Facility ID: 0448011678 Issuance type: Final State Permit To Operate

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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 II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

   (a) None.

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

   (a) None.

A. **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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Industrial Stoddard dry cleaning operation with 10 solvent-recovery dryers	OAC rule 3745-31-05 (PTI 04-1025)	4.5 lbs VOC/100 pounds cleaned (dry weight) 90 TPY of VOC See A.2.a and B.1, below.
	40 CFR Part 60, Subpart JJJ	See A.2.b - A.2.d, below.
	OAC rule 3745-21-09(BB)	Equal to or less stringent than the above limitations.

2. **Additional Terms and Conditions**

   (a) The vacuum pump discharge shall be utilize a submerged fill pipe when discharging solvent to the system feed tank. There shall be no visible emissions, as bubbles, from the vacuum pump submerged discharge.
   The recovered solvent flow rate from the solvent-recovery dryer at the termination of the recovery cycle shall be no greater than 0.05 liters/minute.
   Each solvent dry cleaning dryer shall be of a solvent-recovery design.
   Each dry cleaning solvent filter shall be of a cartridge or approved, equivalent hermetically sealed shaker screen design.

B. **Operational Restrictions**

1. This facility shall be limited to four million pounds of materials dry cleaned (dry weight) per rolling, 12-month period.

2. The permittee shall operate and maintain the dry cleaning system according to the manufacturers' specifications and recommendations.

3. Any disposable filter cartridge which has been used to filter dry cleaning solvent is to be drained in the filter housing or other sealed container, for a minimum of 8 hours, or shall be treated in an equivalent manner, before removal from the dry cleaning facility.

4. The permittee shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times.

5. Any bucket or barrel containing petroleum cleaning solvent or petroleum solvent-laden waste shall be covered to minimize solvent evaporation.

6. The permittee shall repair within 15 days all perceptible leaks detected pursuant to section C.1. If repair parts must be ordered, either written or verbal order for those parts shall be initiated within 3 working days of detecting such a leak. Such repair parts shall be installed within 15 working days after receipt.

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

1. A weekly leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious to sight, smell, or touch shall be conducted while the equipment is operating. Compliance with this requirement shall be determined through inspection of the following components:
   a. hose connections, unions, couplings and valves;
   b. door gaskets and seatings;
   c. shaker screen housing, gasket and seating;
   d. pumps;
   e. solvent tanks and storage containers;
   f. water separators;

g. distillation unit; and
h. the vacuum pump submerged discharge.

2. The permittee shall retain for 7 years, on site, a logbook containing the following information:

a. the dry weight of materials dry cleaned each day;

b. the rolling, 12-month total dry weight of materials dry cleaned, to be determined on the first day of each month by summing the daily dry weights of materials dry cleaned in each of the previous 12 months;

c. the dates and results of the weekly dry cleaning system leak inspections and the name and location of each system component with detected leaks;

d. the dates of repairs and records of written or verbal orders for repair parts; and

e. the results of all performance tests of the flow rate of recovered solvent from the solvent-recovery dryer required in section E.1 of these terms and conditions.

These records shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

3. The permitee shall retain, on site, 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. These publications shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each exceedance of the operational restriction in section B.1 of four million pounds of material dry cleaned (dry weight) per rolling, 12-month period.

2. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency summarizing the records required by sections C.2.a - C.2.d. These reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

E. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The test method shall determine the flow rate of recovered solvent from the solvent-recovery dryer at the termination of the recovery cycle. This test shall be conducted for a duration of no less than 2 weeks during which no less than 50 percent of the dryer loads shall be monitored for their final recovered solvent flow rate. The suggested point for measuring the flow rate of recovered solvent is from the outlet of the solvent-water separator. Near the end of the recovery cycle, the entire flow of recovered solvent should be diverted to a graduated cylinder. As the recovered solvent collects in the graduated cylinder, the elapsed time is monitored and recorded in periods of greater than or equal to 1 minute. At the same time, the volume of solvent in the graduated cylinder is monitored and recorded to determine the volume of recovered solvent that is collected during each time period. The recovered solvent flow rate is calculated by dividing the volume of solvent collected per period of time by the total elapsed time during each period and converting the result with appropriate factors into units of liters per minute. The recovery cycle and the monitoring procedure should continue until the flow rate of solvent is less than or equal to 0.05 liter per minute. The type of articles cleaned and the total length of the cycle should then be recorded.

c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test (s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

5. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation -
4.5 lbs VOC/100 lbs dry cleaned, by dry weight

Applicable Compliance Method -
Compliance shall be calculated using an emission factor of 4.5 lbs VOC/100 lbs cleaned (dry weight) based on AP-42 (1/95 Edition) emission factors for well-controlled petroleum solvent dry cleaning operations and OAC rule 3745-21-09(BB).
Emission Limitation -
90 TPY of VOC

Applicable Compliance Method -

Compliance with the emission limitation shall be based on compliance with the operational restriction of four million pounds per year of materials dry cleaned (dry weight). If required, annual emissions may be calculated in accordance with section E.5.a.

F. **Miscellaneous Requirements**

1. The permittee shall affix to each petroleum dry cleaning dryer a clearly visible label which states:

"To protect against fire hazards, loss of valuable solvents, and emissions of solvent to the atmosphere, periodic inspection of this equipment for evidence of leaks and prompt repair of any leaks is recommended. The U.S. Environmental Protection Agency recommends that the equipment be inspected every 15 days and all vapor or liquid leaks be repaired within the subsequent 15-day period."