



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/30/2012

HARVEY SIEGEL
COIT SERVICES OF OHIO INC
23580 MILES ROAD
BEDFORD HEIGHTS, OH 44128

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318048301
Permit Number: P0095140
Permit Type: Renewal
County: Cuyahoga

Certified Mail

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

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 Josh Mandel," 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 Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
COIT SERVICES OF OHIO INC**

| | |
|----------------|------------|
| Facility ID: | 1318048301 |
| Permit Number: | P0095140 |
| Permit Type: | Renewal |
| Issued: | 5/30/2012 |
| Effective: | 5/30/2012 |
| Expiration: | 5/30/2022 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
COIT SERVICES OF OHIO INC

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Authorization

Facility ID: 1318048301
Application Number(s): A0026665
Permit Number: P0095140
Permit Description: Renewal permit for a Firbimatic dry to dry cleaning machine using petroleum based DF 2000. Subject to 40 CFR Part 60 Subpart JJJ. PTI 13-03820 issued on 4/26/2001. This will be first PTIO.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/30/2012
Effective Date: 5/30/2012
Expiration Date: 5/30/2022
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

COIT SERVICES OF OHIO INC
23580 MILES ROAD
Bedford Heights, OH 44128

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

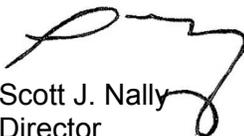
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erievue Plaza
Cleveland, OH 44114
(216)664-2297

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


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0095140

Permit Description: Renewal permit for a Firbimatic dry to dry cleaning machine using petroleum based DF 2000. Subject to 40 CFR Part 60 Subpart JJJ. PTI 13-03820 issued on 4/26/2001. This will be first PTIO.

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

| | |
|-----------------------------------|--------------------|
| Emissions Unit ID: | D001 |
| Company Equipment ID: | Drycleaning Drapes |
| Superseded Permit Number: | 13-03820 |
| 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 Cleveland Division of Air Quality 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.

¹Permittees 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).

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.

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.
2. The following emissions units contained in this permit to 40 CFR Part 60, Subpart JJJ, Standards of Performance for New Stationary Sources for Petroleum Dry Cleaners from dry cleaning machine and dryers: D001.

The complete NSPS requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality (CDAQ).

The permittee must comply with all applicable requirements of 40 CFR Part 60, Subpart JJJ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 60, Subpart JJJ, and Subpart A.

C. Emissions Unit Terms and Conditions



1. D001, Drycleaning Drapes

Operations, Property and/or Equipment Description:

Firbimatic hydrocarbon (DF-2000) dry to dry cleaning machine equipped with a refrigerated condenser used for drycleaning drapes.

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. None.

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

a. None.

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) PTI 13-03820 issued on 4/26/2001 | Volatile organic compound (VOC) emissions shall not exceed 0.49 lb/hr and 2.16 tons/yr. |
| b. | OAC rule 3745-21-09(BB)(1)(a)(ii) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |



| | | |
|----|---|--|
| c. | 40 CFR Part 60, Subpart JJJ (40 CFR 60.620 – 625)[In accordance with 40 CFR 60.620 this emissions unit is an existing petroleum dry cleaning facility subject to the emissions limitations/control measures specified in this section.] | See Section B.2. above. See c)(1), c)(2), d)(2), and f)(2) below. |
| d. | 40 CFR 60.1-19 | General Provisions to Subpart JJJ 40 CFR 60.1-19. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The dry cleaning dryer shall be a solvent recovery dryer. The solvent recovery dryer shall be properly installed, operated and maintained.
- (2) Any petroleum solvent filter installed shall be a cartridge filter. The cartridge filters shall be drained in their sealed housings for at least 8 hours prior to their removal.
- (3) Any bucket or barrel which contains petroleum solvent or petroleum solvent-laden waste shall be covered to minimize solvent evaporation.
- (4) Any liquid or vapor leak of petroleum solvent shall be repaired within fifteen days after identifying the source of the leak, unless a necessary repair part is not on hand. If a repair part is not on hand, it shall be ordered within three working days after identifying the source of the leak. The leak shall be repaired within fifteen days following the delivery of the necessary repair part.

d) Monitoring and/or Recordkeeping Requirements

- (1) Any equipment associated with the use of petroleum solvent shall be visually inspected weekly to identify any liquid leaks of petroleum solvent.
- (2) The permittee shall maintain a record of the performance test required in f)(2) below.
- (3) 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 Cleveland Division of Air Quality (CDAQ) upon verbal or written request:
 - a. Annual solvent consumption
 - b. The results of any leak checks, including, at a minimum, the following information:

- i. Date of inspection.
- ii. Findings (may indicate no leaks discovered or location, nature, and severity of each leak).
- iii. Leak determination method.
- iv. Corrective action (date each leak repaired and reasons for any repair interval in excess of fifteen calendar days).
- v. Inspector's name and signature.

e) Reporting Requirements

- (1) The permittee shall report any leaks in vapor or liquid lines that are not repaired within fifteen days after identification to the CDAQ within thirty days after the repair is completed.
- (2) The permittee shall report any exceedances of annual petroleum solvent consumption greater than four thousand seven hundred gallons to the CDAQ within thirty days of becoming aware of the occurrence.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
VOC emissions shall not exceed 0.49 lb/hr.

Applicable Compliance Method:

Compliance shall be determined by multiplying the actual hourly amount (in gallons) of petroleum solvent consumption by the VOC content of petroleum solvent (6.4 lbs/gal).

- b. Emission Limitation:
VOC emissions shall not exceed 2.16 tons/yr.

Applicable Compliance Method:

Compliance shall be determined by multiplying the actual amount (in gallons) of petroleum solvent consumption by the VOC content of petroleum solvent (6.4 lbs/gal) and divide by 2,000 lbs/ton.

- (2) The permittee shall perform an initial test in accordance with §60.624 of 40 CFR Part 60 Subpart JJJ to verify that the flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle is not greater than 0.05 liters per minute. This test shall be conducted for a duration of no less than 2 weeks during which no less than 50 percent of the dryer loads shall be monitored for their final recovered solvent flow rate. The suggested point for measuring the flow rate of recovered solvent is the outlet of the solvent-water separator. Near the end of the recovery cycle, the entire flow of recovered solvent should be diverted to a graduated cylinder. As the recovered solvent collects in the graduated cylinder, the elapsed time is monitored and recorded in periods of greater than or equal to 1 minute. At the same time, the volume of solvent in the graduated cylinder is monitored and recorded to determine the volume of recovered solvent that is collected during each time period. The recovered solvent flow rate is calculated by dividing the volume of solvent collected per period by the length of time elapsed during the period and converting the result with appropriate factors into units of liters per minute. The recovery cycle and the monitoring procedure should continue until the flow rate of solvent is less than or equal to 0.05 liter per minute. The type of articles cleaned and the total length of the cycle should then be recorded.
- g) Miscellaneous Requirements
- (1) None.