



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## Title V Operating Permit

Permit No.: 91-97-TV(R1)

Plant ID: 0989

Effective Date: 1/22/2012

Expiration Date: 1/31/2017

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Sam Meyers, Inc.  
3400 Bashford Avenue Court  
Louisville, KY 40218

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Application No. 27954

Application Received: 7/16/2004  
2/16/2010

Permit Writer: Diana Prentice

  
Air Pollution Control Officer  
December 22, 2011

Administratively Complete: 9/16/2004

Date of Public Notice: 11/6/2011

Date of Proposed Permit: 11/6/2011

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**Title V Permit Revisions/Changes**

<b>Revision No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Attachment No./ Page No.</b>	<b>Description</b>
N/A	01/15/2000	11/21/1999	Initial	Entire Permit	Initial Permit Issuance
R1	12/22/2011	11/06/2011	Renewal	Entire Permit	5 year renewal, incorporating construction permits # 02-06-C, 162-09-C, and removal of Emission Unit U1*

\*Note: The source has permanently disabled the equipment previously permitted as Emission Unit U1 per a letter to the District dated November 1, 2011. Therefore, U1 has been removed from the permit.

**ABBREVIATIONS AND ACRONYMS**

AC	- Additional Condition
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Available Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industrial Classification System
NSR	- New Source Review
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO	- Sulfur dioxide <sub>2</sub>
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound

### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.22, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 2.02, Section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

Insignificant activities identified in District Regulation 2.02, Section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

### **General Conditions**

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, Sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, Sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, Section 4.3.5.4:

*US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960*

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, Section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.

4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, Section 3.4.
  
5. **Emergency Provision**
  - a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
    - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
    - ii. The permitted facility was at the time being properly operated.
    - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
    - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
  - b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
  - c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, Sections 4.7.1 through 4.7.4)
  
6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5percent per month up to a maximum of 25percent of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, Section 1.3)
  
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
  
8. **Enforceability Requirements** - Except for the conditions that are specifically, "District Only Enforceable Conditions", all terms and conditions of this permit, including any

provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, Sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, Sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, Section 4.1.13.6)

If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, Section 10.2)

12. **Insignificant Activities** - The owner or operator shall:

- a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, Section 5)
- b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. (Regulation 2.16, Section 4.3.5.3.6)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.

- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, Section 4.3.2)

14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, Section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. All semi-annual compliance reports shall include the following certification statement per Regulation 2.16.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of company responsible official.

If a change in the “Responsible Official” (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form 9400-A and Form AP-0208) to the District within 30 calendar days following the date a change in the, RO occurs for this facility.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through June 30 <sup>th</sup>	August 29 <sup>th</sup>
July 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

- 15. **Off-permit Documents**- Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, Section 4.1.5)
- 16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, Section 5.8.
- 17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, Sections 2.3 and 5.4.

18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, Sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, Section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, Sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, Section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, Section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, Section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, Section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
  - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, Section 4.2; or
  - e. Noncompliance with KRS Chapter 77.

25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, Section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, Section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, Sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, Section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
  - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Louisville Metro Air Pollution Control District  
850 Barret Ave  
Louisville, KY 40204-1745*
  - b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV  
APTMD - 12th floor*

*Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

<b>Regulation</b>	<b>Title</b>
1.01	General Provisions
1.02	Definitions
1.03	Abbreviations And Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Shutdowns, Malfunctions, Startups, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Minor Facility Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources

Regulation	Title
7.01	General Provisions (New Affected Facilities)

**District Only Enforceable:**

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:
- a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;
  - b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
  - c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B,

except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166.

- d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
- g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40CFR82 Subpart A, Production and Consumption Controls. (Regulation 2.16, Section 4.1.5)

**EMISSION UNIT U2**

**U2 Emission Unit Description:** Dry-to-dry petroleum solvent dry cleaning machine.

**U2 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 60 Subpart JJJ	Standards of Performance for Petroleum Dry Cleaners	60.620, 60.621, 60.622, 60.623, 60.624 & 60.625
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 4, & 5

**U2 Emission Points:**

<b>ID</b>	<b>Description</b>	<b>Applicable Regulation(s)</b>	<b>Control ID</b>
E6	One (1) DF2000 dry to dry petroleum solvent dry cleaning machine. Make: Union. Model: HL-780. Installed: 2009.	7.25	C2

**U2 Control Devices:**

<b>ID</b>	<b>Description</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
C2	Refrigerated condenser	Temperature	F*

\*Note: This equipment vents inside the building.

## U2 Specific Conditions

### S1. Standards (Regulation 2.16, section 4.1.1)

#### VOC

- a. The owner or operator shall limit the plantwide VOC emissions to 40 tons per 12-consecutive month period. (Regulation 7.25, Section 3.1)(BACT) (See [Comment 1](#))
- b. The petroleum solvent dry cleaning dryer that is installed, shall be a solvent recovery dryer and shall be properly installed, operated, and maintained. (40 CFR 60.622(a)) (See [Comment 2](#))
- c. The petroleum solvent dry cleaning dryer shall have a flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle no greater than 0.05 liter per minute. (40 CFR 60.624) (See [Comment 2](#))
- d. The owner or operator shall include leak inspection and leak repair cycle information from the operating manual on a clearly visible label posted on the petroleum dryer. Such information should state: (40 CFR 60.622(c)) (See [Comment 2](#))

“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.”

### S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

#### VOC

- a. The owner or operator shall record the monthly amount of solvent used.
- b. The owner or operator shall monthly calculate and record the 12-consecutive month VOC emissions.
- c. The owner or operator shall inspect the equipment every 15 days for leaks and repair all leaks within 15 days. Records shall be maintained that include the date, time, and the initials of the person who inspected the equipment, if a leak was detected, and the date and time the leak was repaired. (See [Comment 2](#))

### S3. Reporting (Regulation 2.16, section 4.1.9.3)

#### VOC

- a. The emission point number.

- b. The monthly and twelve consecutive month VOC emissions for each month in the reporting period.
- c. The number of leaks detected during the reporting period; or a negative declaration if there were no leaks detected.
- d. The number of repairs that were made to correct the leaks if leaks were detected or a negative declaration if there were no leaks.
- e. Description of any corrective action taken for any exceedances or a negative declaration if there were no exceedances.

**S4. Testing** (Regulation 2.16, sections 4.1.9.3)

**VOC**

Each owner or operator of an affected facility subject to the provisions of 40 CFR 60.622(a) shall perform an initial test to verify that the flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle is no greater than 0.05 liters per minute. 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 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 by the length of time elapsed during the 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. (40 CFR 60.624) (See [Comment 2](#))

**U2 Comments**

1. The source is considered BACT for Regulation 7.25 since the machines are dry-to-dry machines.
2. This emission point was constructed after December 14, 1982, and is therefore subject to 40 CFR 60 Subpart JJJ. The source has submitted a letter to the US EPA, dated March 2, 2010, requesting an equivalency determination for this unit. The District has stayed the provisions of 40 CFR 60 Subpart JJJ until the EPA makes a decision on the applicability of the regulation on dry to dry machines.

3. This unit was previously permitted under Construction Permit 162-09-C.

**EMISSION UNIT U3**

**U3 Emission Unit Description:** Perchloroethylene dry-to-dry cleaning system.

**U3 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 4 & 5
40 CFR 63 Subpart M	National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	63.320, 63.321, 63.322, 63.323, 63.324 & 63.325

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Sections</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	2.10

**U3 Emission Points:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulations</b>	<b>Control ID</b>
E11	One (1) perchloroethylene dry-to-dry cleaning machine, Make: Realstar, Model: M-8039516, with a rated capacity of 95 lb clothing per hour controlled by a carbon adsorber and a refrigerated condenser.	7.25, 40 CFR 63 Subpart M	C3, C4

**U3 Control Devices:**

<b>ID</b>	<b>Description</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
C3	Refrigerated Condenser	Temperature	F*
C4	Carbon Adsorber	Concentration	F*

\*Note: This equipment vents inside the building.

### U3 Specific Conditions

#### S1. Standards (Regulation 2.16, section 4.1.1)

##### a. HAP

- i. The owner or operator shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device. (40 CFR 63.322(b)(1))
- ii. The owner or operator shall pass the air-perchloroethylene gas-vapor stream from inside the dry cleaning machine drum through a carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened. (40 CFR 63.322(b)(3))
- iii. Each carbon adsorber used for the purpose of complying with the emission standards and installed on a dry-to-dry machine:
  - (1) Shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time; and (40 CFR 63.322(g)(1))
  - (2) Shall be monitored according to one of the following: (40 CFR 63.322(g)(2))
    - (a) The owner or operator shall measure the concentration of perchloroethylene (PCE) in the exhaust of the carbon adsorber weekly with a colorimetric detector tube or PCE gas analyzer. The measurement shall be taken while the dry cleaning machine is venting to the carbon adsorber at the end of the last dry cleaning cycle prior to desorption of that carbon adsorber or removal of the activated carbon to determine that the PCE concentration in the exhaust is equal to or less than 10 parts per million per volume. The owner or operator shall: (40 CFR 63.323(b))
      - (i) Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 100 parts per million by volume of PCE in air to an accuracy of 25 parts per million by volume; and (40 CFR 63.323(b)(1))
      - (ii) Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions; and (40 CFR 63.323(b)(2))

- (iii) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet. (40 CFR 63.323(b)(3))

or

- (b) If the air-PCE gas vapor stream is passed through a carbon adsorber prior to machine door opening, the owner or operator of an affected facility shall measure the concentration of PCE in the dry cleaning machine drum at the end of the dry cleaning cycle weekly with a colorimetric detector tube or PCE gas analyzer to determine that the PCE concentration is equal to or less than 300 parts per million by volume. The owner or operator shall: (40 CFR 63.323(c))
  - (i) Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 300 parts per million by volume; and (40 CFR 63.323(c)(1))
  - (ii) Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions; and (40 CFR 63.323(c)(2))
  - (iii) Conduct weekly monitoring by inserting the colorimetric detector or PCE gas analyzer tube into the open space above the articles at the rear of the dry cleaning machine drum immediately upon opening the dry cleaning machine door. (40 CFR 63.323(c)(3))
- iv. The owner or operator 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. (40 CFR 63.322(c))
- v. The owner or operator shall operate and maintain the system according to the manufacturer's specifications and recommendations. (40 CFR 63.322(d))
- vi. Each refrigerated condenser used for the purposes of complying with the emission standards and installed on a dry-to-dry machine, dryer, or reclaimer: (40 CFR 63.322(e))

- (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating. (40 CFR 63.322(e)(1))
  - (2) The temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaimer, shall be equal to or less than 7.2°C (45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of  $\pm 1.1^\circ\text{C}$  ( $\pm 2^\circ\text{F}$ ). (40 CFR 63.322(e)(2) and 63.323(a)(1))
  - (3) The difference between the temperature of the air-perchloroethylene gas-vapor stream entering the refrigerated condenser on a washer and the temperature of the air-perchloroethylene gas-vapor stream exiting the refrigerated condenser on the washer shall be equal to or greater than 11.1°C (20°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure at least a temperature range from 0°C (32°F) to 48.9°C (120°F) to an accuracy of  $\pm 1.1^\circ\text{C}$  ( $\pm 2^\circ\text{F}$ ). (40 CFR 63.322(e)(2) and 63.323(a)(2))
  - (4) Shall prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser. (40 CFR 63.322(e)(3))
- vii. If the operating values of the refrigerated condenser or carbon adsorber do not meet the temperature values specified above, adjustments or repairs shall be made either to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for such parts shall be initiated within two (2) working days of detecting such a leak. Such repair parts shall be installed within five (5) working days after receipt. (40 CFR 63.322(n))
- viii. The owner or operator 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. (40 CFR 63.322(i))
- ix. The owner or operator shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still. (40 CFR 63.322(j))

x. **Perceptible Leak Check**

The owner or operator shall inspect for perceptible leaks (sight, smell, touch) while the dry cleaning system is operating. Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspections for perceptible leaks. The following components shall be inspected: (40 CFR 63.322 (k)(1)-(11) and 40 CFR 63.322(l))

- (1) Hose and pipe connections, fittings, couplings, and valves;
- (2) Door gaskets and seatings;
- (3) Filter gaskets and seatings;
- (4) Pumps
- (5) Solvent tanks and containers;
- (6) Water separators;
- (7) Muck cookers;
- (8) Stills
- (9) Exhaust dumpers;
- (10) Diverter valves; and
- (11) Cartridge filter housings.

xi. The owner or operator shall repair all perceptible leaks detected within twenty-four (24) hours. If repair parts must be ordered, either a written or verbal order of those parts shall be initiated within two (2) working days of detecting such a leak. Such repair parts shall be installed within five (5) working days after receipt. (40 CFR 63.322(m))

b. **VOC**

The owner or operator shall limit the plantwide VOC emissions to 40 tons per 12-consecutive month period. (Regulation 7.25, Section 3.1)(BACT) (See [Comment 1](#) and [Comment 2](#))

**S2. Monitoring and Recordkeeping** (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2))

a. **HAP**

- i. The owner or operator shall monthly sum and record the volume of all perchloroethylene purchases made in each of the previous twelve (12) months. (40 CFR 63.323 (d)(1)-(3))
- ii. **Perceptible Leak Check**
  - (1) The owner or operator shall conduct weekly perceptible leak inspections (sight, smell, touch) of the components outlined in Specific Condition [S1.a.x.\(1\)-\(11\)](#) while the dry cleaning system is in operation. The date of the inspection must be recorded. (40 CFR 63.322(k))
  - (2) If a leak is detected, the name or location of dry cleaning system components where perceptible leaks are detected must be recorded. In addition, written or verbal orders for repair parts, the date the part(s) was received, and the date the repair part(s) was installed must be recorded in order to demonstrate compliance with Specific Condition [S1.a.xi.](#)
- iii. **Cartridge Filters**
  - (1) The owner or operator shall monitor the frequency in which the cartridge filters are saturated and need to be drained. Cartridge filters shall be drained in either their housing or a sealed container for a minimum of 24 hours, or in an equivalent manner before removal from the dry cleaning facility.
  - (2) The date, start and stop time, and whether the cartridge filter was drained in either its housing or a sealed container must be recorded. If an equivalent manner for draining is used, the actions associated with this activity must be recorded before the removal of the filter from the dry cleaning facility.
- iv. **Refrigerated Condenser**

The owner or operator shall monitor the temperature of the air-perchloroethylene gas-vapor stream to demonstrate compliance with Specific Condition [S1.a.vi.\(2\)](#). The date and temperature sensor monitoring results must be recorded.
- v. **Carbon Adsorber**
  - (1) The owner or operator must measure the concentration of the perchloroethylene concentration weekly to demonstrate compliance with Specific Condition [S1.a.iii.\(2\)](#). The owner or

operator shall weekly record the date and concentration. (40 CFR 63.323)

(2) The owner or operator shall retain on site a copy of the design specifications and the operating manuals for each dry cleaning system and, if applicable, each emission control device located at the dry cleaning facility.

vi. The owner or operator shall retain on site a copy of the Material Safety Data Sheet (MSDS) for each HAP containing material used at this facility.

**b. VOC**

i. The owner or operator shall maintain monthly records of the quantity (in gallons) of solvent used during each month for spot cleaning.

ii. The owner or operator shall monthly calculate and record the 12 consecutive month VOC emissions.

**S3. Reporting** (Regulation 2.16, section 4.1.9.3)

**a. HAP**

i. The total plantwide consecutive 12-month quantity (in gallons) of perchloroethylene used for each month in the reporting period.

ii. For the carbon adsorber:

Identification of all periods when the concentration of the air-perchloroethylene gas-vapor stream was exceeded. The compliance report shall include the date, the concentration reading observed, the reason or cause for concentration in excess of the standard, the date any repair parts are installed, a description of any corrective action taken, and measures implemented to prevent reoccurrence of the situation that resulted in concentration in excess of the required standard specified in Specific Condition [S1.a.iii](#).

iii. For the refrigerated condenser:

Identification of all periods when the temperature of the air-perchloroethylene gas-vapor stream did not comply with the requirements specified in Specific Condition [S1.a.vi](#). The compliance report shall include the date, the temperature reading observed, the reason or cause for temperatures in excess of the standard, a description of any corrective action taken, and measures implemented to prevent reoccurrence of the situation that resulted in temperatures in excess of the required standard.

- iv. For the Perceptible and Probe Leak Checks:

Identification of all periods of failure to perform the weekly and monthly equipment inspections required by this permit.

- vi. Identification of all periods of failure to maintain the records required by this permit.

**b. VOC**

- i. The 12 consecutive month usage of spot cleaners for each month in the reporting period.
- ii. The 12 consecutive month VOC emissions.
- iii. Identification of all periods in which the 12 consecutive month VOC emission limit specified in Specific Condition [S1.b](#). was exceeded.

**U3 Comments**

1. The source is considered BACT for Regulation 7.25 since the Unit 2 machines are dry-to-dry machines.
2. The District has included emissions from spot cleaner usage in the existing limits of the permit for VOC operations.
3. This unit was previously permitted under Construction Permit 02-06-C.

**EMISSION UNIT U4****U4 Emission Unit Description:** Perchloroethylene dry-to-dry cleaning system.**U4 Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 4 & 5
40 CFR 63 Subpart M	National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	63.320, 63.321, 63.322, 63.323, 63.324 & 63.325

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Sections</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	2.10
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**U4 Emission Points:**

<b>Emission Point</b>	<b>Description</b>	<b>Applicable Regulations</b>	<b>Control ID</b>
E10	One (1) perchloroethylene dry-to-dry cleaning machine, Model #L-790 by Union, with a rated capacity of 90 lb clothing per hour controlled by a carbon adsorber and a refrigerated condenser.	7.25, 40 CFR 63 Subpart M	C5, C6

**U4 Control Devices:**

<b>ID</b>	<b>Description</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
C5	Refrigerated Condenser	Temperature	F*
C6	Carbon Adsorber	Concentration	F*

\*Note: This equipment vents inside the building.

**U4 Specific Conditions****S1. Standards** (Regulation 2.16, section 4.1.1)**a. HAP**

- i. The owner or operator shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device. (40 CFR 63.322(b)(1))
- ii. The owner or operator shall pass the air-perchloroethylene gas-vapor stream from inside the dry cleaning machine drum through a carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened. (40 CFR 63.322(b)(3))
- iii. Each carbon adsorber used for the purpose of complying with the emission standards and installed on a dry-to-dry machine:
  - (1) Shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time; and (40 CFR 63.322(g)(1))
  - (2) Shall be monitored according to one of the following: (40 CFR 63.322(g)(2))
    - (a) The owner or operator shall measure the concentration of perchloroethylene (PCE) in the exhaust of the carbon adsorber weekly with a colorimetric detector tube or PCE gas analyzer. The measurement shall be taken while the dry cleaning machine is venting to the carbon adsorber at the end of the last dry cleaning cycle prior to desorption of that carbon adsorber or removal of the activated carbon to determine that the PCE concentration in the exhaust is equal to or less than 10 parts per million per volume. The owner or operator shall: (40 CFR 63.323(b))
      - (i) Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 100 parts per million by volume of PCE in air to an accuracy of 25 parts per million by volume; and (40 CFR 63.323(b)(1))
      - (ii) Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions; and (40 CFR 63.323(b)(2))

- (iii) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet. (40 CFR 63.323(b)(3))

or

- (b) If the air-PCE gas vapor stream is passed through a carbon adsorber prior to machine door opening, the owner or operator of an affected facility shall measure the concentration of PCE in the dry cleaning machine drum at the end of the dry cleaning cycle weekly with a colorimetric detector tube or PCE gas analyzer to determine that the PCE concentration is equal to or less than 300 parts per million by volume. The owner or operator shall:
  - (i) Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 300 parts per million by volume; and (40 CFR 63.323(c)(1))
  - (ii) Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions; and (40 CFR 63.323(c)(2))
  - (iii) Conduct weekly monitoring by inserting the colorimetric detector or PCE gas analyzer tube into the open space above the articles at the rear of the dry cleaning machine drum immediately upon opening the dry cleaning machine door. (40 CFR 63.323(c)(3))
- iv. The owner or operator 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. (40 CFR 63.322(c))
- v. The owner or operator shall operate and maintain the system according to the manufacturer's specifications and recommendations. (40 CFR 63.322(d))
- vi. Each refrigerated condenser used for the purposes of complying with the emission standards and installed on a dry-to-dry machine, dryer, or reclaimer: (40 CFR 63.322(e))
  - (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the

- atmosphere while the dry cleaning machine drum is rotating. (40 CFR 63.322(e)(1))
- (2) The temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaiming machine, shall be equal to or less than 7.2°C (45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of  $\pm 1.1^\circ\text{C}$  ( $\pm 2^\circ\text{F}$ ). (40 CFR 63.322(e)(2) and 63.323(a)(1))
  - (3) The difference between the temperature of the air-perchloroethylene gas-vapor stream entering the refrigerated condenser on a washer and the temperature of the air-perchloroethylene gas-vapor stream exiting the refrigerated condenser on the washer shall be equal to or greater than 11.1°C (20°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure at least a temperature range from 0°C (32°F) to 48.9°C (120°F) to an accuracy of  $\pm 1.1^\circ\text{C}$  ( $\pm 2^\circ\text{F}$ ). (40 CFR 63.322(e)(2) and 63.323(a)(2))
  - (4) Shall prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser. (40 CFR 63.322(e)(3))
- vii. If the operating values of the refrigerated condenser or carbon adsorber do not meet the temperature values specified above, adjustments or repairs shall be made either to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for such parts shall be initiated within two (2) working days of detecting such a leak. Such repair parts shall be installed within five (5) working days after receipt. (40 CFR 63.322(n))
  - viii. The owner or operator 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. (40 CFR 63.322(i))
  - ix. The owner or operator shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still. (40 CFR 63.322(j))
  - x. Perceptible Leak Check

The owner or operator shall inspect for perceptible leaks (sight, smell, touch) while the dry cleaning system is operating. Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspections for perceptible leaks. The following components shall be inspected: (40 CFR 63.322 (k)(1)-(11) and 40 CFR 63.322(l))

- (1) Hose and pipe connections, fittings, couplings, and valves;
- (2) Door gaskets and seatings;
- (3) Filter gaskets and seatings;
- (4) Pumps
- (5) Solvent tanks and containers;
- (6) Water separators;
- (7) Muck cookers;
- (8) Stills;
- (9) Exhaust dumpers;
- (10) Diverter valves; and
- (11) Cartridge filter housings.

- xi. The owner or operator shall repair all perceptible leaks detected within twenty-four (24) hours. If repair parts must be ordered, either a written or verbal order of those parts shall be initiated within two (2) working days of detecting such a leak. Such repair parts shall be installed within five (5) working days after receipt. (40 CFR 63.322(m))

**b. VOC**

The owner or operator shall limit the plantwide VOC emissions to 40 tons per 12-consecutive month period. (Regulation 7.25, section 3.1)(BACT) (See [Comment 1](#) and [Comment 2](#))

**S2. Monitoring and Recordkeeping** (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2))

**a. HAP**

- i. The owner or operator shall monthly sum and record the volume of all perchloroethylene purchases made in each of the previous twelve (12) months. (40 CFR 63.323 (d)(1)-(3))
- ii. **Perceptible Leak Check**
  - (1) The owner or operator shall conduct weekly perceptible leak inspections (sight, smell, touch) of the components outlined in Specific Condition [S1.a.x.\(1\)-\(11\)](#) while the dry cleaning system is in operation. The date of the inspection must be recorded. (40 CFR 63.322(k))
  - (2) If a leak is detected, the name or location of dry cleaning system components where perceptible leaks are detected must be recorded. In addition, written or verbal orders for repair parts, the date the part(s) was received, and the date the repair part(s) was installed must be recorded in order to demonstrate compliance with Specific Condition [S1.a.xi.](#)
- iii. **Cartridge Filters**
  - (1) The owner or operator shall monitor the frequency in which the cartridge filters are saturated and need to be drained. Cartridge filters shall be drained in either their housing or a sealed container for a minimum of 24 hours, or in an equivalent manner before removal from the dry cleaning facility.
  - (2) The date, start and stop time, and whether the cartridge filter was drained in either its housing or a sealed container must be recorded. If an equivalent manner for draining is used, the actions associated with this activity must be recorded before the removal of the filter from the dry cleaning facility.
- iv. **Refrigerated Condenser**

The owner or operator shall monitor the temperature of the air-perchloroethylene gas-vapor stream to demonstrate compliance with Specific Condition [S1.a.vi.\(2\)](#). The date and temperature sensor monitoring results must be recorded.
- v. **Carbon Adsorber**
  - (1) The owner or operator must measure the concentration of the perchloroethylene weekly to demonstrate compliance with Specific Condition [S1.a.iii.\(2\)](#). The owner or operator shall weekly record the date and concentration. (40 CFR 63.323)

- (2) The owner or operator shall retain on site a copy of the design specifications and the operating manuals for each dry cleaning system and, if applicable, each emission control device located at the dry cleaning facility.
- vi. The owner or operator shall retain on site a copy of the Material Safety Data Sheet (MSDS) for each HAP containing material used at this facility.
- b. **VOC**
  - i. The owner or operator shall maintain monthly records of the quantity (in gallons) of solvent used during each month for spot cleaning.
  - ii. The owner or operator shall monthly calculate and record the 12 consecutive month VOC emissions.

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **HAP**

**The total plant-wide consecutive 12-month quantity (in gallons) of perchloroethylene used for each month in the reporting period.**

- ii. For the carbon adsorber:

Identification of all periods when the concentration of the air-perchloroethylene gas-vapor stream was exceeded. The compliance report shall include the date, the concentration reading observed, the reason or cause for concentration in excess of the standard, the date any repair parts are installed, a description of any corrective action taken, and measures implemented to prevent reoccurrence of the situation that resulted in concentration in excess of the required standard specified in Specific Condition [S1.a.iii.](#)

- iii. For the refrigerated condenser:

Identification of all periods when the temperature of the air-perchloroethylene gas-vapor stream did not comply with the requirements specified in Specific Condition [S1.a.vi.](#) The compliance report shall include the date, the temperature reading observed, the reason or cause for temperatures in excess of the standard, a description of any corrective action taken, and measures implemented to prevent reoccurrence of the situation that resulted in temperatures in excess of the required standard.

- iv. For the Perceptible and Probe Leak Checks:

Identification of all periods of failure to perform the weekly and monthly equipment inspections required by this permit.

- v. Identification of all periods of failure to maintain the records required by this permit.

**b. VOC**

- i. The 12 consecutive month usage of spot cleaners for each month in the reporting period.
- ii. The 12 consecutive month VOC emissions.
- iii. Identification of all periods in which the 12 consecutive month VOC emission limit specified in Specific Condition [S1.b.](#) was exceeded.

**U4 Comments**

1. The source is considered BACT for Regulation 7.25 since the Unit 2 machines are dry-to-dry machines.
2. The District has included emissions from spot cleaner usage in the existing limits of the permit for VOC operations.
3. The source has permanently disabled the equipment previously permitted as Emission Unit U1 per a letter to the District dated November 1, 2011. Therefore, U1 has been removed from the permit.

### Permit Shield

The owner or operator has requested and is hereby granted a permit shield. The permit shield applies as long as the owner or operator operates in accordance with the terms and conditions of this permit. The following rules have been reviewed by the District and determined not to be applicable to the emission units and/or emission points listed.

### Off-Permit Documents

There are no off permit documents associated with this Title V permit.

### Alternative Operating Scenarios

The company requested no alternative operating scenario in its Title V application.

### Source-Wide HAP Speciation

HAP	CAS #
Perchloroethylene	127-18-4

### Insignificant Activities

Equipment	Quantity	Basis for Exemption
Natural Gas Boiler (5.85 MM Btu/hr heat input capacity)	1	Regulation 2.02, section 2.1.1

- 1) Insignificant activities identified in District Regulation 2.02 Section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 2.02 Section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.
- 3) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed.
- 4) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.
- 6) The owner or operator elected to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions to be reported on the annual emission inventory.