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Facility Name: **FIERRO INC.**
Application Number: **14-4601**
Date: **July 22, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code

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(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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Fierro Inc.** located in **Hamilton** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source <u>Number</u>	Source Identification <u>Description</u>
D001	Machine #1: Existing Suprema 350CC dry-to-dry cleaning machine with refrigerated condenser Machine #2: Existing Suprema 350CC dry-to-dry cleaning machine with refrigerated condenser Machine #3: Existing Suprema 350CC dry-to-dry cleaning machine with refrigerated condenser

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BAT
Determination

Compliance
with terms and
conditions of
this permit
and federal
EPA MACT
standard

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Applicable
Federal &
OAC Rules

3745-31-05
3745-15-07
3745-21-09 (AA)
40 CFR Part 63
Subparts A & M
3745-21-10 (J)

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Permit
Allowable Mass
Emissions
and/or
Control/Usage
Requirements

540 gal per
rolling
12-month
period
consumption
limit of
perchloroethy-
lene

3.7 tons per
year
perchloroethy-
lene

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Perchloroethylene	3.7

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, Ohio 45210** .

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, Ohio 45210**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser or an equivalent control device. 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.
2. The yearly perchloroethylene solvent consumption limit based on the yearly solvent consumption calculation according to 40 CFR 63.323(d) is 540 gallons.

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.

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.

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.

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.

2. The owner or operator shall store all perchloroethylene

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and wastes that contain perchloroethylene in solvent tanks or solvent containers which no perceptible leaks.

The door of each dry cleaning machine shall be closed at all times except to transfer articles to and from the machine.

The dry cleaning machine shall be operated and maintained according to manufacturer's specifications and recommendations.

The outlet gas-vapor stream temperature of the condenser shall be a maximum of 45 degrees Fahrenheit.

Perchloroethylene shall not be vented or released to the atmosphere while the dry cleaning machine drum is rotating.

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 Recordkeeping Requirements

1. A weekly 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;

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- 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

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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 amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.
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. If the yearly perchloroethylene solvent consumption limit of 540 gallons 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. 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.