



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LUCAS COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 04-01262

DATE: 5/15/2001

Dry Cleaning Operations
Joseph Perlaky
3401 Woodville Rd Ste K
Northwood, OH 43619

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 Review Appeals Commission 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 within thirty (30) days after the notice of the Directors 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

TDES



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 04-01262

Application Number: 04-01262
APS Premise Number: 0448020078
Permit Fee: **\$200**
Name of Facility: Dry Cleaning Operations
Person to Contact: Joseph Perlaky
Address: 3401 Woodville Rd Ste K
Northwood, OH 43619

Location of proposed air contaminant source(s) [emissions unit(s)]:

3401 Woodville Rd
Northwood, Ohio

Description of proposed emissions unit(s):

dry-to-dry cleaning machine.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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



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 the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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

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 this Permit To Install.

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 of 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, the State, and citizens 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 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 To Install 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 thirty (30) 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.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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.)

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.

4. Air Pollution Nuisance

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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 cannot meet the requirements of this permit or cannot meet applicable standards.

7. 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.

8. 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).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

10. 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., 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.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
perchloroethylene	32.5

Dry Cleaning Operations
PTI Application: **04-01262**
Issued: 5/15/2001

Facility ID: **0448020078**

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

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
D002 - three new dry-to-dry cleaning machines with refrigerated condensers and carbon absorbers	OAC rule 3745-31-05(D) (PTI 04-1135) 40 CFR Part 63, Subparts A and M OAC rule 3745-21-09(AA)	See A.I.2.a and A.I.2.b below. See A.I.2.c, A.I.2.d, and A.I.2.e below. See A.I.2.f below.

2. Additional Terms and Conditions

- 2.a The permittee shall consume no more than 7,268 gallons of perchloroethylene per rolling, 12-month period for both emission units D001 and D002.
- 2.b Perchloroethylene emissions shall not exceed 32.5 tons per rolling, 12-month period for both emission units D001 and D002.
- 2.c The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser or an equivalent control device.
- 2.d The exhaust from each dry cleaning machine shall be vented through a carbon absorber immediately before or as the door of the dry cleaning machine is opened.
- 2.e The perchloroethylene concentration in the exhaust from the carbon absorber shall be equal to or less than 100 ppmv (parts per million by volume).
- 2.f Each dryer shall be equipped with or vented to a refrigerated vapor condenser whereby

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Issued: 5/15/2001

Emissions Unit ID: **D002**

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.

II. Operational Restrictions

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 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.
6. The door of each dry cleaning machine shall be closed at all times except to transfer articles to and from the machine.
7. Each dry cleaning machine shall be operated and maintained according to the manufacturer's specifications and recommendations.
8. The outlet gas-vapor stream temperature of each condenser shall be a maximum of 45 degrees Fahrenheit.
9. Perchloroethylene shall not be vented or released to the atmosphere while each dry cleaning machine drum is rotating.
10. Each dry cleaning machine shall be operated with a diverter valve, if equipped, to prevent air drawn into the dry cleaning machine (when the machine door is open) from passing through the refrigerated condenser.
11. Each carbon absorber shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time.

III. Monitoring and/or 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 each dry cleaning system is operating:
 - a. hose and pipe connection, fittings, coupling and valves;
 - b. machine door gaskets and seatings;
 - c. filter gaskets and seatings;
 - d. pumps;
 - e. solvent tanks and containers;
 - f. water separators;
 - g. filter sludge recovery;
 - h. distillation valves;
 - i. diverter valves;
 - j. saturated lint from the lint basket;
 - k. cartridge filters and housings;
 - l. muck cookers;
 - m. stills; and
 - n. exhaust dampers.
2. The temperature of the air-perchloroethylene gas-vapor stream on the outlet side of each 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

3. The concentration of perchloroethylene in the gas-vapor stream at the outlet of each carbon absorber shall be measured weekly with a colorimetric detector tube while the machine is venting to that carbon absorber at the end of the last dry cleaning cycle prior to desorption of that carbon absorber. The colorimetric detector tube must measure perchloroethylene at a concentration of 100 ppmv in air to an accuracy of plus or minus 25 ppmv. The colorimetric detector tube shall be used according to the manufacturer's instructions. The sampling port shall be easily accessible and shall be at least 8 stack diameters downstream and 2 stack diameters upstream from any flow disturbance, such as a bend or other fitting.
4. If any monitored concentration exceeds its allowable parameters, repairs or adjustments must be made to meet those values. Repair parts shall be 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.
5. The permittee shall maintain a log of the following records:
 - a. receipts of all perchloroethylene purchases;
 - b. the volume of perchloroethylene purchases each month as recorded from perchloroethylene purchases (if no perchloroethylene is purchased during a given month, then the entry in 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 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;
 - f. the results and dates of all equipment monitoring required by this permit;
 - g. control equipment maintenance;
 - h. the amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds; and

Emissions Unit ID: **D002**

- i. the results of all tests conducted to determine compliance with the VOC content limitations for the waste from a diatomaceous earth filter and the waste from a solvent still.
6. A copy of the design specifications and the operation manuals for each dry cleaning system and each emission control device located at the dry cleaning facility shall be retained on site and 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.5.c showing that the perchloroethylene usage limitation specified in section A.I.2.a 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.

2. The permittee shall submit deviation (excursion) reports which include the following information:

- a. an identification of each emission test for a carbon absorber that exceeded the 100 ppmv limitation;
- b. an identification of each temperature measurement for a condenser that exceeded 45 degrees Fahrenheit; and
- c. an identification of each rolling, 12-month period that exceeded the 7,268 gallons limitation.

The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

3. The permittee shall submit annual reports which contain the following information for the preceding calendar year:

- a. a summary of the results of all tests conducted to determine compliance with the limitations applicable to each refrigerated condenser (i.e., the temperature of the exhaust gases from each condenser), each carbon absorber (i.e., the concentration of perchloroethylene in the exhaust gases from each carbon absorber), and the wastes from the diatomaceous earth filter and distillation operation (solvent still);
- b. the annual usage of perchloroethylene, in gallons; and
- c. the annual perchloroethylene emissions, in tons.

The annual reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be

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Issued: 5/15/2001

Emissions Unit ID: **D002**

determined in accordance with the following methods:

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Issued: 5/15/2001

Emissions Unit ID: **D002**

Emission Limitation:

32.5 tpy of perchloroethylene emissions per rolling, 12-month period

Applicable Compliance Method:

Compliance with the mass emission limit listed in section A.I.2.a of 32.5 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.5.c) times the percentage (0.66) of perchloroethylene assumed to be emitted to the atmosphere (including vent and fugitive emissions) times the specific density of perchloroethylene (0.00675 ton/gallon). The perchloroethylene emission factor was obtained from the Background Information Document for 40 CFR Part 63, Subpart M.

Emission Limitation:

7,268 gallons of perchloroethylene per rolling, 12-month period for both units D001 and D002

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5.c.

VI. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
D002 - New dry-to-dry cleaning machine	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Dry Cleaning Operations
 PTI Application: **04-01262**
Issued: 5/15/2001

Facility ID: **0448020078**

SIC CODE 7216 SCC CODE 4-01-001-01 EMISSIONS UNIT ID D002

EMISSIONS UNIT DESCRIPTION New dry-to-dry cleaning machine

DATE INSTALLED October 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	n/a	13.4	n/a	32.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? _____ NESHAP? **Subparts A and M** PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT is the use of refrigerated condensers on emission units

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

Dry Cleaning Operations
 PTI Application: **04-01262**
Issued: 5/15/2001

Facility ID: **0448020078**

Ohio EPA Permit to Install Information Form

Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
 Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

Dry Cleaning Operations
 0448020078
 PTI 04-01262

Dry Cleaning Operations is a Title V facility with the existing permit covering four dry-to-dry cleaning units, D001.

This PTI is for three new dry-to-dry cleaning machines (D002) that are being installed at the facility. Multimatic is a new 160 lbs machine that was installed in December 2000, Fluormatic is a new 35 lbs machine that will be installed in April 2001, and Hoffman is a 55 lbs machine installed in October 2000 to replace one of the old machines. Since the maximum annual solvent usage for the whole facility and the operating schedule will not change, the combined allowable emission rate for both D001 and D002 will remain at 32.5 tons of perchloroethylene per year.

Dry Cleaning Operations
 PTI Application: **04-01262**
Issued: 5/15/2001

Facility ID: **0448020078**

B.A.T. Determination:

The three machines are dry-to-dry cleaning units with refrigerated condensers and supplemental adsorbers. Dry Cleaning Operations must comply with the following:

OAC Rule 3745-21-09(AA)
 40 CFR Part 63 Subparts A, M
 OAC Rule 3745-31-05(D)

Permit Allowable Emission Rate:

Short term permit allowable emission limitations are inappropriate for this type of source; only equipment specifications apply. Use NESHAP and OAC Rule 3745-21-09(AA) for requirements along with annual PERC numbers. The emission factor of 66% for dry-to-dry machines was obtained from an IOC dated 8/18/97 from Stacey Coburn.

$PTE = 7268 \text{ gal Perc/yr} * 13.55 \text{ lb Perc/gal} * 0.66 * 1 \text{ ton}/2000 \text{ lb} = 32.5 \text{ tons of PERC /yr}$

Permit Allowable Emissions:

There are no permit allowable emissions for this type of source, only equipment and operation specifications.

Actual Emissions:

The company uses approximately 3000 gallons of perchloroethylene per year.

$Actual = 3000 \text{ gal Perc/yr} * 13.55 \text{ lb Perc/gal} * 0.66 * 1 \text{ ton}/2000 \text{ lb} = 13.4 \text{ ton PERC/yr}$

Other Applicable Regulations:

CEM, NSPS, Offsets, PSD not applicable.

Please complete:

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
perchloroethylene	32.5