John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/11/2013

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Tara Seibert
BRENT INDUSTRIES, INC.
2922 SOUTH AVE.
Toledo, OH 43609

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011678
Permit Number: P0112145
Permit Type: Renewal
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

PUBLIC NOTICE
10/11/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

BRENT INDUSTRIES, INC.
2922 SOUTH AVE.,
Toledo, OH 43609
Lucas County
FACILITY DESC.: Industrial Launderers
PERMIT #: P0112145
PERMIT TYPE: Renewal
PERMIT DESC: FEPTIO Renewal permit for a Stoddard solvent dry cleaning facility

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Babak Firoozi, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:
   Brent Industries Inc. is located at 2922 South Ave., Toledo, OH, 43609. Brent Industries is an industrial dry cleaning facility using Stoddard petroleum solvent. The equipment consists of seven washers of different manufacturers and size. They also have thirteen dryers (130 lb dry weight steam heated dryers). This permit is for a Permit to Operate renewal for a Federally Enforceable permit.

3. Facility Emissions and Attainment Status:
   This facility will be a synthetic minor source for volatile organic compounds, a minor source for all other criteria pollutants and a minor source for HAPs.

   Lucas County is designated attainment for all criteria pollutants.

4. Applicable Rules and Regulations:
   The facility requested a synthetic minor limitation on volatile organic compounds to avoid TV applicability in the 1996 Permit to Install PTI 04-1025. State and Federal regulations apply to this facility.

OAC rule 3745-31-05(A)(3) (PTI 04-01025, issued 7/11/96)	BAT is compliance with OAC rule 3745-21-09(BB) and NSPS subpart JJJ – Standards of Performance for Petroleum Dry Cleaners.
OAC rule 3745-31-05(D)	Voluntary restriction of 90 tons per year OC to avoid Title V
OAC rule 3745-21-09(BB)	3.5 pounds of VOC per one hundred pounds dry weight of articles cleaned as determined by OAC rule 3745-21-10(L).
40 CFR 60, Subpart JJJ	This regulation applies to petroleum dry cleaning dryers, washers, filters, stills and settling tanks. The facility does not utilize filters or settling tanks.

5. Source Emissions:
   The PTI allowable emission rate of 4.5 lbs VOC/100 pounds cleaned was developed based on the 3.5 lb VOC/100 lbs dry weight of articles cleaned from OAC rule 3745-21-09(BB) and 1 lb VOC/100 lbs dry weight from AP 42, Table 4.1-1 (4/81) for miscellaneous losses from flanges, pumps, pipes, storage tanks and fixed losses from opening and closing the dryers, etc., including any ancillary losses from the products laundered.

   NOTE: AP-42 (4/81 and 1/95), Table 4.1-1 uses an emissions factor of 2 lbs/100 lbs of clothes cleaned for well-controlled systems along with a 1 lb/100 lbs for losses which equals 3 lbs/100 lbs clothes cleaned (dry weight). The AP-42 also indicated in the table footnotes that different materials in the wash

retain a different amount of solvent (i.e., cotton, 20 lbs/100 lbs; leather, 40 lbs/100 lbs), hence the higher permit allowable emission limitation established as BAT in the PTI based on the OAC 3745-21-09(BB) limit of 3.5 lbs VOC/100 lbs of articles cleaned (dry) and the 1 lb VOC/100 lbs dry weight from AP 42, Table 4.1-1 (4/81) from miscellaneous losses.

Potential to Emit (PTE):
The potential to emit for the eleven dryers based on a capacity of 130 lbs materials cleaned per hour would be:
(3.5 lbs VOC/100 lbs dry weight) * 11 dryers * 130 lbs/hr * 8760 hr/yr * (1 ton/2000 lbs) = 219 TPY VOC

Due to the high PTE, the permittee, also, requested a federally enforceable restriction on solvent emissions of 90 tons per year VOC in the PTI. This was based upon a limitation of 4,000,000 pounds of materials dry cleaned (dry weight) per rolling, 12-month period.

Federally Enforceable Restricted Allowable Limit (on a rolling, 12-month basis):
((3.5 + 1.0 lbs VOC)/100 lbs dry weight) * (4,000,000 lbs materials/year) * (1 ton/2000 lbs) = 90 tons VOC per year

Actual emissions are based on 2,300,000 lbs per year:
((3.5 + 1.0 lbs VOC)/100 lbs dry weight) * (2,300,000 lbs materials/year) * (1 ton/2000 lbs) = 51.8 tons per year VOC

6. Conclusion:
   It is recommended this permit be issued.

7. Please provide additional notes or comments as necessary:

   None

8. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	90

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
BRENT INDUSTRIES, INC.

Facility ID:	0448011678
Permit Number:	P0112145
Permit Type:	Renewal
Issued:	10/11/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
BRENT INDUSTRIES, INC.

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. D001, Industrial Stoddard Dry Cleaner 11

Authorization

Facility ID:	0448011678
Application Number(s):	A0046148
Permit Number:	P0112145
Permit Description:	FEPTIO Renewal permit for a Stoddard solvent dry cleaning facility
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/11/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

BRENT INDUSTRIES, INC.
2922 SOUTH AVE.
Toledo, OH 43609

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112145
Permit Description: FEPTIO Renewal permit for a Stoddard solvent dry cleaning facility

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**D001**
Company Equipment ID:	Industrial Stoddard Dry Cleaner
Superseded Permit Number:	P0088466
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The following emissions unit contained in this permit is subject to 40 CFR, Part 60, Subpart JJJ, Standards of Performance for Petroleum Dry Cleaners: D001. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website http://ecfr.gpoaccess.govor by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. D001, Industrial Stoddard Dry Cleaner

Operations, Property and/or Equipment Description:

D001 - Industrial Stoddard Dry Cleaner with 11 solvent dryers and 7 washers

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-1025, issued 7/11/1996)	4.5 lbs VOC/100 lbs cleaned (dry weight) See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D) (to avoid TV applicability)	90 tons per year of VOC per rolling, 12-month period. See c)(1)
c.	40 CFR Part 60, Subpart JJJ (40 CFR 60.620-60.625) [In accordance with 40 CFR 60.620(a) and (a)(2), this emissions unit is a petroleum dry cleaning plant with a total manufacturers' rated dryer capacity greater than 38 kilograms (84 pounds), installed after 12/14/1982 and subject to the	See b)(2)a. through b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	emissions limitations and/or control measures specified in this section.]	
d.	OAC rule 3745-21-09(BB)	3.5 lbs VOC/100 lbs cleaned (dry weight)

(2) Additional Terms and Conditions

a. The vacuum pump discharge shall utilize a submerged fill pipe when discharging solvent to the system feed tank. There shall be no visible emissions, as bubbles, from the vacuum pump submerged discharge.

b. The recovered solvent flow rate from the solvent-recovery dryer at the termination of the recovery cycle shall be no greater than 0.05 liters/minute.

c. Each solvent dry cleaning dryer shall be of a solvent-recovery design.

d. Each dry cleaning solvent filter shall be of a cartridge or approved, equivalent hermetically sealed shaker screen design.

e. The total emission rate of 4.5 lbs VOC/100 lbs cleaned is the sum of the allowable in OAC rule 3745-21-09(BB)(1)(a)(ii) of 3.5 lbs VOC/100 lbs cleaned as dryer losses and 1.0 lb VOC/100 lbs cleaned as miscellaneous losses.

c) Operational Restrictions

(1) This facility shall be limited to four million pounds of materials dry cleaned (dry weight) per rolling, 12-month period.

(2) The permittee shall operate and maintain the dry cleaning system according to the manufacturers' specifications and recommendations.

(3) The permittee shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times.

(4) Any bucket or barrel containing petroleum cleaning solvent or petroleum solvent-laden waste shall be covered to minimize solvent evaporation.

(5) The permittee shall repair within 15 days all perceptible leaks detected pursuant to d)(1). If repair parts must be ordered, either written or verbal order for those parts shall be initiated within 3 working days of detecting such a leak. Such repair parts shall be installed within 15 working days after receipt.

(6) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart JJJ, including the following sections:

60.622(b)	Each petroleum solvent filter shall be a cartridge filter. Cartridge filters shall be drained in their sealed housings for at least 8 hours prior to their removal.

d) Monitoring and/or Recordkeeping Requirements

(1) A weekly leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious to sight, smell, or touch shall be conducted while the equipment is operating. Compliance with this requirement shall be determined through inspection of the following components:

a. hose connections, unions, couplings and valves;

b. door gaskets and seatings;

c. shaker screen housing, gasket and seating;

d. pumps;

e. solvent tanks and storage containers;

f. water separators;

g. distillation unit; and

h. the vacuum pump submerged discharge.

(2) The permittee shall retain for 5 years, on site, a logbook containing the following information:

a. the dry weight of materials dry cleaned each day;

b. the rolling, 12-month total dry weight of materials dry cleaned, to be determined on the first day of each month by summing the daily dry weights of materials dry cleaned in each of the previous 12 months;

c. the dates and results of the weekly dry cleaning system leak inspections; the leak determination method; the name and location of each system component with detected leaks; and the inspector's name and signature;

d. the dates of repairs and records of written or verbal orders for repair parts; and

e. the results of all performance tests of the flow rate of recovered solvent from the solvent-recovery dryer required in f)(2) of these terms and conditions.

These records shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

(3) The permitee shall retain, on site, a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility. These publications shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart JJJ, including the following sections:

60.622(c)	Each manufacturer of an affected petroleum solvent dryer shall include leak inspection and leak repair cycle information in the operating manual and on a clearly visible label posted on each affected dryer. Such information should state: "To protect against fire hazards, loss of valuable solvents, and emissions of solvent to the atmosphere, periodic inspection of this equipment for evidence of leaks and prompt repair of any leaks is recommended. The U.S. Environmental Protection Agency recommends that the equipment be inspected every 15 days and all vapor or liquid leaks be repaired within the subsequent 15 day period."
60.625	The permittee shall maintain a record of the performance test required in 40 CFR 60.624.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit any test result that shows an exceedance of the 3.5 pounds of VOC per one hundred pounds dry weight of articles cleaned and/or any leaks in vapor or liquid lines that are not repaired within fifteen days after identification. The report shall be submitted within 30 days after the occurrence.

(3) The permittee shall submit any leaks in vapor or liquid lines that are not repaired within fifteen days after identification. The report shall be submitted within 30 days after the repair is completed.

(4) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the operational restriction in d)(2)b. of four million pounds of material dry cleaned (dry weight) per rolling, 12-month period.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency)

(5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

4.5 lbs VOC/100 lbs dry cleaned, by dry weight

Applicable Compliance Method:

Compliance shall be calculated using emission factors from AP-42 (4/81 edition, Table 4.1-1) of 2 lbs VOC/100 lbs (dry weight of articles cleaned) for the washer/dryers and 1 lb VOC/100 lbs of miscellaneous losses for well-controlled petroleum solvent dry cleaning operations and OAC rule 3745-21-09(BB).

b. Emission Limitation:

90 tons per rolling, 12-month period of VOC

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the short-term allowable VOC limitation (4.5 lbs VOC/100 lbs cleaned) by the maximum annual pounds of clothes cleaned, dry weight, (4,000,000 pounds, per rolling, 12-month period) divided by 2,000 pounds per ton. Therefore if compliance is shown with the short-term limit allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

3.5 lbs VOC/100 lbs dry cleaned, by dry weight as dryer losses

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the method specified in OAC rule 3745-21-10(L).

g) Miscellaneous Requirements

(1) None