



State of Ohio Environmental Protection Agency

**RE: FINAL GENERAL PERMIT TO INSTALL
ADMINISTRATIVE MODIFICATION**

CERTIFIED MAIL

Street Address:

Mailing Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center
P.O. Box 1049

**MONTGOMERY COUNTY
Application No: 08-04798**

DATE: 11/15/2007

Phillips Dry Cleaning
C. V. Mitchell
1872 N. Gettysburg Ave.
Dayton, OH 45427

Enclosed Please find an Ohio EPA Permit To Install referenced above.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

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

CC: USEPA

RAPCA



**Permit To Install
Terms and
Conditions**

**Issue Date: 11/15/2007
Effective Date: 11/15/2007**

FINAL GENERAL PERMIT TO INSTALL 08-04798 ADMINISTRATIVE MODIFICATION

Application Number: 08-04798
Facility ID: 0857041514
Permit Fee: **\$0**
Name of Facility: Phillips Dry Cleaning
Person to Contact: C. V. Mitchell
Address: 1872 N. Gettysburg Ave.
Dayton, OH 45427

Location of proposed air contaminant source(s) [emissions unit(s)]:
1872 N. Gettysburg Ave.
Dayton, Ohio

Emissions Unit ID	Permittee Description	Applicable General Permit Terms (see attached)	Fee
D002	perchloroethylene dry cleaning machine	General_Permit_15 General_Permit_15 <= 2100 gallons Perchloroethylene dry cleaning per rolling, 12-month period, installed before 12/21/05	\$0

The above named entity is hereby granted a permit to install administrative modification for each emissions unit described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of the identified general permit requirements identified above for each emissions unit 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

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If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times

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substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. Air Pollution Nuisance

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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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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.)

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3. 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.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. 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.

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Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

MGP

Number:MGP01503071016

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

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MGP
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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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 - Dry to Dry perchloroethylene (PCE) dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A)(3)	Perchloroethylene usage at this facility shall not exceed 2100 gallons per rolling, 12-month period. Emissions of perchloroethylene from this facility shall not exceed 9.36 tons per rolling, 12-month period. The requirements of this rule also include compliance with OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subparts A & M.
OAC rule 3745-21-09(AA)	See terms A.I.2.b and A.II. 1-4.
40 CFR Part 63, Subparts A & M	See terms A.I.2.a, A.I.2.c and A.II. 5-10.

2. Additional Terms and Conditions

- 2.a The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser.
- 2.b The dryer is equipped with or vented to a refrigerated vapor condenser whereby there is no exhaust of perchloroethylene vapors to the ambient air throughout the

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drying cycle, except for when the dryer's door is momentarily opened during loading or unloading.

- 2.c** The permittee must comply with all of the requirements listed for an area source per 40 CFR Part 63, Subpart M.

II. Operational Restrictions

1. The waste from any diatomaceous earth filter which has been used to filter perchloroethylene shall contain no more than twenty-five per cent (25%) by weight perchloroethylene, 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 sixty per cent (60%) by weight perchloroethylene, 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 twenty-four (24) 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 permittee shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still.
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 manufacturer's specifications and recommendations.
8. The gas-vapor stream temperature at the outlet of the condenser shall not be greater than 45 degrees Fahrenheit before the end of the cool down cycle while the gas-vapor stream is flowing through the condenser.
9. Perchloroethylene shall not be vented or released to the atmosphere while the dry

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cleaning machine drum is rotating.

10. The machine shall be operated to prevent air drawn into the dry cleaning machine (when the machine door is open) from passing through the refrigerated condenser.

III. Monitoring and/or Record keeping Requirements

1. The following components shall be visually inspected each week for perceptible leaks 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 or muck cookers;
 - h. distillation unit;
 - i. diverter valves;
 - j. saturated lint from the lint basket;
 - k. cartridge filters and housings;
 - l. stills; and
 - m. exhaust dampers.

Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills this requirement.

Leaks are to be repaired within 24 hours after being detected. If repair parts are to be ordered, the order shall be initiated within two (2) working days after detecting the leak. The repair parts shall be installed within five (5) working days after they are received.

2. Beginning no later than July 28, 2008, the components listed in Section A.III.1 shall be inspected monthly for vapor leaks using a halogenated hydrocarbon detector or PCE gas analyzer. The inspections shall be done while the components are in operation. The analyzer shall be operated according to the manufacturer's instructions. Specifically, the operator shall place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface of the periphery. The week in which a monthly inspection is performed using a halogenated hydrocarbon detector or PCE gas analyzer shall satisfy the requirements for the weekly visual inspection for perceptible leaks for that same week as required in Section A.III.1.

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3. The following parameters, as applicable, shall be monitored on a weekly basis:

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- a. The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.
 - b. If the machine is not equipped with refrigeration system pressure gauges, 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, prior to the end of the cool-down or drying cycle, while the gas-vapor stream is flowing through the condenser, adjustments or repairs shall be made to lower the outlet temperature to less than or equal to 45 degrees Fahrenheit. Repair parts shall be ordered within two (2) working days after detecting a violation that needs repair parts. Repair parts shall be installed within five (5) working days after they are received.
4. The following records shall be kept on site in a log for a period of not less than five (5) years, and shall be made available upon request:
- a. Receipts of all perchloroethylene purchases.
 - b. The volume of perchloroethylene purchased each month as recorded from perchloroethylene purchase receipts. If no perchloroethylene is purchased during a given month, then the records shall state zero gallons.
 - c. The calculation and result of the yearly perchloroethylene consumption (12-month rolling summation) determined on the first day of each month.
 - d. The dates of all weekly visual inspections and monthly vapor leak inspections conducted with the use of a halogenated hydrocarbon detector or PCE gas analyzer 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.

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- f. The date and temperature sensor monitoring results, as required in Section A.III.3 above.
- g. A description of control equipment maintenance performed and the date.

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- h. The amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.
5. 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 on site and shall be made available upon request.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) and the U.S. EPA (Region 5) in writing of any record from Section A.III.4 showing that the perchloroethylene usage limitation of 2100 gallons per rolling, 12-month period specified in Section A.I.1 was exceeded. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) and the U.S. EPA (Region 5) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the mass emission limit listed in Section A.I.1 of 9.36 tons of perchloroethylene per rolling, 12-month period is demonstrated by multiplying the rolling, 12-month consumption of perchloroethylene in gallons (required in Section A.III.4.c) by 0.66 (the percentage of perchloroethylene assumed to be emitted to the atmosphere including vent and fugitive emissions) and by 0.00675 ton/gallon (the specific density of perchloroethylene).
2. Compliance with the annual perchloroethylene consumption limitation shall be determined using the records maintained in accordance with Section A.III.4.

VI. Miscellaneous Requirements

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, Part 63, Subpart M, within 180 days of the exceedance determination.

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B. State Only Enforceable Section

I. 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 - Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period, installed before December 21, 2005.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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ADMINISTRATIVE MODIFICATION
Phillips Dry Cleaning

Source Description: Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period and is equipped with a carbon adsorber

MGP
Number:MGP01603071016

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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 - Dry to Dry perchloroethylene (PCE) dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period and is equipped with a carbon adsorber

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A)(3)	<p>Perchloroethylene usage at this facility shall not exceed 2100 gallons per rolling, 12-month period.</p> <p>Emissions of perchloroethylene from this facility shall not exceed 9.36 tons per rolling, 12-month period.</p> <p>The requirements of this rule also include compliance with OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subparts A & M.</p>
OAC rule 3745-21-09(AA)	See terms A.I.2.b and A.II. 1-4.
40 CFR Part 63, Subparts A & M	See terms A.I.2.a, A.I.2.c and A.II. 5-12.

2. Additional Terms and Conditions

- 2.a The gas-vapor stream contained within the dry cleaning machine must be routed through a refrigerated condenser and the air PCE gas-vapor stream from inside the dry cleaning machine drum must pass through a non-vented carbon adsorber before the door of the dry cleaning machine is opened. The carbon adsorber must be desorbed in accordance with the manufacturer's instructions.

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- 2.b** The dryer is 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.
- 2.c** The permittee must comply with all of the requirements listed for an area source per 40 CFR Part 63, Subpart M.

II. Operational Restrictions

1. The waste from any diatomaceous earth filter which has been used to filter perchloroethylene shall contain no more than twenty-five per cent (25%) by weight perchloroethylene, 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 sixty per cent (60%) by weight perchloroethylene, 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 twenty-four (24) 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 permittee shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still.
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 manufacturer's specifications and recommendations.
8. The gas-vapor stream temperature at the outlet of the condenser shall not be greater

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than 45 degrees Fahrenheit before the end of the cool down cycle while the gas-vapor stream is flowing through the condenser.

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 to prevent air drawn into the dry cleaning machine (when the machine door is open) from passing through the refrigerated condenser.
11. The PCE concentration in the exhaust of the carbon adsorber shall be equal to or less than 100 parts per million (ppm) by volume when measured during the last dry cleaning cycle prior to desorption of that carbon adsorber or removal of the activated carbon.
12. The PCE concentration (measured weekly) in the dry cleaning machine drum shall be equal to or less than 300 ppm by volume at the end of the dry cleaning cycle.

III. Monitoring and/or Record keeping Requirements

1. The following components shall be visually inspected each week for perceptible leaks 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 or muck cookers;
 - h. distillation unit;
 - i. diverter valves;
 - j. saturated lint from the lint basket;
 - k. cartridge filters and housings;
 - l. stills; and
 - m. exhaust dampers.

Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills this requirement.

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Leaks are to be repaired within 24 hours after being detected. If repair parts are to be ordered, the order shall be initiated within two (2) working days after detecting the leak. The repair parts shall be installed within five (5) working days after they are received.

2. The components listed in Section A.III.1 shall also be inspected for vapor leaks monthly using a halogenated hydrocarbon detector or PCE gas analyzer. The inspections shall be done while the components are in operation. The analyzer shall be operated according to the manufacturer's instructions. Specifically, the operator shall place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface of the periphery. The week in which a monthly inspection is performed shall satisfy the requirements for the weekly visual inspection for perceptible leaks for that same week as required in Section A.III.1.
3. The following parameters, as applicable, shall be monitored on a weekly basis:
 - a. The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.
 - b. If the machine is not equipped with refrigeration system pressure gauges, 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, prior to the end of the cool-down or drying cycle, while the gas-vapor stream is flowing through the condenser, adjustments or repairs shall be made to lower the outlet temperature to less than or equal to 45 degrees Fahrenheit. Repair parts shall be ordered within two (2) working days after detecting a violation that needs repair parts. Repair parts shall be installed within five (5) working days after they are received.
4. To determine if the PCE concentration in the carbon adsorber exhaust is less than or equal to 100 ppm by volume, it shall be measured weekly with a colorimetric detector or PCE gas analyzer. The concentration shall be measured while the machine is venting to the carbon adsorber at the end of the last dry cleaning cycle prior to

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desorption of the carbon adsorber or removal of the activated carbon . The following procedures shall be followed:

- a. Use a colorimetric detector or PCE gas analyzer designed to measure a concentration of 100 ppm by volume of PCE in air to an accuracy of ± 25 ppm by volume.
- b. Use the colorimetric detector or PCE gas analyzer according to the manufacturer's instructions.
- c. Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet.

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5. To determine if the PCE concentration in the dry cleaning machine drum at the end of the dry cleaning cycle is less than or equal to 300 ppm by volume, it shall be measured weekly with a colorimetric detector tube or PCE gas analyzer. The concentration shall be measured at the end of the dry cleaning cycle using the following procedures:
 - a. Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 300 ppm by volume of PCE in the air to an accuracy of ± 75 ppm by volume.
 - b. Use the colorimetric detector or PCE gas analyzer according to the manufacturer's instructions.
 - c. Conduct the weekly monitoring by inserting the colorimetric detector or PCE gas analyzer tube into the open space above the articles at the rear of the dry cleaning machine drum immediately upon opening the dry cleaning machine door.

6. The following records shall be kept on site for a period of not less than five (5) years, and shall be made available upon request:
 - a. Receipts of all perchloroethylene purchases.
 - b. The volume of perchloroethylene purchased each month as recorded from perchloroethylene purchases. If no perchloroethylene is purchased during a given month, then the entry into the log shall be zero gallons.
 - c. The calculation and result of the yearly perchloroethylene consumption (12-month rolling summation) determined on the first day of each month.
 - d. The dates of all weekly visual inspections and monthly vapor leak inspections conducted with the use of a halogenated hydrocarbon detector or PCE gas analyzer and the name or location of dry cleaning system components where leaks are detected.
 - e. The dates of repair and records of written or verbal orders for repair parts.
 - f. The date and temperature sensor monitoring results, as required in Section

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A.III.3 above.

- g. The date and monitoring results, as required in Sections A.III.4 and 5 above.
 - h. A description of control equipment maintenance performed and the date.
 - i. The amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.
7. 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 on site and shall be made available upon request.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) and the U.S. EPA (Region 5) in writing of any record from Section A.III.6.c showing that the perchloroethylene usage limitation of 2100 gallons per rolling, 12-month period specified in section A.I.1 was exceeded. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) and the U.S. EPA (Region 5) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1. Compliance with the mass emission limit listed in Section A.I.1 of 9.36 tons of perchloroethylene per rolling, 12-month period is demonstrated by multiplying the rolling, 12-month consumption of perchloroethylene in gallons (required in Section A.III.6.c) by 0.66 (the percentage of perchloroethylene assumed to be emitted to the atmosphere including vent and fugitive emissions) and by 0.00675 ton/gallon (the specific density of perchloroethylene).
- 2. Compliance with the annual perchloroethylene consumption limitation shall be determined using the records maintained in accordance with Section A.III.6.

VI. Miscellaneous Requirements

- 1. If the total yearly consumption of perchloroethylene exceeds 2100 gallons per year, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR, Part 63, Subpart M, within 180 days of the exceedance

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B. State Only Enforceable Section

I. 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 - Dry to Dry perchloroethylene dry cleaning non-residential facility that uses up to 2100 gallons of perchloroethylene per rolling, 12-month period and is equipped with a carbon adsorber

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

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None.