



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/8/2010

Jim Fierro
Tri-Star Industrial Cleaning
635 SHEPHERD DR
CINCINNATI, OH 45215

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431254010
Permit Number: P0106722
Permit Type: Renewal
County: Hamilton

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Kevin Boyce," 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 at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: HCDOES



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Tri-Star Industrial Cleaning operates three emissions units (P001, P005, and P006) for the purpose of reclaiming solvents from solvent laden gloves and rags from various industries. The solvents are then shipped by railcar to another facility for distillation.

This permit (P0106722) is a first issue permit after PTI for emissions units P001, P005, and P006. PTIO P0106722 will supersede PTI 14-05784, as issued on December 22, 2005, for emissions unit P001. PTIO P0106722 will supersede PTI 14-06033, as issued on April 22, 2008, for emissions units P005 and P006.

No changes to permit terms and conditions were requested by the facility.

3. Facility Emissions and Attainment Status:

Tri-Star Industrial Cleaning is located in Hamilton County which is currently non-attainment for particulate matter 2.5 microns and less in diameter (PM_{2.5}) and attainment for all other criteria pollutants. Tri-Star Industrial Cleaning is a true minor non-Title V facility for volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions, based on its unrestricted potential to emit VOC being less than 100 tons per year (TPY) and unrestricted potential to emit HAPs being less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs.

4. Source Emissions:

Ohio Administrative Code (OAC) rule 3745-31-05(A)(3) applies to emissions units P001, P005, and P006. Best available technology (BAT) is considered employing mass emission limitations for P001, P005, and P006, and the annual production limitation and the use of a refrigerated vapor condenser for P001. BAT was not re-evaluated in this permitting action due to the permitting action being a first issue permit after PTI. Installation of P001 began prior to SB 265 went into effect; therefore BAT applies in the pre-SB 265 format. The BAT emissions limitation was carried over from PTI 14-05784 for P001. PTI 14-06033 for emissions units P005 and P006 used the post SB 265 exemption for emissions less than 10 tons per year. PTIO P0106722 was updated to include the pre-SB 265 BAT emissions limitation for P005 and P006, as well.

OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006, will apply to emissions units P005 and P006 once U.S. EPA approves this version of OAC rule 3745-31-05 for Ohio's State Implementation Plan (SIP).

Changes to terms and conditions made in PTIO P0106722 include updating the threshold limit value (TLV) and maximum acceptable ground-level concentration (MAGLC) for toluene for emissions units P001, P005, and P006; removing the reporting requirement for annual VOC summation reports for P001; and, removing the reporting requirement for a notification after 45 days of when a weekly inspection was not conducted for emissions units P001, P005, and P006.



5. Conclusion:

This permitting action contains no federally enforceable terms and conditions for the emissions units.

6. Please provide additional notes or comments as necessary:

Recommend approval of P0106722. It is recommended that P0106722 be issued direct-final, as it is a true minor non-Title V renewal permit for emissions units P001, P005, and P006.

Permit Fee: P001 (PWR: 0-1000 lbs/hr) No fee
P005 (PWR: 0-1000 lbs/hr) No fee
P006 (PWR: 0-1000 lbs/hr) No fee
Total: No fee

(No fee based on renewal permit)

Prepared by: Amy Kesterman
Date: September 1, 2010

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	11.89



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Tri-Star Industrial Cleaning**

Facility ID: 1431254010
Permit Number: P0106722
Permit Type: Renewal
Issued: 9/8/2010
Effective: 9/8/2010
Expiration: 5/28/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
Tri-Star Industrial Cleaning

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Authorization

Facility ID: 1431254010

Application Number(s): A0040065

Permit Number: P0106722

Permit Description: First issue permit after PTI 14-05784 for P001, and first issued permit after PTI 14-06033 for P005 and P006, being processed as a renewal.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 9/8/2010

Effective Date: 9/8/2010

Expiration Date: 5/28/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Tri-Star Industrial Cleaning
635 SHEPHERD DR
Cincinnati, OH 45215

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106722
Permit Description: First issue permit after PTI 14-05784 for P001, and first issued permit after PTI 14-06033 for P005 and P006, being processed as a renewal.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID: P001
Company Equipment ID: Petro-Miser Solvent Recovery Dryer 1
Superseded Permit Number: 14-05784
General Permit Category and Type: Not Applicable

Group Name: P005 P006 Reclamation Units

Emissions Unit ID:	P005
Company Equipment ID:	Midwest Hydrocarbon Reclamation Unit No.1
Superseded Permit Number:	14-06033
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Midwest Hydrocarbon Reclamation Unit No. 2
Superseded Permit Number:	14-06033
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a

timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. P001, Petro-Miser Solvent Recovery Dryer 1

Operations, Property and/or Equipment Description:

Petro-Miser Solvent Recovery Dryer 1

a) 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. d)(5) and d)(6).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the solvent recovery dryer shall not exceed 1.0 pound per hour and 3.13 tons per year (TPY).</p> <p>See b)(2)c., b)(2)d., b)(2)e., c)(1), c)(2), c)(3), c)(4), and c)(5).</p>

(2) Additional Terms and Conditions

a. The hourly emissions limitation outlined in b)(1) is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.

b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the annual production limitation, the emissions limitations and the use of a refrigerated vapor condenser.

- c. The vacuum feed pump discharge shall utilize a submerged fill pipe when discharging solvent to the system feed tank. There shall be no visible emissions, as bubbles, from the vacuum pump submerged discharge.
 - d. The dryer shall be of a solvent-recovery design.
 - e. The dryer shall be equipped with or vented to a refrigerated vapor condenser whereby there is no exhaust of vapors to the ambient air throughout the drying cycle, except for when the dryer's door is momentarily opened during loading or unloading.
- c) Operational Restrictions
- (1) The maximum annual production rate for this emissions unit shall not exceed 626,080 pounds of dry material.
 - (2) Any container containing solvent-laden materials shall employ a tightly fitted cover to minimize solvent evaporation.
 - (3) The door of each solvent recovery dryer shall be closed at all times except to transfer articles to and from the machine.
 - (4) The solvent recovery dryer shall be operated and maintained according to manufacturer's specifications and recommendations.
 - (5) The permittee shall repair all perceptible leaks detected pursuant to d)(2).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the production rate, which shall then be summarized at the end of each calendar year.
 - (2) A leak detection and repair program to inspect all equipment for leaks that are obvious from sight, smell, or touch shall be conducted. Any equipment found to be leaking 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. Compliance with this requirement shall be determined through weekly visual inspections of the following components, if applicable, while the solvent recovery dryer 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.
- (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 solvent waste analysis reports.
 - b. The volume of solvent waste sent out each month for distillation as recorded from solvent waste receipts.
 - c. The volume of solvent waste sent out each year for distillation as recorded from monthly solvent waste receipts.
 - d. The results of all visual inspections, including the dates when the solvent recovery dryer components are inspected for leaks and the name or location of the solvent recovery dryer 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 processed through the solvent recovery dryer, from January 1 to December 31 of each year, in pounds of dry material.
- (4) A copy of the design specifications and the operating manuals for each solvent recovery dryer and each emission control device located at the premise shall be retained on site and shall be made available upon request.
- (5) The permit to install and operate (PTIO) for this emissions unit P001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install and operate application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install and operate application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level

Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 75.36

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 322

MAGLC (ug/m³): 1,794

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled “American Conference of Governmental Industrial Hygienists (ACGIH),” than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (6) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy”:

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the emission limitation in b)(1) shall be determined in accordance with the following method(s):
 - a. Emissions Limitations:

Volatile organic compound (VOC) emissions from the solvent recovery dryer shall not exceed 1.0 pound per hour and 3.13 tons per year (TPY).

Applicable Compliance Method:

Compliance with the hourly emissions limitation shall be determined by multiplying the maximum hourly production rate (100 lb/hr of dry rags) by the emissions factor (1 lb VOC/100 lbs dry rags). Annual emissions shall be determined by multiplying the annual production rate (626,080 lbs/year of dry rags) by the emissions factor (1 lb VOC/100 lbs dry rags) and dividing by 2000 lbs/ton.
- (2) Compliance with the production limitation in c)(1) shall be determined by the monitoring and record keeping requirements found in d)(1).

g) Miscellaneous Requirements

- (1) If probable cause exists indicating this emissions unit is causing or contributing to a nuisance, in violation of OAC rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program that will bring this emissions unit into compliance.

2. Emissions Unit Group - P005 P006 Reclamation Units: P005, P006,

EU ID	Operations, Property and/or Equipment Description
P005	Midwest Hydrocarbon Reclamation Unit No.1
P006	Midwest Hydrocarbon Reclamation Unit No. 2

a) 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. d)(4), d)(5), d)(6), and d)(7).

(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.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 1.0 pound per hour and 4.38 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)b.

(2) **Additional Terms and Conditions**

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.

EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) A leak detection and repair program to inspect all equipment for leaks that are obvious from sight, smell, or touch shall be conducted. Any equipment found to be leaking 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. Compliance with this requirement shall be determined through weekly visual inspections of the following components, if applicable, while the solvent recovery dryer 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 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 solvent waste analysis reports.
 - b. The volume of solvent waste sent out each month for distillation as recorded from solvent waste receipts.
 - c. The volume of solvent waste sent out each year for distillation as recorded from monthly solvent waste receipts.
 - d. The results of all visual inspections, including the dates when the solvent recovery dryer components are inspected for leaks and the name or location of the solvent recovery dryer 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 processed through the solvent recovery dryer, from January 1 to December 31 of each year, in pounds of dry material.
- (3) A copy of the design specifications and the operating manuals for each solvent recovery dryer and each emission control device located at the premise shall be retained on site and shall be made available upon request.
- (4) The permit-to-install and operate (PTIO) for this/these emissions unit(s) P005 and P006 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for

Chemical Substances and Physical Agents Biological Exposure Indices”;
or

- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “24” hours per day and “7” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 75.36

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,072

MAGLC (ug/m³): 1,794

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) P005 and P006, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the emission limitation in b)(1) shall be determined in accordance with the following method(s):
 - a. Emissions Limitations:

Volatile organic compound (VOC) emissions shall not exceed 1.0 pound per hour and 4.38 tons per year (TPY).

Applicable Compliance Method:

Compliance with the hourly emissions limitation shall be determined by multiplying the maximum hourly production rate (100 lb/hr of dry rags) by the emissions factor (1 lb VOC/100 lbs dry rags). Annual emissions shall be determined by multiplying the hourly production rate (100 lb/hr of dry rags) by the maximum hours per year (8,760 hours/year), then multiplying by the emissions factor (1 lb VOC/100 lbs dry rags) and dividing by 2000 lbs/ton.

g) Miscellaneous Requirements

- (1) If probable cause exists indicating this emissions unit is causing or contributing to a nuisance, in violation of OAC rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program that will bring this emissions unit into compliance.