



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

RE: **DRAFT PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**

LUCAS COUNTY

Application No: 04-01079

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

DATE: 1/31/2002

Adams Laundry and Cleaners
Leighton Woolf
1601 Adams St.
Toledo, OH 43624

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 \$ 0 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

TDES

Toledo Metro Area Council of Gov.

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STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

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

04-01079

Application Number: **04-01079**

APS Premise Number: **0448011504**

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

Name of Facility: **Adams Laundry and Cleaners**

Person to Contact: **Leighton Woolf**

Address: **1601 Adams St.**

Toledo, OH 43624

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

1601 Adams Street

Toledo, OHIO

Description of modification:

Two Hoffman 2010 dry-to-dry perchloroethylene cleaning machines with refrigerated condensers.

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

Director

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 SOURCES

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 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 (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Adams Laundry and Cleaners** located in **LUCAS** 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 & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
D002	Two new dry-to-dry machines with refrigerated condensers and supplemental carbon adsorbers.	Compliance with OAC rule 3745-21-09 (AA) and 40 CFR Part 63 Subpart — “National perchloroethylene Air Emission Standards for Dry Cleaning Facilities”.	NESHAPS (40 CFR Part 63, Subparts A and M) 3745-21-09 (AA)	See additional Special Term and Condition A.1. See additional Special Term and Condition A.2.
			3745-31-05	8.9 tons per year perchloroethylene, see additional special term and condition A.3.

**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Perchloroethylene	8.9

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605.**

Adams Laundry and Cleaners

PTI Application: 04-01079

Modification Issued: To be entered upon final issuance

Facility ID: **0448011504**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Additional Terms and Conditions

1. NESHAPS Requirements

- a. The exhaust from each dry cleaning machine shall be vented through a refrigerated condenser or an equivalent control device.
- b. The exhaust from each dry cleaning machine shall be vented through a carbon adsorber as the door of the dry cleaning machine is opened.
- c. The perchloroethylene concentration in the exhaust from carbon adsorber shall be equal to or less

than 100 ppmv (parts per million by volume).

2. The dryer shall be equipped with or vented to a refrigerated vapor condenser whereby there is no exhaust of perchloroethylene vapors to the ambient air throughout they drying cycle, except for when the dryer's door is momentarily opened during loading or unloading.
3. The yearly perchloroethylene solvent consumption limit based on the yearly solvent consumption calculated according to 40 CFR 63.323 (d) is 2,000 gallons.

B. 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 owner or operator 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. The 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 a maximum of 45 degrees Fahrenheit.
9. Perchloroethylene shall not be vented or released to the atmosphere while the dry cleaning machine drum is rotating.
10. 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.
11. Each carbon adsorber shall not be bypassed to vent or release any air-perchloroethylene gas-vapor

stream to the atmosphere at any time.

C. Monitoring and/or Recordkeeping Requirements

1. A leaks 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. Much cookers;
 - m. Stills; and,
 - n. Exhaust dampers.
2. The temperature of the air-perchloroethylene gas-vapor 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 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 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 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.
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 onsite and be made available upon request.

D. Reporting Requirements

1. The permittee shall submit annual reports which contain the following information:
 - a. A summary of the results of all tests conducted to determine compliance with the limitations applicable to the emissions from a refrigerated condenser, a carbon adsorber, the waste from a diatomaceous earth filter, and the waste from a distillation operation (solvent still); and,
 - b. The annual usage of perchloroethylene, in gallons.

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

E. Testing Requirements

1. Compliance with the emissions limitations of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
8.9 TPY of perchloroethylene emissions

Applicable Compliance Method

Multiply the total perchloroethylene in gallons purchased by the emission factor of 66 percent and the specific density of perchloroethylene (0.00675 ton/gallon) 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.

- b. Emission Limitation
2000 gallons of perchloroethylene per year as a rolling, 12-month summation

Applicable Compliance Method

Compliance shall be determined by the recordkeeping requirements for perchloroethylene purchased and the calculation explained in Section B.5.c. The perchloroethylene emission factor was obtained from the Background Information Document for 40 CFR Part 63, Subpart M.