

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Dador, Inc.  
Attn: James Dorman  
1529 West Howard Street  
Chicago, Illinois 60626

<u>Application No.:</u> 96030212	<u>I.D. No.:</u> 031600CXL
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 15, 2003
<u>Subject:</u> Petroleum Solvent Dry Cleaner	
<u>Date Issued:</u> October 8, 2003	<u>Expiration Date:</u> June 24, 2008
<u>Location:</u> 1529 West Howard Street, Chicago	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two petroleum solvent washers and three solvent dryers controlled by three solvent reclaimers and one boiler pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emission of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic materials (VOM)). As a result, the source is excluded from requirements to obtain a Clean Air Act Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. The petroleum solvent dry cleaning dryer constructed after December 14, 1982 is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and JJJ. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
    - b. Each affected petroleum solvent dry cleaning dryer that is installed at a petroleum dry cleaning plant after December 14, 1982, shall be a solvent recovery dryer. The solvent recovery dryer(s) shall be properly installed, operated, and maintained (40 CFR 60.622).
    - c. Each affected petroleum solvent filter that is installed at a petroleum dry cleaning plant after December 14, 1982, shall be a cartridge filter. Cartridge filters shall be drained in their sealed housings for at least 8 hours prior to their removal (40 CFR 60.622).

- d. The solvent recovery cycle shall continue until the flow rate of recovered solvent from the solvent recovery dryer is no greater than 0.05 liters per minute (40 CFR 60.624).
- 3a. This permit is issued based upon the facility not being subject to 35 Ill. Adm. Code 218, Subpart Z: Dry Cleaners, because of the federally enforceable conditions of this permit limiting facility's potential to emit VOM to less than 25 tons/year, pursuant to 35 Ill. Adm. Code 218.611(b).
- c. This permit is issued based upon the facility not being subject to 35 Ill. Adm. Code 218, Subpart G: Use of Organic Material, due to use of non-photochemically reactive cleaning solvent.
- 4. Emissions and operation of petroleum solvent dry cleaning process shall not exceed the following limits:

Petroleum Solvent Usage		VOM Emissions	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1,000	7,500	3.3	24.4

These limits are based on the maximum petroleum solvent usage in dry cleaning process. Emissions were determined by material balance considering a solvent density of 6.5 lb/gal.

Solvent usage shall be determined from the following equation:

$$U = V - W \times C/100,$$

Where:

U - Solvent usage;

V - Virgin solvent added to the process (gal);

W - Certified amount of waste shipped off for recycling (gal);

C - Certified VOM content of waste solvent (wt %).

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

- 5. Operation and emissions of the natural gas fired equipment shall not exceed the following limits:

Natural Gas Usage: 5 mmscf/month, 50 mmscf/year

<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO <sub>x</sub> )	100	0.3	2.5
Carbon Monoxide (CO)	84	0.2	2.1
Volatile Organic Materials (VOM)	5.5	0.01	0.1

These limits are based on maximum firing rate and standard emission factors for natural gas combustion. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The Permittee shall maintain monthly records of the following items:
  - a. Petroleum solvent purchased (gallons/month and gallons/year).
  - b. Petroleum solvent shipped off for recycling (gallons/month and gallons/year).
  - c. Gas consumption in the boiler (mmscf/month and mmscf/year).
  - d. MSDS of petroleum solvent(s).
  - e. VOM emissions calculation (tons/month and tons/year).
  
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Agency request for records during the course of a source inspection.
  
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
  
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
 Division of Air Pollution Control  
 Compliance Section (#40)  
 P.O. Box 19276  
 Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 600169

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. petroleum solvent usage (gallons/month and gallons/year); and
  - b. gas consumption (mmscf/month and mmscf/year).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

It should be noted that this permit has been revised to change monthly limits on solvent usage and VOM emissions.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the petroleum solvent dry cleaning plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This plant will use 7,500 gal of petroleum solvent and will consume 50 mmscf per year of natural gas. The resulting maximum emissions are below the levels, e.g., 25 ton/yr of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program.

1. Emissions from the petroleum solvent dry cleaning process

Petroleum Solvent Usage		VOM Emissions	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1,000	7,500	3.3	24.4

2. Operation and emissions of the natural gas fired boiler shall not exceed the following limits:

Natural Gas Usage: 5 mmscf/month, 50 mmscf/year

<u>Pollutant</u>	Emission Factor <u>(Lb/mmscf)</u>	Emissions	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO <sub>x</sub> )	100	0.3	2.5
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