



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

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Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04373

Fac ID: 1318008410

DATE: 7/10/2007

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA



Permit To Install
Terms and Conditions

Issue Date: 7/10/2007
Effective Date: 7/10/2007

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-04373

Application Number: 13-04373
Facility ID: 1318008410
Permit Fee: **\$0**
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):
Administrative Modification to remove the perchloroethylene requirements and change to petroleum.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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Facility ID: 131800841

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 (i.e., postmarked) quarterly 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

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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)

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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.

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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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	0.64

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
D001 - A new 40 lb. dry-to-dry closed loop petroleum dry cleaning machine with refrigerated condenser	OAC rule 3745-31-05 (A)(3)	Organic compound (OC) emissions shall not exceed 0.64 ton/year. See A.2.a. and B.1. below.

Modified

The terms and conditions of OAC rule 3745-21-09 (BB) this permit supercede the terms and conditions of PTI 13-04373 issued on June 10, 2004.

See B.5., C.1., C.2., C.3., C4., and D.1. below.

2. Additional Terms and Conditions

- 2.a** The dry-to-dry cleaning machine shall employ a refrigerated condenser to condense and recover solvent vapors in a closed loop stream of cool air. The cleaning machine shall be properly installed, operated, and maintained.

B. Operational Restrictions

- 1. The permittee shall not employ more than 200 gallons of petroleum solvent during any calendar year.
- 2. The permittee shall drain all cartridge filters in their housing, or other sealed container, for a minimum of eight (8) hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility.
- 3. The permittee shall store all petroleum solvent or petroleum solvent-laden waste in covered buckets, barrels, solvent tanks or solvent containers with no perceptible leaks

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to minimize solvent evaporation.

4. The door of each dry cleaning machine shall be closed at all times except to transfer articles to and from the machine.
5. The dry cleaning machine shall be operated and maintained according to manufacturer's specifications and recommendations.
6. 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. The permittee shall maintain records of the following information in a readily accessible location on site in a log for a period of not less than 5 years, and shall be made available upon verbal or written request:
 - a. receipts of all petroleum solvent purchased;
 - b. the volume of petroleum solvent purchased each month as recorded from petroleum solvent purchases, if no solvent is purchased during a given month, then the entry in to the log shall be zero gallons;
 - c. the amount of petroleum solvent employed for each month, in gallons;
 - d. the amount of petroleum solvent in the distillation bottoms sent out by the facility during that month, in gallons;
 - e. the monthly solvent usage calculation (i.e., c minus d);
 - f. the calendar year solvent usage calculation (i.e., the summation of the monthly solvent usage for each calendar year);
 - g. 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; and,
 - h. the dates of repair and records of written or verbal orders for repair parts.

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2. The permittee shall visually inspect weekly any equipment associated with the use of petroleum solvent to identify liquid or vapor leaks of petroleum solvent.
3. The permittee shall repair any liquid or vapor leak of petroleum solvent within fifteen days after identifying the source of the leak, unless a necessary part is not on hand. The permittee shall order the part within three working days after identifying the source of the leak, if the repair part is not on hand. The permittee shall repair the leak within fifteen days following delivery of the necessary part.
4. 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 in writing of any record from Section C.1.f showing that the facility - wide petroleum solvent usage limitation specified in Section B.1 was exceeded. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 45 days after exceedance occurs.
2. The permittee shall notify the Cleveland Division of Air Quality in writing of any record from section C.1.h showing any leaks in vapor or liquid lines not repaired within fifteen days after identification shall be reported within thirty (30) days after the repair is completed.

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

OC emissions shall not exceed 0.64 ton/year.

- a. Applicable Compliance Method

Compliance shall be determined by multiplying the actual 12-month summation of petroleum solvent for the preceding calendar year, as determined from the record keeping requirements specified in C.1, by the density of the petroleum

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solvent (6.42 lb./gal) and dividing by 2000 lbs/ton:

(gallons petroleum solvent/yr) x (6.42 lb/gallon) x (1 ton/2000 lb) = ton OC/yr

F. Miscellaneous Requirements

None