OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

03/17/98

CERTIFIED MAIL

15-76-05-1299

RE: Final Chapter 3745-35 Permit To Operate

Rice Cleaners
Mr. Andrew Kismann
3112 Market Ave. N.
Canton, OH 44714

0 1998

Dear Andrew Kismann:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Canton Division of Air Pollution Control at (216) 489-3385.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Canton Division of Air Pollution Control

OhioEPA

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 03/17/98

Facility ID: 15-76-05-1299

Expiration Date: 03/17/03

FINAL ISSUE

This document constitutes issuance for:

Rice Cleaners
3112 Market Ave. N.
Canton, OH 44714

of a permit to operate for:

D001 (Perc & Petro Solvent Dry Cleaner)
Perchloroethylene dry cleaner w/ dry to dry machine used on occasion; Petroleum Solvent dry cleaner w/ one washer and two dryers used most of the time.

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quar terly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. **Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. **Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. **Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. **Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. **Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. **Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(216) 489-3385

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director Donald R Schregardus

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Perchloroethylene Dry Cleaning: Permac Bowe P308 -- Existing dry-to-dry perchloroethylene (perc) dry cleaning machine installed in 1980, 15 lb. cap. w/ cooling water condenser and disposable cartridge filter.	40 CFR Part 63, Subparts A, M (NESHAP: General Provisions & MACT Standard). OAC 3745-21-09 (AA) - except OAC 3745-21-09 (AA)(1)(a).	139 gallons per rolling 12-month period consumption limit of perchloroethylene. Maximum of 60,000 pounds of fabric cleaned annually.
Petroleum Solvent (140-F) Dry Cleaning: Solvic 23A -- Existing Petroleum Solvent washer, 40 lb. cap. w/o controls. Huebsch 37AC -- Existing dryer #1, 50 lb. cap. w/o controls. Huebsch 37AC -- Existing dryer #2, 50 lb. cap. w/o controls.	OAC 3745-21-09 (BB) - except OAC 3745-21-09 (BB)(1)(a & b) & (2).	Total annual consumption limit shall be 4,700 gallons/year of petroleum solvent.

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. OAC rule 3745-21-09 (AA) operational restrictions

1.a The waste from any diatomaceous earth filter which has been used to filter perchloroethylene shall contain no more than 25 percent by weight VOC, as determined under paragraph (J) of OAC rule 3745-21-10.

1.b The waste from any distillation operation (solvent still) which has been used to distill perchloroethylene shall contain no more than 60 percent by weight VOC, as determined under paragraph (J) of OAC rule 3745-21-10.

1.c Any disposable filter cartridge which has been used to filter perchloroethylene shall be drained in the filter housing for at least 24 hours before being discarded.

1.d All equipment must be maintained so as to prevent the leaking of perchloroethylene liquid and prevent perceptible vapor leaks from gaskets, seals, ducts, and related equipment. Any equipment which is leaking perchloroethylene liquid or has a perceptible vapor leak shall not be operated until the leak is repaired.

2. NESHAP operational restrictions

2.a The permittee shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks.

B. Operational Restrictions (continued)

2.b The door of each perc dry cleaning machine shall be closed at all times except to transfer articles to and from the machine.

2.c The perc dry cleaning machine shall be operated and maintained according to manufacturer's specifications and recommendations.

3. OAC 3745-21-09 (BB) operational restrictions

3.a Any bucket or barrel which contains petroleum solvent or petroleum solvent-laden waste shall be covered to minimize solvent evaporation.

3.b Any equipment associated with the use of petroleum solvent shall be visually inspected weekly to identify any liquid leaks of petroleum solvent.

3.c Any liquid or vapor leak of petroleum solvent shall be repaired within fifteen days after identifying the source of the leak, unless a necessary repair part is not on hand. If a repair part is not on hand, it shall be ordered within three working days after identifying the source of the leak. The leak shall be repaired within fifteen days following the delivery of the necessary repair part.

C. Monitoring and/or Record Keeping Requirements

1. NESHAP visual leak monitoring requirements

A leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious from sight, smell, or touch shall be conducted. Pursuant to OAC rule 3745-21-09(AA)(1)(e), any equipment found to be leaking perchloroethylene liquid or vapor is not to be operated until the leak is repaired. Leaks are to be repaired within 24 hours after being found, or repair parts ordered within 2 working days after detecting a leak that needs repair parts. Repair parts shall be installed within 5 working days after they are received. In accordance with 40 CFR Part 63 Subpart M, compliance with this requirement shall be determined through biweekly visual inspection of the following components while the perc dry cleaning system is operating:

a. hose and pipe connections, fittings, coupling and valves;
b. machine door gaskets and seatings:
c. filter gaskets and seatings;
d. pumps;
e. solvent tanks and containers;
f. water separators;
g. filter sludge recovery;
h. distillation valves
i. diverter valves;
j. saturated lint from the lint basket;
k. cartridge filters and housings;
l. muck cookers;
m. stills; and
n. exhaust dampers.

2. The following records shall be kept on site in a log for a period of not less than 5 years, and shall be made available upon request:

2.a Perchloroethylene dry cleaning operation:

i. Receipts of all perchloroethylene purchases.

ii. The volume of perchloroethylene purchased each month as recorded from perchloroethylene purchases. If no perchloroethylene is purchased during a given month, then the entry into the log shall be zero gallons.

iii. The calculation and result of the yearly perchloroethylene consumption (12-month rolling summation), to be determined on the first day of each month.

iv. The results of all visual inspections, including the dates when the dry cleaning system components are inspected for leaks and the name or location of dry cleaning system components where leaks are detected.

v. The dates of repair and records of written or verbal orders for repair parts.

vi. The results and dates of all equipment monitoring required by this permit.

C. Monitoring and/or Record Keeping Requirements (continued)

2.b Petroleum Solvent dry cleaning operation:

i. The solvent consumption shall be recorded monthly.

ii. The results of any leak checks, including, at a minimum, the following information.

(a) Date of inspection.
(b) Findings (may indicate no leaks discovered or location, nature, and severity of each leak).
(c) Leak determination method.
(d) Corrective action (date each leak repaired and reasons for any repair interval in excess of fifteen calendar days).
(e) Inspector's name and signature.

3. The following records shall be kept for a period of not less than three years:

i. Perc control equipment maintenance.

ii. The amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.

4. A copy of the design specifications and the operating manuals for each perc dry-cleaning system and each emission control device located at the dry cleaning facility shall be retained onsite and be made available upon request.

D. Reporting Requirements

1. If the permit perchloroethylene solvent consumption limit of 139 gallons is exceeded by the rolling 12-month period perchloroethylene consumption calculation required by the recordkeeping requirements section of this permit, then the permittee shall submit a deviation report which identifies the exceedance of that limit. This report shall be submitted within thirty (30) days following the month during which the exceedance occurred.

2. Any petroleum solvent leaks in vapor or liquid lines that are not repaired within fifteen (15) days after identification shall be reported within thirty (30) days after the repair is completed.

3. This petroleum solvent dry cleaning facility is exempted from OAC 3745-21-09 (BB) (1) (a & b) & (2) pursuant to OAC 3745-21-09 (BB) (3) (b). If the facility should have an annual consumption of petroleum solvent greater than four thousand seven hundred (4,700) gallons, the permittee shall report such within thirty (30) days of becoming aware of the occurrence. The facility also must comply with the requirements of a non-exempt source within 180 days of the exceedance determination.

4. This perchloroethylene dry cleaning facility is exempt from OAC 3745-21-09 (AA) (1) (a) pursuant to OAC 3745-21-09 (AA) (2) (c). If the total annual amount of fabric dry cleaned with perc should exceed the sixty thousand pound limit, then the facility is no longer exempt from OAC 3745-21-09 (AA)(1)(a) and the permittee shall submit an exceedance report within thirty (30) days following the month during which the exceedance occurred. The facility also must comply with the requirements of a non-exempt source within 180 days of the exceedance determination.

5. All required reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Ave. N, Canton, Ohio 44702.

E. Testing Requirements

1. Compliance with the emission limitations in the air emission summary of this permit shall be determined in accord with the following methods:

1.a Consumption limitation - 139 gallons of Perchloroethylene per rolling 12-month period

Applicable compliance method - shall be demonstrated by perchloroethylene purchase records as a rolling 12-month summation as required in the recordkeeping section of this permit.

1.b Consumption limitation - 4700 gallons of petroleum solvent per calendar year

Applicable compliance method - utilizing the monthly solvent consumption records as required in the recordkeeping section of this permit, summate the recorded consumption gallonages for the months of January to December of the subject year.

F. Miscellaneous Requirements

1. If the rolling 12-month consumption of perchloroethylene as calculated according to 40 CFR 63.323(d) exceeds 139 gallons per year, this facility becomes a large area source and must comply with the requirements for a large source per 40 CFR 63, Subpart M, within 180 days of the exceedance determination and the permittee shall submit a signed statement as required by 40 CFR 63.324(c).