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Facility Name: **Model Cleaners, Inc**

Application Number: **03-0786**

Date: **May 20, 1998**

**GENERAL PERMIT CONDITIONS**

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 SOURCE(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 Ohio 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

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(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 15 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.

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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 made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Model Cleaners, Inc** located in **Erie** County. The emissions units 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
D001	1. New dry-to-dry cleaning machine with refrigerated vapor condenser.	Compliance with Ohio EPA's Air Toxics Policy, with the terms and conditions of this permit and with the US EPA MACT standard	3745-31-05	(9.5 TPY) {refer to Additional Special Terms and Conditions}
	2. New dry-to-dry cleaning machine with refrigerated vapor condenser.		40 CFR Part 63, Subparts A and M	2100 gallons perchloro-ethylene/rolling 12-month period
			3745-21-10 (J)	*
			3745-21-09 (AA)	**

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\* This applicable rule does not establish any emission limitations for this facility.

\*\* There are no emission limitations established under this applicable rule. Refer to the Additional Special Terms and Conditions of this permit for the applicable operational restrictions and recordkeeping requirements established under this rule.

#### SUMMARY

##### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Perchloroethylene	9.5

#### 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.

#### ADDITIONAL SPECIAL TERMS AND CONDITIONS

##### INTRODUCTION

The permittee will install the dry cleaning operation that

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consists of 2 dry-to-dry machines after December 9, 1991 at a facility which employs less than or equal to 2100 gallons of perchloroethylene per year. Therefore, this dry cleaning facility is a new, large area source.

**A. Applicable Emission Limitations and/or Control Requirements**

1. The yearly perchloroethylene solvent consumption limit based on the yearly solvent consumption calculated according to 40 CFR 63.323(d) is 2100 gallons. This equates to 9.5 tons per year.
2. The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser or an equivalent control device.

**B. Operational Restrictions**

1. The permittee shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility.
2. The permittee shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks.
3. The door of each dry cleaning machine shall be closed at all times except to transfer articles to and from the machine.
4. The dry cleaning machine shall be operated and maintained according to manufacturer's specifications and recommendations.
5. The outlet gas-vapor stream temperature of the condenser shall be a maximum of 45 degrees Fahrenheit.
6. Perchloroethylene shall not be vented or released to the atmosphere while the dry cleaning machine is rotating.

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7. The 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.

**C. 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 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;

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1. 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 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 into the log shall be zero gallons;
  - c. the calculation and result of the yearly perchloroethylene consumption (12-month rolling 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,

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- f. the results and dates of all equipment monitoring required by this permit.
4. The following records shall be kept for a period of not less than three 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.
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 onsite and be made available upon request.

**D. Reporting Requirements**

1. If the yearly perchloroethylene solvent consumption limit of 2100 gallons is exceeded by the rolling annual perchloroethylene consumption calculation required by the recordkeeping requirements section of this permit, then the permittee shall submit a signed statement as required by 40 CFR 63.324(c).
2. 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 63, Subpart M, within 180 days of the exceedance determination.
3. If the total yearly consumption of perchloroethylene exceeds 2100 gallons per year, this facility becomes a major source and must comply with the Title V permitting requirements per OAC rule 3745-77.

**E. Testing Requirements**

1. Compliance Methods Requirements

Compliance with the emission limitation(s) established in this permit shall be determined in accordance with

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the following method(s):

Emission Limitation

9.5 tons of perchloroethylene per year

Applicable Compliance Method

As long as the records required by Condition C.3. of these Additional Special Terms and Conditions show that the annual perchloroethylene consumption is less than 2100 gallons per year, compliance with the perchloroethylene limit of 9.5 tons per year will be maintained. The permittee may calculate the actual emission rate by multiplying the annual quantity of perchloroethylene employed by the density of perchloroethylene (13.5 pounds/gallon) and then by 67 percent (as it is assumed that 33 percent is retained in the waste stream).

**F. Miscellaneous Requirements**

1. None.