



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Tasman Leather Group, LLC
Somerset County
Hartland, Maine
A-252-70-C-R/M**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Renewal & Amendment**

FINDINGS OF FACT

After review of the Part 70 License renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Tasman Leather Group, LLC
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	316110
NATURE OF BUSINESS	Leather Tanning and Finishing
FACILITY LOCATION	Main Street, Hartland

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Boilers

<u>Equipment</u>	<u>Max. Input</u> (MMBtu/hr)	<u>Max. Firing Rate</u> (gal/hr)	<u>Fuel Type, % sulfur</u>	<u>Manu- facture Date</u>	<u>Instal- lation Date</u>	<u>Stack #</u>
Boiler #1	33.5	223.3 gal/hr 32,500 scfh	#4 oil, 2.0% S 6 oil, 2.0% S biofuel, 0.5% S nat. gas, neg. S	1977	Early 1980's	1
Boiler #2	20.3	135.5	#4 oil, 2.0% S #6 oil, 2.0% S biofuel, 0.5% S	1953	1960's	1
Boiler #3	22.2	148	#4 oil, 2.0% S #6 oil, 2.0% S biofuel, 0.5% S	1955		1
Boiler #1H	3.3	23.6	#2 oil, .5% S biofuel, 0.5% S	1968		1H

Process Equipment

<u>Equipment</u>		<u># of Units</u>	<u>Pollution Control Equipment</u>
Wet End Process	Wheels	36	None
	Dryers	14	None
	Set out machines	4	None
Finishing Process	Spray Booths	6	Dry Filters
	Roll Coater	6	None
	Steam & Propane Dryers	11	None
	Dry Mills	8	Bag house
	Polish Machine	1	Bag house
	Buffing Machines	5	Dust Removal Machines/Bag house
	Box Brush	1	Bag house

Tasman Leather Group, LLC (Tasman) has additional insignificant activities which are not listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

Tasman has the potential to emit more than 100 tons per year (TPY) of sulfur dioxide (SO₂), and 50 TPY of volatile organic compounds (VOC); therefore, the source is a major source for criteria pollutants.

C. Application Classification

The application for renewal of Tasman's air emission license includes the licensing of a new natural gas fired, direct contact water heater, and the licensing of two additional fuels (#4 fuel oil and natural gas) for Boiler #1, therefore the license is considered to be a Part 70 License renewal and amendment, issued under *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

D. Units of Measurement

The following units of measurement are used in this license:

ft ²	square feet
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
lb/ton	pounds per ton
MMBtu/hr	million British Thermal Units per hour
ppm	parts per million
scfh	standard cubic feet per hour
SF	square foot
tons/day	tons per day
tpy	tons per year

II. FACILITY AND EMISSION UNIT DESCRIPTION

A. Process Description

Tasman receives chrome-tanned hides ("blue stock") which are processed, by wet and mechanical techniques, into finished leather to be used for numerous products. The plant is currently capable of processing approximately 12,000,000 square feet of finished leather per year.

Tasman performs the following operations on the blue stock, each of which are summarized below:

1. Splitting and shaving
2. Retanning
3. Coloring
4. Fatliquoring
5. Wet End Drying
6. Buffing
7. Finishing

1. Splitting and shaving

Due to the variability in the thickness of the hides, each is first split to achieve the required thickness. The hides are fed through splitting machines, with the grain side up, yielding grain portions of uniform thickness. The underneath, or flesh layers, that are removed are called splits. The splits are not processed on site and are sold to companies that produce sueded leathers.

The grain portion of the leather is then shaven by machines utilizing helical shaped cutting blades, similar to the fleshing machines used in the tanning process. The shaving machines level the overall thickness to exact specifications and open the fiber structure to better receive subsequent chemical processing.

The hides are then placed in large rotary drums which perform three “wet end” operations: retanning, coloring, and fatliquoring. They are listed as three separate operations, however they follow one another without interruption, perform vastly different purposes and require a total time of four to twenty hours.

2. Retanning

The retanning operation provides the opportunity to combine the desirable properties of more than one tanning agent in the leather. Common additives utilized for this purpose are vegetable extracts derived from trees and shrubs, syntans, and mineral retanning agents in aqueous solutions. The hides are retanned in large cylindrical rotary drums oriented on a horizontal axis. The hides are first washed and neutralized within the drums with mild alkaline or acid chemicals to adjust both the temperature and the pH. Liquid chemicals are then input through the horizontal shaft and the drums are rotated continuously for one to two hours. Dry chemicals are added manually.

3. Coloring

The hides are colored using aniline type dyes, derived primarily from petroleum, which are dissolved in hot water and then added to the rotary drums through the hollow horizontal axle. The dyes combine with the hide fibers forming an insoluble compound which becomes part of the hide itself. The hides are then washed to eliminate excess dye and acids, et cetera, and to adjust the temperature required for the fatliquoring process.

4. Fatliquoring

Fatliquoring occurs within the drums and lubricates the fibers for flexibility and softness, increasing the pliability and tensile strength of the leather. The basic ingredients in fatliquors are oils and related fatty substances from animal, vegetable and mineral sources. The fatliquors themselves are not soluble in water, however, they are made to react with certain chemicals that impart solubility to them.

5. Drying

The hides are dried to smooth the grain and remove excess moisture. The hides may first be treated by “setting out”, a multi-purpose operation to smooth and stretch the hide while compressing and squeezing out excess moisture. The hides are hung by various methods and are transported through large “drying oven processes” by means of conveying systems. The drying oven processes include Pasting, Vacuum Drying, Hanging and Toggle Drying which remove all but an equilibrium level of moisture.

6. Buffing

To smooth the grain surface of the leather and remove any signs of natural, healed scratches or parasitic damage, the hides are buffed by machine using a sanding cylinder covered with an abrasive coating material that simultaneously collects and removes the dust created by this operation. A baghouse controls emissions.

7. Finishing

During finishing, film-forming materials are applied to the grain to provide abrasion- and stain-resistance and to enhance color. The finish provides the final surface coloration, appearance and texture as well as imparting water repellence. The coatings are prepared on-site. The following describes typical finishing operations:

An emulsion of water-borne, acrylic resins (thermoplastic polymers or copolymers) is applied. The emulsion occasionally contains butyl cellosolve (ethylene glycol monobutylether) used to assist penetration of the grain of the leather. The coating is applied using a rotating spray gun or roll coating, and the hide is then dried in an oven.

This operation may be followed by various mechanical operations and then by application of two coats of pigmented water-phase acrylic. In general, the base coats are water-borne, and water-based top coats applied.

The finishing coats are applied by rotary-gun sprayers or roll coaters. Eight or sixteen guns may be mounted on each rotary sprayer; eight guns are typically used. The leather side is transported on a wire support structure, over electronic sensors below each spray gun. The sensors signal the spray equipment to operate only when leather is below, thereby controlling overspray. Booth air is drawn horizontally through the booth; sufficient volume is maintained to prevent the exhaust VOC concentration from exceeding the Lower Explosion Limit (LEL), and to capture particulate overspray. Each rotary spray booth is followed by either a propane-heated dryer oven or a steam heated dryer oven.

VOC BACT Analysis for the Finishing Operation:

A BACT analysis performed for license A-252-70-A-I indicated product substitution is BACT for reducing overall emissions from finishing operations. Two approaches were evaluated: the use of oxidizing equipment and product substitution.

It is concluded that, by continuing product substitution, the overall tons per year of VOC emissions from finishing operations are reduced, in addition to the reduction in the calendar month pounds of VOC per thousand square feet processed.

VOC Limits from Finishing Operations

	Title V Limits (BACT)
Calendar Month - #/1000 SF	20
Annual Total - #/1000 SF	10
12-month Rolling Total - TPY	260

Periodic Monitoring:

For VOC BACT/RACT:

Length of each period of downtime for the electronic eyes on the spray lines: Downtime is defined as the period the electronic eyes are not operated in accordance with the manufacturer's specifications and the duration of the overspray event lasts more than one minute.

For HAP MACT:

Additional periodic monitoring effective February 28, 2005 is required by 40 CFR Part 63, Subpart TTTT

B. Boilers:

Boiler #1 was manufactured by Cleaver Brooks in 1977, has a maximum design heat input capacity of 33.5 MMBtu/hr, fires #4 and #6 fuel oil, with a maximum sulfur content of 2.0% by weight, and biofuel, with a maximum sulfur content of 0.5% by weight, with a maximum firing rate of 223 gallons per hour. Boiler #1 is also licensed to fire compressed natural gas, with a maximum firing rate of 32,500 standard cubic feet per hour. Boiler #1 is not subject to NSPS 40 CFR 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Industrial Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. Emissions from Boiler #1 exhaust through common Stack #1.

Boiler #2 was manufactured by the Ames Boiler Company in 1953, has a maximum design heat input capacity of 20.3 MMBtu/hr, fires #4 or #6 fuel oil, with a maximum sulfur content of 2.0% by weight, and biofuel, with a maximum sulfur content of 0.5% by weight, and has a maximum firing rate of 135 gallons per hour. Boiler #2 is not subject to NSPS 40 CFR 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Industrial Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. Emissions from Boiler #2 exhaust through common Stack #1.

Boiler #3 was manufactured by the Ames Boiler Company in 1955, has a maximum design heat input capacity of 22.2 MMBtu/hr, fires #4 or #6 fuel oil, with a maximum sulfur content of 2.0% by weight, and biofuel, with a maximum sulfur content of 0.5% by weight, and has a maximum firing rate of 148 gallons per hour. Boiler #3 is not subject to NSPS 40 CFR 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Industrial Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. Emissions from Boiler #3 exhaust through common Stack #1.

Boiler #1H was manufactured by the Cleaver Brooks in 1968, has a maximum design heat input capacity of 3.3 MMBtu/hr, fires #2 fuel oil and biofuel, both with a maximum sulfur content of 0.5% by weight, and has a maximum firing rate of 22 gallons per hour. Boiler #1H is not subject to NSPS 40 CFR 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Industrial Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. Emissions from Boiler #1H exhaust through Stack #1H.

National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources, 40 CFR Part 63, Subpart JJJJJ

Boilers #1, #2, and #3

Boilers #1, #2, and #3 are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The units are considered existing oil boiler rated greater than 5 MMBtu/hr.

A summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however Tasman is still subject to the requirements. Notification forms and additional rule information can be found on the following website:

<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

- a. Compliance Dates, Notifications, and Work Practice Requirements
 - i. Initial Notification of Compliance

An Initial Notification submittal to EPA is due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

- (a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1)]
- (b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
 2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
• <i>New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below</i>	Every 2 years
• <i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR Part 63.11223(b)(6)]

The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

iii. Energy Assessment:

Boilers #1, #2, and #3 are subject to the energy assessment requirement as follows:

- (a) A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (b) The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
[40 CFR Part 63, Table 2(4)]
- (c) A Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

Note: EPA will require submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. However, the system will not be in place until October 2013, so sources may submit the written NOCS to the EPA Administrator. [63.1125(a)(4)(vi)]

Boiler #1H

Boiler #1H is subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The unit is considered an existing oil boiler, rated less than 5 MMBtu/hr.

A summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however Tasman is still subject to the requirements. Notification forms and additional rule information can be found on the following website:

<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA is due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

- (a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1).
- (b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
 2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
• <i>New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below</i>	Every 2 years
• <i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR Part 63.11223(b)(6)]

The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

Note: EPA will require submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. However, the system will not be in place until October 2013, so sources may submit the written NOCS to the EPA Administrator. [63.1125(a)(4)(vi)]

Streamlining for Boilers #1, # 2, #3 and #1H

1. *Low Sulfur Fuel*, 06-096 CMR 106 (as amended) regulates fuel sulfur content, however in this case a previous BACT analysis determined a more stringent limit of 0.5% for Boiler #1H, which shall be used. A more stringent limit of 0.5% for biofuel is appropriate and shall be used.
2. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (as amended) regulates PM emission limits. The PM₁₀ limits are derived from the PM limits.
3. *Visible Emissions Regulation*, 06-096 CMR 101 (as amended), Section 2(D), is applicable for visible emissions.
4. *Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides*, 06-096 CMR 138, Section 3(L) is applicable to Boilers #1, #2, and #3.

Periodic Monitoring

Boilers #1, #2, #3 and #1H

Fuel oil recordkeeping which includes records indicating the quantity of fuel delivered as well as the percent sulfur by weight.

Based on the boilers being operated in a manner consistent with good air pollution control practices, it is unlikely the boilers will exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required, however neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

Boiler #1H

Tasman shall clean the oil guns once per year and keep a maintenance log for each boiler. The log shall include any work performed on the boilers as well as oil gun cleaning frequencies.

Boilers #1, #2, and #3

Annual tune-up and subject to the following NOx RACT tune-up record keeping requirements:

- a. A tune-up record file must be kept on-site and made available to the Department upon request,
- b. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file,
- c. Once the optimum excess oxygen setting has been determined, the owner or operator of a source must verify the setting remains at that value by December 31 of each year,
- d. If the minimum oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, the owner or operator must improve the fuel and air mixing, thereby allowing operation with less air.

C. Facility Emissions

1. Total Annual emissions are based on the following limits:

- 1,200,000 gallons of #4 or #6 fuel oil or biofuel per year, based on a 12-month rolling total, fired in Boilers #1, #2, and #3
- 165.1 million standard cubic feet of natural gas fired in Boiler #1
- 25,000 gallons of ASTM D396 compliant #2 fuel oil per year, or biofuel, based on a 12-month rolling total, fired in Boiler #1H
- 260.0 tons of VOC from the tanning processes, based on a 12-month rolling total.

Total Licensed Annual Emission for the Facility
Tons per year
(Used to calculate the annual license fee)

	<u>PM</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>VOC</u>
#4, #5 & #6 Fuel Oil	18.0	18.0	189.1	45.0	3.0	0.8
Natural gas	0.10	0.10	0.10	8.3	6.9	0.5
#2 Fuel Oil	0.20	0.20	0.90	0.90	0.10	0.10
Process Emissions	-	-	-	-	-	260.0
Total TPY	18.3	18.3	190.9	54.2	10.	261.4

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's fuel use limits, the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, Tasman is below the major source threshold of 100,000 tons of CO₂e per year.

III. AIR QUALITY ANALYSIS

Tasman previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-252-70-C-R pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Tasman Leather pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [06-096 CMR 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [06-096 CMR 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated September 10, 2008.

Source	Citation	Description	Basis For Determination
Boilers #1, #2, #3, and #1H	40 CFR Part 60, Subpart Db	Standards of Performance for Steam Generating Units with maximum heat input rate greater than 100 MMBtu/hr.	All units have heat input less than 100 MMBtu/hr.
Facility	40 CFR Part 61, Subpart V	Subpart is applicable to pumps, compressors, pressure relief devices, valves, flanges and control devices that operate in volatile hazardous air pollutant (VHAP) service. VHAP includes only Benzene and Vinyl Chloride	No equipment in benzene or vinyl chloride service at the facility.
Facility	40 CFR Part 63, Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	Affects styrene/butadiene rubber production, poly-butadiene rubber production and processes producing certain agricultural chemicals. No affected units at the facility.

Facility	40 CFR Part 63, Subpart T	Standards of Performance for Halogenated Solvent Cleaners	For solvent cleaners containing methylene chloride, perchloroethylene 1,1,1, trichloroethane, carbon tetrachloride or chloroform. Not solvent cleaners operated at the facility.
Facility	06-096 CMR 129	Surface Coating Facilities	No equipment subject to this regulation is operated at the facility.
Facility	06-096 CMR 135	Hexavalent Chromium Particulate Emission Standard	No equipment subject to this regulation is operated at the facility.

[06-096 CMR 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 CMR 140;
 - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
 - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 CMR 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 CMR 140]

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S.A. §347-C);
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140; [06-096 CMR 140]
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; [06-096 CMR 140] **Enforceable by State-only**
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S.A. §353.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [06-096 CMR 140] **Enforceable by State-only**
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [06-096 CMR 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 CMR 140]

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

- A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - 2. to demonstrate compliance with the applicable emission standards; or
 - 3. pursuant to any other requirement of this license to perform stack testing.
- B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
- C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 140]

Enforceable by State-only

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
- B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
[06-096 CMR 140]
Enforceable by State-only
- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.
- Pursuant to 38 M.R.S.A. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.
- C. All other deviations shall be reported to the Department in the facility's semiannual report.
[06-096 CMR 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 CMR 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;
- [06-096 CMR 140]

SPECIAL CONDITIONS

- (14) **Boiler #1**
- A. The sulfur content of the fuel oil fired shall not exceed 2.0% for #4 and #6, and 0.5% for biofuel, both by weight, demonstrated by purchase records from the supplier. [06-096 CMR 106]
 - B. Boiler #1 is also licensed to fire natural gas.
 - C. Emissions from the boiler shall not exceed the following limits:

Firing #4 or #6 fuel oil:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 CMR 103(2)(B)(1)(a)	-
NO _x	0.50	06-096 CMR 140, BACT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	6.70	06-096 CMR 140, BACT	Enforceable by State-only
PM ₁₀	6.70	06-096 CMR 140, BACT	Enforceable by State-only
SO ₂	70.39	06-096 CMR 140, BACT	Enforceable by State-only
NO _x	16.75	06-096 CMR 140, BACT	Enforceable by State-only
CO	1.12	06-096 CMR 140, BACT	Enforceable by State-only
VOC	0.06	06-096 CMR 140, BACT	Enforceable by State-only

Firing natural gas:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.05	06-096 CMR 103(2)(B)(1)(a)	-
NO _x	0.097	06-096 CMR 140, BACT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	1.67	06-096 CMR 140, BACT	Enforceable by State-only
PM ₁₀	1.67	06-096 CMR 140, BACT	Enforceable by State-only
SO ₂	0.02	06-096 CMR 140, BACT	Enforceable by State-only
NO _x	3.25	06-096 CMR 140, BACT	Enforceable by State-only
CO	2.73	06-096 CMR 140, BACT	Enforceable by State-only
VOC	0.18	06-096 CMR 140, BACT	Enforceable by State-only

(15) **Boiler #2**

- A. The sulfur content of the fuel oil fired shall not exceed 2.0% for #6 and 0.5% for biofuel, both by weight, demonstrated by purchase records from the supplier. [06-096 CMR 106]
- B. Emissions from the boiler shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 CMR 103(2)(B)(1)(a)	-
NO _x	0.50	06-096 CMR 140, BACT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	4.06	06-096 CMR 140, BACT	Enforceable by State-only
PM ₁₀	4.06	06-096 CMR 140, BACT	Enforceable by State-only
SO ₂	42.66	06-096 CMR 140, BACT	Enforceable by State-only
NO _x	10.15	06-096 CMR 140, BACT	Enforceable by State-only
CO	0.68	06-096 CMR 140, BACT	Enforceable by State-only
VOC	0.04	06-096 CMR 140, BACT	Enforceable by State-only

(16) **Boiler #3**

- A. The sulfur content of the fuel oil fired shall not exceed 2.0% for #6 and 0.5% for biofuel, both by weight, demonstrated by purchase records from the supplier. [06-096 CMR 106]
- B. Emissions from the boiler shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 CMR 103(2)(B)(1)(a)	-
NO _x	0.50	06-096 CMR 140, BACT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	4.44	06-096 CMR 140, BACT	Enforceable by State-only
PM ₁₀	4.44	06-096 CMR 140, BACT	Enforceable by State-only
SO ₂	46.65	06-096 CMR 140, BACT	Enforceable by State-only
NO _x	11.10	06-096 CMR 140, BACT	Enforceable by State-only
CO	0.74	06-096 CMR 140, BACT	Enforceable by State-only
VOC	0.04	06-096 CMR 140, BACT	Enforceable by State-only

(17) **Boiler #1H**

- A. Boiler #1H shall fire only ASTM D 396 compliant #2 fuel oil, and biofuel with a sulfur content not to exceed 0.5%. [06-096 CMR 106]
- B. Emissions from the boiler shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 CMR 103(2)(B)(1)(a)	-
NO _x	0.50	06-096 CMR 140, BACT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.33	06-096 CMR 140, BACT	Enforceable by State-only
PM ₁₀	0.33	06-096 CMR 140, BACT	Enforceable by State-only
SO ₂	1.66	06-096 CMR 140, BACT	Enforceable by State-only
NO _x	1.65	06-096 CMR 140, BACT	Enforceable by State-only
CO	0.12	06-096 CMR 140, BACT	Enforceable by State-only
VOC	0.01	06-096 CMR 140, BACT	Enforceable by State-only

- (18) Combined fuel use in Boilers #1, #2, and #3 shall not exceed 1,200,000 gallons per year of #4 and #6 fuel oil, with a sulfur content not to exceed 2.0% by weight, and biofuel, with a sulfur content not to exceed 0.5% by weight, based on a 12-month rolling total. Fuel use records, showing the quantity and sulfur content, shall be maintained to demonstrate compliance. [06-096 CMR 140, BPT]
- (19) Fuel use in Boiler #1H shall not exceed 25,000 gallons per year of ASTM D396 compliant #2 fuel oil, and biofuel combined, based on a 12-month rolling total. Fuel use records, showing the quantity and sulfur content, shall be maintained to demonstrate compliance. [06-096 CMR 140, BPT]

- (20) Visible emissions from common Stack #1 serving Boilers #1, #2 and #3, shall not exceed 30 percent opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a three (3) hour period, when only one boiler is operating. [06-096 CMR 140, BPT]

Visible emissions from common Stack #1 serving Boilers #1, #2, and #3, shall not exceed 30 percent opacity on a six (6) minute block average basis, except for no more than three (3) six (6) minute block averages in a three (3) hour period, when two or more boilers are operating. [06-096 CMR 140, BPT]

- (21) Visible emissions from the stack serving Boiler #1H shall not exceed 20 percent opacity on a six (6) minute block average basis, except for one (1) six (6) minute block average in a three (3) hour period. [06-096 CMR 140, BPT]

- (22) The oil guns in Boiler #1H shall be cleaned once per year. A maintenance log shall be kept for Boiler #1H, and shall document any work performed on the boilers as well as oil gun cleaning frequencies. [06-960 CMR 140, BPT]
Enforceable by State-only.

- (23) **National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources, 40 CFR Part 63, Subpart JJJJJJ**

Tasman shall comply with the requirements of 40 CFR Pat 63, Subpart JJJJJJ, as required, including:

Boilers #1, #2, and #3

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

- (a) A boiler tune-up program was to be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1)]
- (b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
 2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status was to be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
<i>• New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below</i>	Every 2 years
<i>• New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR Part 63.11223(b)(6)]

The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

iii. Energy Assessment:

Boilers #1, #2, and #3 are subject to the energy assessment requirement as follows:

- (a) A one-time energy assessment was to be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (b) The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
[40 CFR Part 63, Table 2(4)]
- (c) A Notification of Compliance Status was to be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

Boiler #1H

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(b) A boiler tune-up program was to be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1).

(b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]

2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]
- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status was to be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
• <i>New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below</i>	Every 2 years
• <i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR Part 63.11223(b)(6)]

The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

(24) **NOx RACT Requirements**

Boilers #1, #2, and #3 are each required to have an annual tune-up if the boiler is operated more than 168 hours in any quarter. If the tune-up is to occur in the fourth quarter, the tune-up may be postponed (deferred) for 30 days from the end of the quarter. If the postponement carries the tune-up into the next calendar year, the obligation for an annual tune-up for that calendar year will also have been met. These boilers are subject to the following NOx RACT tune-up record keeping requirements:

- A. A tune-up procedure file must be kept on-site and made available to the Department upon request,
- B. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file,
- C. Once the optimum excess oxygen setting has been determined, the owner or operator of a source must verify the setting remains at that value by December 31 of each year, and
- D. If the minimum oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, the owner or operator must improve the fuel and air mixing, thereby allowing operation with less air. [06-096 CMR 138]

(25) **Buffing Operation**

- A. Visible emission from the Buffing Operation Main Building Stacks #2 and #3 shall not exceed ten (10) percent opacity on a six (6)-minute block average basis, except for no more than one (1), six (6)-minute block average in a one (1)-hour period.
- B. No more than 12 buffing units may be in operation at the Main Building. Tasman may request a revision of this license to allow more units to be in operation. Such a request may require Tasman to perform additional testing to demonstrate the dust removal systems can maintain the 90 percent particulate removal efficiency.

[06-096 CMR 140, BPT]

(26) **Finishing Operations**

Visible emissions from the Finishing Operations spray booth stacks shall not exceed ten (10) percent opacity on a six (6)-minute block average basis, except for no more than one (1), six (6)-minute block average in a one (1)-hour period.
[06-096 CMR 140, BPT]

(27) **VOC BACT/RACT Limits and Requirements** [06-096 CMR 134, BPT]

The total VOC emission from the facility shall not exceed:

- A. Calendar month 20.0 pounds/1000 square feet processed
- Year total 10.0 pounds/1000 square feet processed

$$Actual \frac{\#VOC}{1000 \text{ ft}^2} = \frac{Total \#VOC}{Total \text{ ft}^2 \text{ leather processed}} \times (1000)$$

Where:

$$Pounds \text{ of finish used} = (Beginning \text{ weight of finish used}) - (End \text{ weight of finish used})$$

$$Total \text{ Pounds of VOC} = (Percent \text{ VOCs in finish}) \times (Pounds \text{ of finish used})$$

$$Total \text{ square feet of leather processed} = (number \text{ of sides processed}) \times (22.5 \text{ square feet per side})$$

Note: On average, there are 22.5 square feet of surface area per trimmed side of leather. Finish operations process untrimmed leather, thus increasing the conservative nature of these calculations.

- B. 260.0 tons of VOC per year on a 12-month rolling total basis, where:
 - a. The 12 months shall be June 1 to May 31
 - b. The tons of VOC emissions are documented by the finish formula used (from MSDS or manufacturer information), the beginning amount of finish material used, and the end amount of finish material used.
 - C. Tasman shall submit the above monthly limit demonstrations as part of the semi-annual reports due January 31 and July 31 of each year. Compliance with the year total limit will be demonstrated at the end of the 12-month rolling average period, as part of the annual compliance certification report due January 31 of each year.
- (28) Total VOC emissions from Lines #10 and #11 shall not exceed 39.9 tons per year on a 12-month rolling total basis. VOC emissions shall be calculated from the VOC content of all material that is used on Line #10 and #11. [06-096 CMR 140, BPT]
- (29) HAP emissions from Tasman shall not exceed:
- A. A facility wide limit of 45.0 tons per year of any one single HAP based on a 12-month rolling total.
 - B. A facility wide limit of 55.0 tons per year of total HAPs based on a 12-month rolling total.
 - C. The records documenting the above limits for HAPs shall be based on: the finish formula used (from MSDS or manufacturer information), the beginning amount of finish material used, the end amount of finish material used.
[06-096 CMR 134BPT]
- (30) Tasman shall meet the requirements of 40 CFR Part 63, Subpart TTTT.
- (31) Tasman shall utilize electronic eyes on all automatic spray lines at all times that the lines are operating. The electronic eyes shall be maintained and operated according to the manufacturer's specifications and operating procedures, with the length of each downtime recorded in the semi-annual report. Downtime is defined as when the electronic eyes are not operated in accordance with the manufacturer's specifications and the duration of the overspray event last more than one minute. [06-096 CMR 140, BPT] **Enforceable by State-only.**

- (32) Tasman shall utilize high volume low pressure (HVLP) spray guns for all manual spraying and on all automatic spray lines at all times the lines are operating. The HVLP guns shall be maintained and operated according to the manufacturer's specifications and operating procedures. [06-096 CMR 140, BPT] **Enforceable by State-only.**
- (33) Tasman shall develop Standard Operating and Maintenance Procedures (SOMP) to minimize VOC losses, and post these procedures at the appropriate locations within the facility. The procedures shall contain, at a minimum:
- A. A procedure to minimize the volatilization of solvents during the measuring of coating proportions and/or mixing of coatings;
 - B. A procedure to minimize VOC fugitive losses from the coating and solvent storage rooms. Procedures should include methods of securely sealing containers and methods to clean up accidental spills.
 - C. A procedure to minimize solvent usage or VOC losses during equipment cleanup, and during transport (including the transferring of coatings from the mixing areas to the coating lines).
- [06-096 CMR 140, BPT] **Enforceable by State-only.**

(34) **Recordkeeping Requirements**

The following are identified as Periodic Monitors [06-096 CMR 140]:

1. #4, #5 and #6 fuel oil sulfur content.
2. 12-month rolling total of #5 and #6 fuel oil purchased for use in Boilers #1, #2, and #3 (combined).
3. 12-month rolling total of biofuel purchased for use in Boilers #1, #2, and #3 (combined).
4. 12-month rolling total of compressed natural gas purchased for use in Boiler #1.
5. 12-month rolling total of #2 fuel oil purchased for use in Boiler #1H.
6. Boiler #1H annual oil gun cleaning documentation, as well as a log boiler work performed.
7. Boiler #1 annual tune-up documentation.
8. Boiler #2 annual tune-up documentation.
9. Boiler #3 annual tune-up documentation.

10. Pounds of VOC per 1000 square feet of leather processed on a calendar month basis.
 11. Tons of VOC emissions per calendar month.
 12. Tons of VOC emissions from June 1 to May 31.
 13. Automatic spray line electronic eye down time log.
 14. 12-month rolling total of VOC emissions from roll coater Line #10.
 15. 12-month rolling total of VOC emissions from roll coater Line #11.
 16. 12-month rolling total of tons of individual HAP emissions.
 17. 12-month rolling total of tons of total HAP emissions.
- [06-096 CMR 140, 117, and 122]

(35) Semiannual Reporting

- A. The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.
- B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.
- C. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[06-096 CMR 140]

(36) Annual Compliance Certification

Tasman shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31 of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors.

[06-096 CMR 140]

(37) **A. Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1. A computer program and accompanying instructions supplied by the Department; or
2. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted by the date as specified in 06-096 CMR 137.

B. Hazardous Air Pollutant Emission Statement

In accordance with 06-096 CMR 137, the licensee shall report every three years (2014, 2017, et cetera) to the Department information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted by the date as specified in 06-096 CMR 137.

[06-096 CMR 137]

(38) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
06-096 CMR 102	Open Burning	-
06-096 CMR 109	Emergency Episode Regulation	-
06-096 CMR 110	Ambient Air Quality Standard	-
06-096 CMR 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(39) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units includes refrigerators and any size air conditioner that contain CFCs. [40 CFR, Part 82, Subpart F]

(40) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Tasman shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(41) **Expiration of a Part 70 license**

- A. Tasman shall submit a complete Part 70 renewal application at least 6 months, but no more than 18 months, prior to the expiration of this air license.
- B. Pursuant to Title 5 MRSA §10002, and 06-096 CMR 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under Chapter 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

DONE AND DATED IN AUGUSTA, MAINE THIS 5 DAY OF March, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Patricia W. Aho*
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/28/2008

Date of application acceptance: 1/20/2009

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, PE, Bureau of Air Quality.

