

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
REVISED

PERMITTEE

Herff Jones Cap & Gown Division  
Attn: Gary Gonzini  
1000 North Market Street  
Champaign, Illinois 61820

Application No.: 73010578                      I.D. No.: 019010AAS  
Applicant's Designation: EPA PERMITS       Date Received: April 29, 2010  
Subject: Cap and Gown Dry Cleaning  
Date Issued: August 31, 2010               Expiration Date: June 5, 2011  
Location: 1000 North Market Street, Champaign, Champaign County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

<u>Equipment</u>	<u>Manufacturer</u>	<u>Number of Units</u>	
Gown Washer	Washex	1	
Gown Dryer	ACECO	3	Backup-Hoyt/Dynamic
Gown Dryer	Dynamic	1	
Gown Dryer	Hoyt	5	
Cap Washer	Milnor	1	
Cap Extractor	Milnor	1	
Cap Extractor	Hammond	3	
Cap Washer	Hansvedt	1	
Cap Dryer	Rockwell-Ross	3	
Boiler A	Abco	1	
Boiler B and C	Vapor	2	Backups to Boiler A
360 Solvent Tank	2,000 gallon	1	
Mix/Recycle/Hold Tanks	Less than 1001 Gallon	2	

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 emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit 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 initial issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permits issued for this location.
2. Boiler A is subject to a New Source Performance Standard (NSPS) for Small Industrial Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- 3a. The five(5) Hoyt gown dryers, which were installed on January 3, 1994, are subject to the New Source Performance Standards(NSPS) for Petroleum Dry Cleaning, 40 CFR 60 Subparts A and JJJ. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.622(a), 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.
  - c. Pursuant to 40 CFR 60.622(b), 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.
- 4a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
5. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35

Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.

6. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
7. The following petroleum dry cleaning machines are exempt from New Source Performance Standards (NSPS) for Petroleum Dry Cleaning Subpart JJJ, because they were constructed before December 14, 1982:
  - One (1) Washex Gown Washer;
  - Three (3) ACECO Gown Dryers;
  - One (1) Dynamic Gown Dryer;
  - One (1) Milnor Cap Washer;
  - One (1) Milnor Cap Extractor;
  - Three (3) Hammond Cap Extractors;
  - One (1) Hansvedt Cap Washer; and
  - Three (3) Rockwell-Ross Cap Dryers
8. Pursuant to 35 Ill. Adm. Code 215.611, the provisions of 35 Ill. Adm. Code 215.607 through 215.610 shall not apply to petroleum solvent dry cleaning facilities whose emissions of volatile organic material do not exceed 91 megagrams (100 tons) per year in the absence of pollution control equipment or whose emissions of volatile organic material, as limited by the operating permit, will not exceed 91 megagrams (100 tons) per year in the absence of pollution control equipment.
9. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
10. Natural gas shall be the only fuel(s) fired in Boilers A and B. The use of any other fuel in the Boilers requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 11a. Emissions and operation of all petroleum dry cleaning operations, including solvent tank and mix/recycle/hold tanks, shall not exceed the following limits:

<u>Equipment Area</u>	<u>Solvent Usage (Gal/Yr)</u>	<u>VOM Content (Lbs/Gal)</u>	<u>VOM Emissions (Tons/Yr)</u>
Gown Cleaning	25,505	6.43	82.0
Cap Cleaning	3,956	6.32	12.5
Misc. Cleaning	157	6.38	0.5
		Total:	95.0

These limits are based on the use of stoddard solvents only, any solvent reclaimed and shipped off-site considered to be solvent usage, maximum VOM contents and all VOM emitted.

- b. Emissions and operation of the 3 boilers shall not exceed the following limits:

<u>Natural Gas Usage</u>		<u>NO<sub>x</sub></u>		<u>CO</u>		<u>SO<sub>2</sub></u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
28	280	1.4	14	1.2	11.8	0.009	0.084
<u>VOM</u>		<u>PM</u>					
<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>				
0.08	0.8	0.1	1.1				

These limits are based on maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 40 CFR 60.8(a), at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).
- b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:
- i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;

- ii. Approves the use of an equivalent method;
  - iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;
  - iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or
  - v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.
- c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.
- d. Pursuant to 40 CFR 60.8(d), the owner or operator of an affected facility shall provide the Illinois EPA or USEPA at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Illinois EPA or USEPA the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Illinois EPA or USEPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Illinois EPA or USEPA by mutual agreement.
- e. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
- i. Sampling ports adequate for test methods applicable to such facility. This includes:
    - A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can

be accurately determined by applicable test 1 methods and procedures; and

B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.

ii. Safe sampling platform(s).

iii. Safe access to sampling platform(s).

iv. Utilities for sampling and testing equipment.

f. Pursuant to 40 CFR 60.8(f), unless otherwise specified in the applicable subpart of 40 CFR Part 60, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard under 40 CFR Part 60. For the purpose of determining compliance with an applicable standard under 40 CFR Part 60, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Illinois EPA's or USEPA's approval, be determined using the arithmetic mean of the results of the two other runs.

13. Pursuant to 40 CFR 60.624, 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.

14. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
15. Pursuant to 40 CFR 60.625, each owner or operator of an affected facility subject to the provisions of 40 CFR 60 Subpart JJJ shall maintain a record of the performance test required under 40 CFR 60.624.
- 16a.
  - i. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.
  - ii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
  - iii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42C to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
- b. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48 shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
- 17a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Solvent usage (gallons/month and gallons/year);

- ii. VOM and HAP content of each solvent (lb/gallon);
  - iii. Certified amount of waste solvent shipped off site (tons/month, tons/year);
  - iv. Certified VOM and HAP content of the waste solvent (weight %);
  - v. Natural gas consumption (mmscf/month and mmscf/year); and
  - vi. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs, with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
18. Pursuant to 40 CFR 60.7(a)(4), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
- 19a. If there is an exceedance of or a deviation from 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 or deviation. 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 deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications 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  
2009 Mall Street  
Collinsville, Illinois 62234

It should be noted that this permit has been corrected to state that the 5  
hojt dryers are subject to NSPS Subpart JJJ.

If you have any questions on this, please call Randy Solomon at  
217/782-2113.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed:

ECB:RBS:jws

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source 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. The resulting maximum emissions are below the levels, (e.g., 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of any combination of such HAPs), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	Emissions (Tons/Year)					<u>Single HAP</u>	<u>Total HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>		
Petroleum Dry Cleaning					95.00		
3 Boilers	<u>11.8</u>	<u>14</u>	<u>1.1</u>	<u>0.084</u>	<u>0.80</u>	<u>--</u>	<u>--</u>
Totals	<u>11.8</u>	<u>14</u>	<u>1.1</u>	<u>0.084</u>	<u>96.24</u>	<u>9.0</u>	<u>22.5</u>