State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
CUYAHOGA COUNTY

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 13-04373

DATE: 6/10/2004

Trotters Dry Cleaners, Incorporated
Vicky Trotter
11401 St. Clair Avenue
Cleveland, OH 44108

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CLAA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 6/10/2004**
Terms and Conditions	**Effective Date: 6/10/2004**

FINAL PERMIT TO INSTALL 13-04373

Application Number:	13-04373
APS Premise Number:	1318008410
Permit Fee:	**$100**
Name of Facility:	Trotters Dry Cleaners, Incorporated
Person to Contact:	Vicky Trotter
Address:	11401 St. Clair Avenue Cleveland, OH 44108

Location of proposed air contaminant source(s) [emissions unit(s)]:
11401 St. Clair Avenue
Cleveland, **Ohio**

Description of proposed emissions unit(s):
Petroleum dry cleaning operation with refrigerated condensor – F001.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting 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, quarterly 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.)

3. 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 five 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 this permit. Such records may be maintained in computerized form.

4. 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 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.

5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Perchloroethylene	**9.4**

Emissions Unit ID: **D001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
D001 - A new Realstar perchloroethylene dry to dry cleaning machine equipped with a refrigerated condenser	OAC rule 3745-31-05 (A)(3)	2,100 gallons of perchloroethylene per rolling 12 month period. 9.4 TPY, perchloroethylene
	40 CFR Part 63, Subparts A & M	See A.2.a below.
	OAC rule 3745-21-09 (AA)	See A.2.a below.

2. Additional Terms and Conditions

2.a The dryer shall be equipped with or vented to a refrigerated vapor condenser whereby there is no exhaust of perchloroethylene vapors to the ambient air throughout the drying cycle, except for when the dryer's door is momentarily opened during loading or unloading.

B. Operational Restrictions

1. 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.

2. 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.

3. 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.

4. The permittee shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility.

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

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

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

8. The outlet gas-vapor stream temperature of the condenser shall be a maximum of 45 degrees Fahrenheit.

9. Perchloroethylene shall not be vented or released to the atmosphere while the dry cleaning machine drum is rotating.

10. The machine shall be operated with a diverter valve to prevent air drawn into the dry cleaning machine (when the machine door is open) from passing through the refrigerated condenser.

C. Monitoring and/or Recordkeeping Requirements

1. 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 weekly visual inspection of the following components while the dry cleaning system is operating.

   a. hose and pipe connections, unions, couplings, and valves;
   b. machine door gaskets and seatings;
   c. filter gasket and seating;
   d. pumps;
   e. solvent tanks and containers;
   f. water separators;
   g. filter sludge recovery;

h. distillation valves;
i. diverter valves;
j. saturated lint from lint basket;
k. cartridge filters and housing;
l. muck cookers;
m. stills; and
n. exhaust dampers.

2. The temperature of the air perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser shall be measured weekly with a temperature sensor. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 45 degrees Fahrenheit to an accuracy of plus or minus 2 degrees Fahrenheit. If the outlet temperature is higher than 45 degrees Fahrenheit, adjustments or repairs shall be made to meet that value. Repair parts shall be ordered within 2 working days after detecting a violation that needs repair parts. Repair parts shall be installed within 5 working days after they are received.

3. 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:

   a. receipts of all perchloroethylene purchase;

   b. the volume of perchloroethylene purchased each month as recorded from perchloroethylene purchases. If no perchloroethylene is purchased during a given month, then the entry in to the log shall be zero gallons;

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

   d. 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;

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

   f. the results and dates of all equipment monitoring required by the permit.

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

   a. control equipment maintenance; and

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

5. 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 shall be retained onsite and be made available upon request.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality and the U.S. EPA (Region 5) in writing of any record from Section C.3.c showing that the perchloroethylene usage limitation specified in Section A.1 was exceeded. The notification shall include a copy of such record and shall be sent to the Director (Cleveland Air Pollution Control) and the USEPA (Region 5) within 45 days after exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s)

   a. Emission Limitation
   Perchloroethylene emissions shall not exceed 9.4 tons/rolling 12- months.

   Applicable Compliance Method
   Compliance is demonstrated by multiplying the yearly consumption of perchloroethylene, in gallons, times the specific density of perchloroethylene (0.00675 ton/gallon) times an emission factor of 0.66 ton perchloroethylene (per the MACT Background Information Document) emitted per ton of perchloroethylene consumed.

F. Miscellaneous Requirements

1. If the total rolling, 12-month consumption of the perchloroethylene exceeds 2100 gallons, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR, 63 Subpart M, within 180 days of the exceedance determination.

2. The yearly perchloroethylene solvent consumption limit is based on the rolling, 12-month solvent consumption calculated according to 40 CFR 63.323(d) is 2100 gallons.