OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

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

O.E.P.A.
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07/22/04

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

D001 (Dry Cleaner) Closed Loop Dry-to-Dry Dry Cleaning Machine with Refrigerated Condenser and Carbon Absorbtion

Catola's Dry Cleaners Inc. (06-79-02-0172)
Louis R. Catola
111 Beaver Ave. NE
New Philadelphia, OH 44663

Dear Louis R. Catola:

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

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

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

If you have any questions, please contact Southeast District Office.

Sincerely,

Michael W. Ahern

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

cc: Southeast District Office

OhioEPA

State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 07/22/04

Expiration Date: 07/22/09

This document constitutes issuance to:

Facility ID: 06-79-02-0172
Catola's Dry Cleaners Inc.
111 Beaver Ave. NE
New Philadelphia, OH 44663

of a permit to operate for:

D001 (Dry Cleaner)
Closed Loop Dry-to-Dry Dry Cleaning Machine with Refrigerated Condenser and Carbon Absorbtion

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

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

2. Permit to Install Requirement

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

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

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

cause exists for modifying, rec[illegible]ing or revoking this permit or to dete[illegible]e compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
D001 - New dry-to-dry perchloroethylene dry cleaning machine vented to a refrigerated condenser and a non-vented carbon adsorber	OAC rule 3745-31-05(A)(3) PTI # 06-07508	The permittee shall consume less than 140 gallons of perchloroethylene per rolling, 12-month period. Perchloroethylene emissions shall not exceed 0.63 ton per year. The requirements of this rule also include compliance with the requirements of 40 CFR part 63, Subparts A and M and OAC 3745-21-09(AA)
	40 CFR Part 63, Subparts A and M	See A.2.a, A.2.b, B.5. through B.10, and D.1, below.
	OAC rule 3745-21-09(AA)	See A.2.b, B.1 through B.4 and C.1, below.

2. **Additional Terms and Conditions**

2.a This facility is a new small area source as defined in 40 CFR Part 63 Subpart M.

2.b This emissions unit 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 emissions unit door is momentarily opened during loading and unloading.

2.c The annual amount of fabric cleaned is less than 60,000 pounds therefore, this facility is exempt from OAC rule 3745-21-09(AA)(1)(a) per OAC rule 3745-21-09(AA)(2)(c).

B. Operational Restrictions

1. The waste from any diatomaceous earth filter which has been used to filter perchloroethylene is to contain no more than twenty-five per cent by weight volatile organic compounds, as determined under paragraph (J) of rule 3745-21-10 of the Administrative Code.

2. The waste from any distillation operation (solvent still) which has been used to distill perchloroethylene is to contain no more than sixty per cent by weight volatile organic compounds, as determined under paragraph (J) of rule 3745-21-10 of the Administrative Code.

3. Any disposable filter cartridge which has been used to filter perchloroethylene is to be drained in the filter housing for at least twenty-four 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 is not to 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.

B. Operational Restrictions (continued)

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 Record Keeping 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 biweekly 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.

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

2. The permittee shall maintain a log of the following records:

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.

g. Control equipment maintenance.

h. The amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.
□
i. The annual perchloroethylene solvent consumption, in gallons.

j. The results of all tests conducted to determine compliance with the limitations contained in Sections B.1 and B.2.

3. 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.

4. 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 requires repair parts. Repair parts shall be installed within 5 working days after they are received.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any record 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 Ohio EPA Southeast District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Emission Limitation:

Perchloroethylene emissions shall not exceed 0.63 ton per year.

Compliance Method:

Compliance with the mass emission limit of 0.63 ton perchloroethylene per year is demonstrated by multiplying the annual usage of perchloroethylene in gallons (recorded in Section C.2.i) times the percentage (0.66) of perchloroethylene assumed to be emitted to the atmosphere (including vent and fugitive emissions) times the specific density of perchloroethylene (0.00675 ton/gallon).

(140 gallons/year of perchloroethylene used) x (0.00675 ton/gal) x (0.66) = 0.624 TPY

E. Testing Requirements (continued)

2. Emission Limitation:

The permittee shall consume less than 140 gallons of perchloroethylene per rolling, 12-month period.

Compliance Method:

Compliance with the maximum usage limitation of less than 140 gallons perchloroethylene per year shall be determined through records kept in accordance with Section C.2.c, above. Specifically, the permittee shall add the amount of perchloroethylene purchased each month to the amount purchased in the previous 11 months.

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 63, Subpart M, within 180 days of the exceedance determination.

2. The yearly perchloroethylene solvent consumption limit, based on the yearly solvent consumption calculated according to 40 CFR 63.323(d), is less than 140 gallons.

3. If the total yearly consumption of perchloroethylene is equal to or greater than 140 gallons per year, this facility becomes a large area source and must comply with the requirements for a large area source per 40 CFR Part 63, Subpart M, within 180 days of the exceedance.