State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN 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: 01-08918
Fac ID: 0125043074
DATE: 12/16/2004

Sterling Cleaners
John Chianis
626 Mawyer Drive
Worthington, OH 43085

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/16/2004**
Terms and Conditions	**Effective Date: 12/16/2004**

FINAL PERMIT TO INSTALL 01-08918

Application Number:	01-08918
Facility ID:	0125043074
Permit Fee:	**$100**
Name of Facility:	Sterling Cleaners
Person to Contact:	John Chianis
Address:	626 Mawyer Drive Worthington, OH 43085

Location of proposed air contaminant source(s) [emissions unit(s)]:
2595 South Hamilton Road
Columbus, **Ohio**

Description of proposed emissions unit(s):
Hydro carbon 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

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) 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	0.96

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 - 95 lb. dry-to-dry closed loop petroleum dry cleaning machine with refrigerated condenser	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.96 ton/year. See A.2.a. and B.1. below.
	OAC rule 3745-21-09(BB)	See B.2., C.1., C.2., C.3., and D.1. below.

2. Additional Terms and Conditions

2.a The dry-to-dry cleaning machine shall employ a refrigerated condenser to condense and recover solvent vapors in a closed loop stream of chilled air. The cleaning machine shall be properly installed, operated, and maintained.

B. Operational Restrictions

1. The permittee shall not employ more than 300 gallons of petroleum solvent during any calendar year.

2. The permittee shall store petroleum solvent or petroleum solvent-laden waste in a covered bucket or barrel to minimize solvent evaporation.

3. The permittee shall drain all cartridge filters in their housing, or other sealed container, for a minimum of eight hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility.

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

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

6. 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. The permittee shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the director upon verbal or written request:

   a. receipts of all petroleum solvent purchases;

   b. the volume of petroleum solvent purchased each month as recorded from petroleum solvent purchases, if no solvent is purchased during a given month, then the entry in to the log shall be zero gallons;

   c. the amount of petroleum solvent employed for each month, in gallons;

   d. the amount of petroleum solvent in the distillation bottoms sent out by the facility during that month, in gallons;

   e. the monthly solvent usage calculation (i.e., c minus d);

   f. the calendar year solvent usage calculation (i.e., the summation of each successive month's solvent usage to the previous total solvent usage);

   g. 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; and,

   h. the dates of repair and records of written or verbal orders for repair parts to document completion of repairs.

2. The permittee shall visually inspect weekly any equipment associated with the use of petroleum solvent to detect any liquid or vapor leaks of petroleum solvent.

3. The permittee shall repair any liquid or vapor leak of petroleum solvent within fifteen days after identifying the source of the leak, unless a necessary part is not on hand. The permittee shall order the part within three working days after identifying the source of the leak, if the repair part is not on hand. The permittee shall repair the leak within fifteen days following delivery of the necessary part.

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. The permittee shall provide a report to the Ohio EPA Central District Office within thirty days of an occurrence of the following:

   a. any leaks in vapor or liquid lines not repaired within fifteen days after identification shall be reported within thirty days after the repair is completed; and,

   b. a determination that the facility-wide consumption of petroleum solvent exceeded 300 gallons of solvent during any one year period.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions for the petroleum dry cleaning machine shall be determined in accordance with the following method(s):

   a. Emission Limitation:

      OC emissions shall not exceed 0.96 ton per year.

      Applicable compliance method:

      Compliance shall be based upon a 12-month summation for the proceeding calendar year of the recordkeeping requirements specified in C.1 and multiplying by the density of the petroleum solvent (6.42 lb./gal):

      (300 gallons petroleum solvent/yr) x (6.42 lb/gallon) x (1 ton/2000 lb) = 0.96 ton OC/yr

F. Miscellaneous Requirements

None