OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1197
NESHAP

CERTIFIED MAIL

August 2, 1995

BLAIRS CLEANERS
JOHN P. FORADAS
3775 CLEVELAND AVE NW
CANTON, OH 44709

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL

OhioEPA

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-1197
APS Premise No. 1576051311
Permit Fee: $200.00

Name of Facility: BLAIRS CLEANERS

Person to Contact: JOHN P. FORADAS

Address: 3775 CLEVELAND AVE NW
CANTON, OH 44709

Location of proposed source(s): 3775 CLEVELAND AVE NW
CANTON, OHIO

Description of proposed source(s):
DRY TO DRY PERCHLOROETHYLENE DRY CLEANING MACHINE.

Date of Issuance: August 2, 1995

Effective Date: August 2, 1995

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described 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 and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

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 SOURCES(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 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 (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 30 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.

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 filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for BLAIRS CLEANERS located in Stark County. The sources 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
D001	Dry-to-dry perchloro-ethylene dry cleaning machine; Firbimatic 380	Compliance with MACT standards	3745-31-05 3745-21-09 (AA) 40 CFR Part 63; Subpart M	Limit of 500 gallons of perchloroethylene per year for the entire facility

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Perchloroethylene	*3.25

*This limit is for the entire facility not just this new machine.

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 Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

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

1. This facility must comply with the MACT standards for dry cleaners found in 40 CFR, Part 63, Subpart M including all reporting requirements.

2. Control Equipment Requirements

   Any dryer which contains articles cleaned in perchloroethylene is to be equipped with or vented to a refrigerated vapor condenser where 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.

3. Solvent Still Operation

   The waste from any distillation operation (solvent still) which has been used to distill perchloroethylene is to contain no more than 60% by weight VOC as determined under Paragraph (J) of OAC Rule 3745-21-10.

4. Filter Cartridge Requirements

   Any disposable filter cartridge which has been used to filter perchloroethylene is to be drained in the filter housing for at least 24 hours before being discarded. Waste containing perchloroethylene must be stored in tightly sealed containers while awaiting disposal.

5. Leaking Equipment Limitations and Monitoring

   A weekly leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious from sight, smell, or touch shall be conducted. 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 two working days after detecting a leak that needs repair parts. Repair parts shall be installed within five working days after they are received.

Compliance with this requirement shall be determined through visual inspection of the following components:

A. hose connections, unions, couplings, and valves;

B. machine door gaskets and seatings;

C. filter head gasket and seating;

D. pumps;

E. solvent tanks and storage containers;

F. water separators;

G. filter sludge recovery;

H. distillation valves;

I. diverter valves;

J. saturated lint from lint basket;

K. cartridge filters and housings;

L. muck cookers;

M. stills; and

N. exhaust dampers.

6. <u>Recordkeeping and Reporting Requirements</u>

This facility shall retain receipts of perchloroethylene purchases and a log of the following information on site for five (5) years:

A. volume of perchloroethylene purchased each month by this facility. If none was purchased during a given month, enter zero gallons in the log;

B. calculation and result of the yearly perchloroethylene (in gallons) purchased to be determined on the first day of each month. This calculation is performed by adding the amount of all the perchloroethylene purchased in each of the previous twelve months. If none was purchased in

any one month, then the calculation is performed by adding the zero gallon amount (which indicates that no purchases were made for that month) to the amount of perchloroethylene purchased each month of the previous twelve months;

C. dates and results of weekly dry cleaning system components, leak inspections and the name of the system component or location of any detected leaks;

D. dates of repair and records of written or verbal orders for repair parts;

E. a record of control equipment maintenance, such as replacement of the carbon in a carbon absorber;

F. the results of all tests of the solvent content of the solvent still waste;

G. the annual amount of fabric dry cleaned with perchloroethylene, in pounds;

H. the operation and maintenance manuals for all dry cleaning equipment in the plant; and

I. the results of all tests conducted to determine compliance with any and all applicable limitations. This includes such tests as weekly control device monitoring (i.e. RC inlet and outlet temperatures or CA exhaust concentration).

These records shall be made available to the Director or any authorized representative of the Director for review during normal business hours. This facility shall submit annual reports summarizing the above records to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702. These reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

7. <u>Reporting and Compliance Requirements</u>

This facility must comply with the applicable requirements upon start-up and submit a compliance report within thirty (30) days of new facility construction or new dry cleaning machine installation. A Compliance report shall be submitted to the USEPA. The report should be directed to:

Dry Cleaner NESHAP Compliance Reports
George Czerniak, Chief of Air Enforcement Branch
USEPA, Region V, AE-17J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Phone: 312-886-7017
Fax: 312-353-8289

A copy of the compliance report required above shall be submitted to each of the following Agencies within thirty (30) days of a new facility construction or new dry cleaning machine installation:

Safaa El-Oraby
Ohio EPA, DAPC-AQM&P
PO Box 1049
Columbus, OH 43216-1049
Phone: 614-644-3697
Fax: 614-644-3681

The City of Canton Health Department
Air Pollution COntrol Division
420 Market Avenue North
Canton, Ohio 44702-1544
Phone: 216-489-3385
Fax: 216-489-3335

If this facility does not have a compliance report form, the form may be obtained from any of the three Agencies listed above.

8. Control Equipment Monitoring Requirement

This facility shall perform weekly monitoring tests to show that the temperature at the end of the drying cycle on the outlet side of the refrigerated condenser is less than or equal to 45 degrees Fahrenheit to an accuracy of (+) or (-) 2 degrees Fahrenheit.

9. Perc Usage Limitation

This source shall not use more than 500 gallons of perchloroethylene in any year. This source consists of two machines.