

Facility ID: 0448011504 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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**Part II - Specific Facility Terms and Conditions**

**a State and Federally Enforceable Section**

1. None

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**b State Only Enforceable Section**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0448011504 Emissions Unit ID: D002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Two new dry-to-dry machines with refrigerated condensers and supplemental carbon adsorbers	40 CFR Part 63, Subparts A and M	See section A.I.2.a.
	OAC rule 3745-21-09(AA)	See section A.I.2.b.
	OAC rule 3745-31-05(A)(3) (PTI 04-1079 as issued April 15, 1998 and modified April 25, 2002)	See sections A.I.2.c and A.I.2.d.
	OAC rule 3745-31-05(D)	See section A.I.2.e.

2. Additional Terms and Conditions

- a. The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser or an equivalent control device.
- (a) The exhaust from each dry cleaning machine shall be vented through a carbon adsorber immediately before or as the door of the dry cleaning machine is opened.  
The concentration of perchloroethylene in the exhaust from the carbon adsorber shall be equal to or less than 100 parts per million by volume (ppmv).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 63, Subparts A and M.  
Compliance with OAC rule 3745-21-09(AA) for sources affected by Subpart M may be demonstrated by maintaining compliance with the operational restrictions, monitoring, record keeping, and reporting requirements of Subpart M.
- c. The yearly perchloroethylene solvent consumption limit based on the yearly solvent consumption and calculated according to 40 CFR 63.323(d) is 2000 gallons of perchloroethylene per rolling, 12-month period.
- d. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subparts A and M, OAC rule 3745-21-09(AA), and OAC rule 3745-31-05(D).
- e. The perchloroethylene emissions from this emissions unit shall not exceed 8.9 tons as a rolling, 12-month summation.

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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 manufacturer's specifications and recommendations.
8. The outlet gas-vapor stream temperature of the condenser shall be not more than 45 degrees Fahrenheit.
9. Perchloroethylene shall not be vented or released to the atmosphere while the dry cleaning machine drum is rotating.
10. Each dry cleaning machine shall be operated with a diverter valve to prevent air drawn into the dry cleaning machine (when the machine door is open) from passing through the refrigerated condenser.
11. Each carbon adsorber shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time.
12. Any exhaust from the dryer shall be vented through a carbon adsorber which emits no more than 100 ppmv of perchloroethylene at any time.

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### III. **Monitoring and/or Record Keeping Requirements**

1. A leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious from sight, smell, or touch shall be conducted. Pursuant to OAC rule 3745-21-09(AA)(1)(e), any equipment found to be leaking perchloroethylene liquid or vapor is not to be operated until the leak is repaired. Leaks are to be repaired within 24 hours after being found, or repair parts ordered within 2 working days after detecting a leak that needs repair parts. Repair parts shall be installed within 5 working days after they are received. In accordance with 40 CFR Part 63 Subpart M, compliance with this requirement shall be determined through weekly visual inspection of the following components while the dry cleaning system is operating:
  - a. hose and pipe connections, fittings, coupling and valves;
  - b. machine door gaskets and seatings;
  - c. filter gaskets and seatings;
  - d. pumps;
  - e. solvent tanks and containers;
  - f. water separators;
  - g. filter sludge recovery;
  - h. distillation valves;
  - 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 the refrigerated condenser shall be measured weekly with a temperature sensor. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 45 degrees Fahrenheit to an accuracy of plus or minus 2 degrees Fahrenheit. If the outlet temperature is higher than 45 degrees Fahrenheit, adjustments or repairs shall be made to meet that value. Repair parts shall be ordered within 2 working days after detecting a violation that needs repair parts. Repair parts shall be installed within 5 working days after they are received.
3. The concentration of perchloroethylene in the gas-vapor stream at the outlet of the carbon adsorber shall be measured weekly with a colorimetric detector tube while the machine is venting to that carbon adsorber at the end of the last dry cleaning cycle prior to desorption of that carbon adsorber. The colorimetric detection 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 parameter, 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 following records shall be kept on site in a log for a period of not less than 5 years, and shall be made available upon request:
  - a. receipts of all perchloroethylene purchases;
  - b. the volume of perchloroethylene purchased each month as recorded from perchloroethylene purchases

(if no perchloroethylene is purchased during a given month, then the entry in 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; and
  - f. the results and dates of all equipment monitoring required by this permit.
6. The following records shall be kept for a period of not less than 3 years:
- a. control equipment maintenance; and
  - b. the amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.
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 be made available upon request.

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**IV. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services (TDOES) 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.c was exceeded. The notification shall include a copy of such record and shall be sent to the TDOES and the U.S. EPA (Region 5) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports that contain the following information:
  - a. a summary of the results of any tests conducted to determine compliance with the limitations applicable to the refrigerated condenser, the carbon adsorber, the waste from a diatomaceous earth filter, and the waste from a distillation operation (solvent still); and
  - b. the usage of perchloroethylene, in gallons, for each rolling, 12-month period during the calendar year.The annual reports shall be submitted by April 15 of each year.

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**V. Testing Requirements**

1. Compliance with the total yearly consumption and the emission limitation in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

2000 gallons of perchloroethylene per year as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5.c for perchloroethylene purchased.
  - b. Emission Limitation:

8.9 tons of perchloroethylene as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the total perchloroethylene purchased in gallons from section A.III.5.c by the emission factor of 66% and the specific density of perchloroethylene (0.00675 ton/gal) to obtain the total perchloroethylene used in tons per year. The perchloroethylene emission factor was obtained from the Background Information Document for 40 CFR Part 63, Subpart M.

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**VI. Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
<b>2. Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None