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Facility Name: **Dry Cleaning Express**

Application Number: **01-7402**

Date: **June 17, 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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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Dry Cleaning Express** located in **Franklin** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
D001	Machine No. 1: Existing Flourmatic dry-to-dry cleaning machine with refrigerated condenser	Compliance with permitted limits and terms and conditions contained within this permit, along with MACT rules and regulations.	3745-31-05 NESHAP (40 CFR Part 63, Subparts A and M) 3745-21-09 (AA) 3745-21-10 (J)	1.02 tons of perchloro-ethylene per rolling 12 month period. Consumption of no more than 225 gallons of perchloro-ethylene per rolling 12-month period.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	Perchloroethylene
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
<u>Tons/Year</u>				
1.02				

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NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source Number</u>	<u>Source Description</u>	<u>NESHAP Regulation (Subpart)</u>
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D001	Dry-to-Dry	A and M
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The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

- a. date of commencement of construction (no later than 30 days after such date);
- b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
- c. actual date of initial start-up (within 15 days after such date); and
- d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Ohio EPA, Central District Office**
3232 Alum Creek Drive
Columbus, OH 43207-3417

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and

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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 **Ohio EPA, Central District Office 3232 Alum Creek Drive, Columbus, OH 43207-3417.**

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

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

D001 - Existing Flourmatic dry-to-dry cleaning machine with refrigerated condenser.

A. Control Equipment Requirement

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

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2. 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.

B. Operational Requirements

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 4 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 owner or operator 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 manufacture's specifications and recommendations.
8. The outlet gas-vapor stream temperature of the

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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 Recordkeeping 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;

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- i. diverter valves;
- j. saturated lint from the lint basket;
- k. cartridge filters and housings;
- l. muck cookers;
- m. stills; and,
- n. exhaust dampers.

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.

- 2. The following records shall be kept on site in a log for a period of not less than 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 (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

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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; and,
 - f. the results and dates of all equipment monitoring required by this permit.
3. The following records shall be kept for a period of not less than three years:
- a. control equipment maintenance; and,
 - b. 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 225 gallons is exceeded by the rolling annual perchloroethylene consumption calculation required by the recordkeeping requirements section of this permit, then the permittee shall submit a signed statement as required by 40 CFR 63.324(c).

E. Miscellaneous

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.

The yearly perchloroethylene solvent consumption limit based on the yearly solvent consumption calculated according to 40 CFR 63.323(d) is 225 gallons.