



State of Ohio Environmental Protection Agency

Street Address:

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Columbus, OH 43215

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-02951**

**DATE:** 2/8/2001

Van Dyne Crotty Co  
Charles Fraley  
30400 Bruce Industrial Parkway  
Solon, OH 44139

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
subpart JJJ	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification, a fee of **\$50** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA

CBAPC



**Permit To Install**

**Issue Date: To be entered upon final issuance**

**Terms and Conditions**

**Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 13-02951**

Application Number: 13-02951

APS Premise Number: 1318537980

Permit Fee: **To be entered upon final issuance**

Name of Facility: Van Dyne Crotty Co

Person to Contact: Charles Fraley

Address: 30400 Bruce Industrial Parkway  
Solon, OH 441393940

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

**30400 Bruce Industrial Parkway  
Solon, Ohio**

Description of proposed emissions unit(s):

**Modification of PTI #13-02951 issued 8/16/1995, to modify mass emissions, annual load limit and total PTI allowable OC emissions.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. 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 Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or Record keeping 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 emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and Record keeping 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. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**6. 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.

**7. 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.

**8. 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.

**9. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

**10. 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.

**11. 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).

**12. 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.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- 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..

**14. 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.

**15. 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.

**B. 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>
OC	90.0

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. 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>
Two Washex washers, eight Hoyt Petro Miser dryers, screens, vacuum stills, and tanks.	PTI #13-2951	10.35 lbs VOC/100 lbs fabric dry-cleaned. Yearly load limit of 17,140 loads/year. The VOC emissions shall not exceed 90 tons per year.
	40 CFR 60 Subpart JJJ	See A.2a, A.2b, A.2c, & A.2d
	OAC 3745-21-09 (BB) OAC 3745-21-10 (N)	See A.2a, A.2c

**2. Additional Terms and Conditions**

- 2.a The dry cleaning dryer shall be a solvent recovery dryer.
- 2.b Each solvent filter that is installed at a petroleum dry cleaning plant shall be a cartridge filter or an equivalent equipment approved by the U.S. EPA. Cartridge filters shall be drained in their sealed housings for at least 8 hours prior to their removal.
- 2.c The dryer shall be operated in a manner such that the dryer remains closed and the solvent recovery phase continues until final recovered solvent flow rate of 1.7 ounces per minute (0.05 liter per minute) or less is attained.
- 2.d The permittee shall include leak inspection and leak repair cycle information in the operating manual and on a clearly visible label posted on each emissions unit. Such information should state:

“To protect against fire hazards, loss of valuable solvent, 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.”

**B. Operational Restrictions**

1. The emissions unit shall not exceed 17,140 loads per year, and 90 tons of VOC per year, calculated on a quarterly rolling total.
2. The total VOC emissions shall be calculated using the following equations:
  - a. 
$$\text{VOC from dryer (TPY)} = (\text{Density of solvent}) \times (\text{Total gallons of solvent used in the last 365 days})$$
  - b. 
$$\text{VOC from boiler (TPY)} = (\text{VOC emission factor}) \times (\text{Thousand cubic feet (MCF) of natural gas used in the last 12 months})$$
  - c. 
$$\text{Total VOC/HC emissions} = \text{VOC from dryer} + \text{VOC from boiler}$$

Note: Density of solvent = 3.22E-03 ton/gal  
VOC emission factor = 8.24E-06 ton/MCF

3. The number of loads dried shall be entered on a log sheet.
4. A log of all solvent purchased shall be maintained.
5. If the number of loads is greater than 4,500 per quarter for three consecutive quarters, a rolling 365-day total on solvent and gas emissions and number of loads dried shall be monitored so that 17,140 loads/year and/or 90 tons per year are not exceeded.

A weekly log shall be kept on solvent usage which includes tank level reading of the three tanks (New + C + E) to the nearest 1/8 inch taken at the end of each week.

6. A leak detection program shall be maintained.
7. Natural gas consumption and related VOC/HC emissions will be recorded on a quarterly basis.
8. Any bucket or barrel which contains petroleum solvent or petroleum solvent-laden waste shall be covered to minimize solvent evaporation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the Ohio EPA representative upon verbal or written request:
  - a. the results of any measurements to determine compliance with the limitation of 0.05 liter per minute as specified in A.2c.
  - b. the results of any leak checks, including, at a minimum, the following information:
    - i. date of inspection;
    - ii. findings (may indicate no leaks discovered or location, nature, and severity of each leak);
    - iii. leak determination method;
    - iv. corrective action (date each leak repaired and reasons for any repair interval in excess of fifteen calendar days); and,
    - v. inspector's name and signature.
2. A daily log shall be kept of loads dried. The log shall contain at least the following:
  - a. day of month;
  - b. number of loads dried; and,
  - c. signature of the person making the entry.
3. Any equipment associated with the use of petroleum solvent shall be visually inspected at least weekly to identify any liquid leaks of petroleum solvent.
4. Any liquid or vapor leak of petroleum solvent shall be repaired within fifteen (15) days after identifying the source of the leak, unless a necessary repair part is not on hand. If a repair part is not on hand, it shall be ordered within three working days after identifying the source of the leak. The leak shall be repaired within fifteen (15) days following the delivery of the necessary repair part.

#### **D. Reporting Requirements**

1. Any test result that shows an exceedance of the limitation specified in A.1 of these terms and conditions shall be reported within thirty days after the occurrence.
2. Any leaks in vapor or liquid lines that are not repaired within fifteen days after identification shall

be reported to the Director within thirty days after the repair is completed.

3. A quarterly report of the number of loads dried in the last three months (January-March, April-June, July-September, October-December) shall be maintained. The report will be submitted to the local air agency by the 15<sup>th</sup> day following the end of the reporting period (e.g. April 15, July 15, October 15, and January 15).

**E. Testing Requirements**

The permittee shall conduct, or have conducted, a performance test on each dryer in accordance with the following requirements:

- a. the performance test shall be conducted to demonstrate compliance with the limitation for flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle; and,
- b. the following test method(s) shall be employed to demonstrate compliance with the recovered solvent flow rate limitation specified in A.2c: OAC Rule 3745-21-10(N).

**F. Miscellaneous Requirements**

None