State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

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

05/19/08

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate General Permit

Covedale Cleaners (14-31-07-4296)
Robert Morgan
2107 Ferguson Road
Cincinnati, OH 45238

Dear Robert Morgan:

The enclosed General Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated for each Permit as indicated below:

D001 (Dry to Dry Machine) Dry to Dry Cleaning Machine	Up to 2,100 gallons per rolling 12-month period perc dry-to-dry installed befor

The permit for each emissions unit identified in the following pages consists of Section 1, Part I (authorization to operate and General Terms and Conditions), and; Section 2, Part II (facility-wide terms for each General Permit), and Part III (the applicable General Permit for the specified emissions unit). Each permit constitutes a separate and enforceable document.

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 Compliance Assistance and Pollution Prevention at (800) 329-7518. For more information related to air pollution control in Ohio, visit www.epa.state.oh.us/dapc.

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

If you have any questions, please contact Hamilton County Dept. of Environmental Services.

Sincerely,

Michael W. Ahern

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

cc: Hamilton County Dept. of Environmental Services

State of Ohio Environmental Protection Agency

Final General Permit To Operate An Emissions Unit

Effective Date: 05/19/08

Expiration Date: 05/19/13

This document constitutes issuance to:

Facility ID: 14-31-07-4296
Covedale Cleaners
2107 Ferguson Road
Cincinnati, OH 45238

of a permit to operate for:

Emissions Unit ID & Permittee Description	Applicable General Permit Terms (see attached)
D001 (Dry to Dry Machine) Dry to Dry Cleaning Machine	Up to 2,100 gallons per rolling 12-month period perc dry-to-dry installed befor

Each permit for each emissions unit identified above consists of Section 1, Part I (authorization to operate and General Terms and Conditions), Section 2, Part II (facility-wide terms for each General Permit), and Part III (the applicable General Permit for the specified emissions unit). Each permit constitutes a separate and enforceable document.

You will be contacted six months prior to the expiration date regarding the renewal of each permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. Each 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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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 (i.e., post marked) 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, 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.

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

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

Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

MGP Number: MGP 01503071016

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

MGP Number: MGP 01503071016

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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 - Dry to Dry perchloroethylene (PCE) dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A)(3)	Perchloroethylene usage at this facility shall not exceed 2100 gallons per rolling, 12-month period. Emissions of perchloroethylene from this facility shall not exceed 9.36 tons per rolling, 12-month period. The requirements of this rule also include compliance with OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subparts A & M.
OAC rule 3745-21-09(AA)	See terms A.I.2.b and A.II. 1-4.
40 CFR Part 63, Subparts A & M	See terms A.I.2.a, A.I.2.c and A.II. 5-10.

2. Additional Terms and Conditions

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

2.b The dryer is 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.

2.c The permittee must comply with all of the requirements listed for an area source per 40 CFR Part 63, Subpart M.

II. Operational Restrictions

1. The waste from any diatomaceous earth filter which has been used to filter perchloroethylene shall contain no more than twenty-five per cent (25%) by weight perchloroethylene, 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 per cent (60%) by weight perchloroethylene, 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. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still.

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 gas-vapor stream temperature at the outlet of the condenser shall not be greater than 45 degrees Fahrenheit before the end of the cool down cycle while the gas-vapor stream is flowing through the condenser.

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 to prevent air drawn into the dry cleaning machine (when the machine door is open) from passing through the refrigerated condenser.

III. Monitoring and/or Record keeping Requirements

1. The following components shall be visually inspected each week for perceptible leaks 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 or muck cookers;
    h. distillation-unit;
    i. diverter valves;
    j. saturated lint from the lint basket;
    k. cartridge filters and housings;
    l. stills; and
    m. exhaust dampers.

    Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills this requirement.

    Leaks are to be repaired within 24 hours after being detected. If repair parts are to be ordered, the order shall be initiated within two (2) working days after detecting the leak. The repair parts shall be installed within five (5) working days after they are received.

2. Beginning no later than July 28, 2008, the components listed in Section A.III.1 shall be inspected monthly for vapor leaks using a halogenated hydrocarbon detector or PCE gas analyzer. The inspections shall be done while the components are in operation. The analyzer shall be operated according to the manufacturer's instructions. Specifically, the operator shall place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface of the periphery. The week in which a monthly inspection is performed using a halogenated hydrocarbon detector or PCE gas analyzer shall satisfy the requirements for the weekly visual inspection for perceptible leaks for that same week as required in Section A.III.1.

Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

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3. The following parameters, as applicable, shall be monitored on a weekly basis:

   a. The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.

   b. If the machine is not equipped with refrigeration system pressure gauges, 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, prior to the end of the cool-down or drying cycle, while the gas-vapor stream is flowing through the condenser, adjustments or repairs shall be made to lower the outlet temperature to less than or equal to 45 degrees Fahrenheit. 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.

4. 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 purchase receipts. If no perchloroethylene is purchased during a given month, then the records shall state zero gallons.

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

   d. The dates of all weekly visual inspections and monthly vapor leak inspections conducted with the use of a halogenated hydrocarbon detector or PCE gas analyzer 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 date and temperature sensor monitoring results, as required in Section A.III.3 above.

g. A description of control equipment maintenance performed and the date.

h. 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 on site and shall be made available upon request.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) and the U.S. EPA (Region 5) in writing of any record from Section A.III.4 showing that the perchloroethylene usage limitation of 2100 gallons per rolling, 12-month period specified in Section A.I.1 was exceeded. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) and the U.S. EPA (Region 5) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the mass emission limit listed in Section A.I.1 of 9.36 tons of perchloroethylene per rolling, 12-month period is demonstrated by multiplying the rolling, 12-month consumption of perchloroethylene in gallons (required in Section A.III.4.c) by 0.66 (the percentage of perchloroethylene assumed to be emitted to the atmosphere including vent and fugitive emissions) and by 0.00675 ton/gallon (the specific density of perchloroethylene).

2. Compliance with the annual perchloroethylene consumption limitation shall be determined using the records maintained in accordance with Section A.III.4.

VI. Miscellaneous Requirements

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.

Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

MGP Number: MGP 01503071016

B. State Only Enforceable Section

I. 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 - Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005**.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

MGP Number: MGP 01503071016

None.