental Protection Agency, Washington, D.C., EPA-450/3-82-009.

q) "APTI Course SI417 Controlling Volatile Organic Compound Emissions from Leaking Process Equipment", United States Environmental Protection Agency, Washington, D.C., EPA-450/2-82-015.

r) "Portable Instrument User's Manual for Monitoring VOC Sources", United States Environmental Protection Agency, Washington, D.C., EPA-340/1-86-015.

s) "Protocols for Generating Unit-Specific Emission Estimates for Equipment Leaks of VOC and VHAP", Unites States Environmental Protection Agency, Washington, D.C., EPA-450/3-88-010.

t) "Petroleum Refinery Enforcement Manual", United States Environmental Protection Agency, Washington, D.C., EPA-340/1-80-008.

u) "Inspection Manual for Control of Volatile Organic Emissions from Gasoline Marketing Operations: Appendix D", United States Environmental Protection Agency, Washington, D.C., EPA-340/1-80-012.

v) "Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals: Appendix A", United States Environmental Protection Agency, Washington, D.C., EPA-450/2-77-026.

w) "Technical Guidance-Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities", United States Environmental Protection Agency, Washington, D.C., EPA-450/3-91-022b.

x) California Air Resources Board, Compliance Division. Compliance Assistance Program: Gasoline Marketing and Distribution: Gasoline Facilities Phase I & II (October 1988, rev. November 1993) (CARB Manual).

y) South Coast Air Quality Management District (SCAQMD), Applied Science & Technology Division, Laboratory Services Branch, SCAQMD Method 309-91, Determination of Static Volatile Emissions.

z) South Coast Air Quality Management District (SCAQMD), Applied Science & Technology Division, Laboratory Services Branch, SCAQMD Method 312-91, Determination of Percent Monomer in Polyester Resins.

(Source: Amended at _____, effective_____)

Section 218.929 Cementable and Dress or Performance Shoe Leathers

a) The rule requirements of this Section apply to a leather manufacturing facility located at 2015 North Elston Avenue, Chicago, Illinois. The VOM emission limits set forth in this Section shall only apply to the following types of select grade of chrome tanned, bark/polymer retanned specialty leathers:

1) Cementable Shoe Leather is leather which is:

A) Hot stuffed without the presence of water, fat liquored or wet stuffed by direct contact with wax, grease, polymers and oils in liquefied form at elevated temperatures. The content of wax, grease, polymers and oils embedded into the leather shall be over 12 percent but less than 25 percent by weight, measured on a dry weight basis. Applicable leathers shall be determined using the equation below:

$12\% < P < 25\%$

Where:

$P = W\backslash L \times 100$

P = percent content of wax, grease, polymer, and oils
W = weight of wax, grease, polymers and oils in pounds added to the leather

L = dry weight of the leather in pounds before addition of wax, greases, polymers and oils.

B) Finished with coating materials which adhere to the leather surface that feels oily; and

C) Used primarily for manufacture of shoes and cannot meet the definition for specialty leather pursuant to 35 Ill. Adm. Code Section 211.6170.

2) Dress or Performance Shoe Leather is leather which is:

A) Finished with coating materials containing water emulsified materials using water miscible solvent materials to protect the leather and pigmented coating; and

B) Used primarily for manufacture of sewn shoes where the leather must be capable of soaking with a fine, dressy finish that cannot meet the lbs. per gallon VOM limitations set forth in Section 218.926 of this Subpart and cannot meet the definition for specialty leather pursuant to 35 Ill. Adm. Code Section 211.6170.

3) The requirements of this Section do not apply to the production of those specialty leathers that meet the definition of specialty leathers pursuant to 35 Ill. Adm. Code 211.6170 or to the production of leathers that can meet the control requirements of Section 218.926 of this Subpart.

4) The 10-ton exemption for stain pursuant to Section 218.926(b)(2)(i) of this Subpart does not apply to leathers produced pursuant to the requirements of this Section.

b) The production of specialty leather as defined in subsection (a) of this Section is subject to the following limitations:

1) For both water resistant and non-water resistant leathers, the leather will be designated as water resistant or non-water resistant in the shipping room by using ASTM D 2099-00, as incorporated by reference in Section 218.112 of this Part.

2) For non-water resistant leathers, the total VOM emissions shall not exceed 14.0 lbs VOM/1,000 square feet of leather produced on a 12-month rolling average basis.

3) For water resistant leathers, the total VOM emissions shall not exceed 24.0 lbs VOM/1,000 square feet of leather produced on a 12-month rolling average basis.

4) The total emissions of VOM from leathers produced pursuant to the emission limits in this Section shall not exceed 20 tons per year.

c) The owner or operator shall comply with their approved standard operating and maintenance procedures (SOMP). The SOMP will contain the following elements:

1) A procedure to minimize the volatilization of solvents during the measuring of coating proportions and/or mixing of coatings.

2) A procedure to minimize VOM fugitive losses from the coating and solvent storage rooms. Procedures should include methods of securely sealing containers and methods to clean up accidental spills.

3) A procedure to minimize solvent usage or VOM losses during equipment cleanup and during transport (including the transferring of coatings from the mixing areas to the coating lines).

d) Owner or operator shall perform the reporting and record keeping consistent with the requirements of Section 218.929 of this Subpart and Section 39.5 of the Act (415 ILCS 5/39.5), and shall include at a minimum the following:

1) The VOM content and gallons of each coating and the total pounds of VOM of all coatings applied to each category of leather, e.g., cementable non-water resistant, dress water resistant, by batch during each month; and

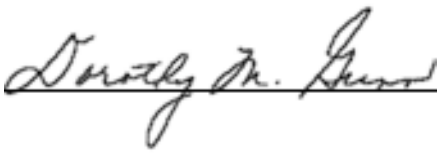
2) The total area of each category of leather produced during the month based on the number of items produced and the area of such items, measured or established in accordance with procedures set forth in a federally enforceable permit.

3) Notwithstanding the requirements of subsections (d)(1) and (d)(2) of this Section, the owner or operator may comply with an equivalent alternative plan for reporting and record keeping that has been approved by the Agency and the USEPA in a federally enforceable permit or as a SIP revision.

(Source: Amended at_____, effective_____)

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above opinion and order on February 20, 2003, by a vote of 7-0.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board