Facility ID: 1677010969 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677010969 Emissions Unit ID: D001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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 - Two new perchloroethylene dry-to-dry cleaning machines, both controlled by refrigerated condensers and carbon adsorption, together consuming between 140 and 2100 gallons perchloroethylene per year, and cleaning more than 60, 000 pounds of fabric per year	OAC rule 3745-31-05(A)(3) (PTI 16-02119)	See A.2.a and A.2.b below.
	OAC rule 3745-21-09(AA)	See sections A.2 "Additional Terms and Conditions"; and B "Operational Restrictions" below for applicable requirements.
Columbia model 931 - installed in 1997 Suprema model 162 S - installed in 2000	40 CFR Part 63, Subparts A and M	See sections A.2 "Additional Terms and Conditions"; and B "Operational Restrictions" below for applicable requirements.

2. **Additional Terms and Conditions**

   (a) The permittee shall consume no more than 400 gallons of perchloroethylene per rolling, 12-month period.
   Perchloroethylene emissions shall not exceed 2.7 tons per rolling, 12-month period.
   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.
   The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser or an equivalent control device.

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. Any disposable filter cartridge which has been used to filter perchloroethylene shall be drained in the filter housing for at least 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 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 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 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 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 (rolling, 12-month 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; and

   h. 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.

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 on site and be made available upon request.

D. **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 C.3.c showing that the perchloroethylene usage limitation specified in section A.2 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.

E. **Testing Requirements**

1. Compliance with the mass emission limit listed in section A.2 of 2.7 tons of perchloroethylene per rolling, 12-month period is demonstrated by multiplying the rolling, 12-month consumption of perchloroethylene in gallons (required in section C.3.c) 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).

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. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessarybecause the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the

composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.