State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
HAMILTON 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: 14-05370

DATE: 11/5/2002

Robinson Cleaners
Tom Wilker
11 Wyoming Avenue
Cincinnati, OH 45215

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
236 East Town Street, Room 300
Columbus, Ohio 43215

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

CC: USEPA **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 11/5/2002**
Terms and Conditions	**Effective Date: 11/5/2002**

FINAL PERMIT TO INSTALL 14-05370

Application Number:	14-05370
APS Premise Number:	1431492760
Permit Fee:	**$100**
Name of Facility:	Robinson Cleaners
Person to Contact:	Tom Wilker
Address:	11 Wyoming Avenue Cincinnati, OH 45215

Location of proposed air contaminant source(s) [emissions unit(s)]:
11 Wyoming Avenue
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
Dry to dry cleaning machine.

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 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, 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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
OC	2.55

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 - New Union dry-to-dry cleaning machine with refrigerated vapor condenser	OAC rule 3745-31-05(A)(3)	2.55 TPY perchloroethylene per rolling, 12-month period See term A.2.b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subparts A & M
	OAC rule 3745-21-09(AA)	See terms A.2.c and B.1-B.4
	40 CFR Part 63, Subparts A & M	See terms A.2.a and B.5-B-10

2. Additional Terms and Conditions

2.a The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser.

2.b The total consumption of perchloroethylene shall be limited to 375 gallons of perchloroethylene per year, based upon a rolling, 12-month summation.

2.c 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 twenty-five percent (25%) 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 sixty percent (60%) by weight VOC, as determined under Paragraph (J) of OAC rule 3745-21-10.

3. Any disposable filter cartridge which has been used to filter perchloroethylene shall be drained in the filter housing for at least twenty-four (24) hours before being discarded.

4. 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.

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 the 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 two (2) working days after detecting a leak that needs repair parts. Repair parts shall be installed within five (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, 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 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 two (2) working days after detecting a violation that needs repair parts. Repair parts shall be installed within five (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 five (5) years, and shall be made available upon request:

a. Receipts of all perchloroethylene purchases.

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.

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

4. The following records shall be kept for a period of not less than five (5) years:

a. Control equipment maintenance.

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

D. Reporting Requirements

1. The permittee shall submit annual reports which contain the following information:

a. A summary of the results of all tests conducted to determine compliance with the VOC content limitations for the waste from a diatomaceous earth filter and the waste from a solvent still.

b. The annual usage of perchloroethylene, in gallons.

c. The annual amount of fabric dry cleaned with perchloroethylene, in pounds.

The annual reports shall be submitted by January 31 of each year.

2. If the yearly perchloroethylene solvent consumption limit, calculated pursuant to Section F.2. of this permit, is exceeded by the rolling annual perchloroethylene consumption calculation required by the record keeping requirements section of this permit, then the permittee shall submit a signed statement as required by 40 CFR 63.324(c).

E. Testing Requirements

1. Compliance with the perchloroethylene emission limit shall be determined by multiplying the perchloroethylene OC content (13.6 lbs OC/gallon) by the annual gallons of perchloroethylene consumed. The perchloroethylene emission limit is based on the reported maximum annual perchloroethylene consumption.

2. Compliance with the annual perchloroethylene consumption limitation shall be determined using the records maintained in accordance with Section C.3.

3. Compliance with the VOC content limitations for waste from diatomaceous earth filter and the waste from a solvent still shall be determined using the method and procedure in OAC rule 3745-21-10(J).

F. Miscellaneous Requirements

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

2. The yearly perchloroethylene solvent consumption limit based on the yearly solvent consumption calculation according to 40 CFR 63.323(d) is 375 gallons.

3. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance, in violation of OAC rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this emissions unit into compliance.