

State of Georgia

Department of Natural Resources
Environmental Protection Division
Air Protection Branch



GENERIC AIR QUALITY PERMIT

Permit No. 7212-GEN-0003

Effective Date JAN 0 4 2008

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under that Act, the holder of this permit is issued a State Implementation Plan (SIP) operating permit for the following:

A perchloroethylene drycleaning facility with dry-to-dry machines using less than 2100 gallons of perchloroethylene during any 12 consecutive months as determined on the 1st of every month. A Facility that uses less than 2100 gallons of perchloroethylene during any 12 consecutive months is considered an "Area Source".

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with Georgia or Federal Air Quality rules; for any misrepresentation made in the initial notification forms, supporting data entered therein or attached thereto; or for any alterations affecting the emissions from this source that are not authorized by this permit.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in the attached 6 pages, which pages are a part of this Permit.

Carol A. Couch, Ph.D., Director Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, 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 Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall comply with 40 CFR Part 63 Subpart M, "The Perchloroethylene Dry Cleaning NESHAP," at all times.
- 1.3 After July 27, 2008, the Permittee shall not operate any transfer perchloroethylene drycleaning machines at their facility.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not use more than 2100 gallons of perchloroethylene during any 12 consecutive months as determined by the perchloroethylene purchase receipts for this period.
- 2.2 The Permittee shall close the door of each drycleaning machine immediately after transferring articles to or from the machine and shall keep the door closed at all other times. (§63.322 (c)).
- 2.3 If the facility uses more than 2100 gallons of perchloroethylene during any 12 consecutive month period, the Permittee must comply with the Major Source provisions in Subpart M within 30 days.
- 2.4 The Permittee shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours before removal from the drycleaning facility. (§63.322(i)).
- 2.5 The Permittee shall store all perchloroethylene and all waste that contains perchloroethylene in a sealed solvent tank or solvent container 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. (§63.322(j)).

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- 2.6 The Permittee shall eliminate any emission of perchloroethylene from any drycleaning system that is installed after December 21, 2005 in a building with a residence.
- 2.7 After December 21, 2020, the Permittee shall eliminate any emission of perchloroethylene from any drycleaning system that is located in a building with a residence.

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

4. Process & Control Equipment

- 4.1 The Permittee shall operate each drycleaning system, including the air pollution control equipment, according to manufacturer's specifications and recommendations.
- 4.2 The Permittee shall route the air-perchloroethylene gas-vapor stream contained within each drycleaning machine to a refrigerated condenser with the exception of:
 - (i) Drycleaning machines installed before December 9, 1991 at facilities using less than 140 gallons of perchloroethylene per 12 consecutive months (§63.322(b)(1)).
 - (ii) A carbon adsorber installed before September 22, 1993 can be used as an alternative to the refrigerated condenser. (§63.322(a)(2)).
- 4.3 Each refrigerated condenser installed on a dry-to-dry machine:
 - (i) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the drycleaning machine to the atmosphere while the drycleaning machine drum is rotating (§63.322(e)(1)); and
 - (ii) Shall be operated to prevent air drawn into the drycleaning machine when the door of the machine is open from passing through the refrigerated condenser.(§63.322(e)(3)).
- 4.4 The Permittee shall not bypass any carbon adsorber used in compliance with Condition 4.2 to vent or release any air perchloroethylene gas vapor stream to the atmosphere at any time (§63.322(g)(1)).
- 4.5 Machines installed after December 21, 2005 must be non-vented dry-to-dry type with a refrigerated condenser and secondary carbon absorber. (§63.322(o)(2)).

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5. Monitoring

- 5.1 The Permittee shall inspect the following components weekly for any perceptible leaks while the drycleaning system is operating: (§63.322(k) and (l)).
 - a) Hose and piping connections, fittings, couplings and valves.
 - b) Door gaskets and seatings;
 - c) Filter gaskets and seatings;
 - d) Pumps;
 - e) Solvent tanks and containers;
 - f) Water separators;
 - g) Muck cookers;
 - h) Stills;
 - i) Exhaust dampers;
 - j) Diverter valves; and
 - k) Cartridge filter housing.
- 5.2 After July 27, 2008, the components listed in Condition 5.1 shall also be inspected for leaks using a halogenated hydrocarbon leak detector at least once per month (enhanced leak detection). (§63.322(o)).
- 5.3 All leaks detected during the inspections specified in Conditions 5.1 and 5.2 should be repaired within 24 hours after detection. If repair parts must be ordered, either a written or a verbal order must be placed within 2 working days after detection of the leak. Such repairs must be completed within 5 working days after receipt of the parts(s). (§63.322(m)).
- 5.4 Once every week the Permittee shall monitor the refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions; or
 - a) If the machine is not equipped with refrigeration system pressure gauges, the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, or the reclaimer shall be monitored with a temperature sensor to determine if it is equal to or less than 7.2°C (45°F) before the end of the cooldown or drying cycle while the gas-vapor stream is flowing through the condenser; and
 - b) The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 45 °F (7.2°C) to an accuracy of $\pm 2F$ ° (± 1.1 °C). The difference between the inlet and outlet temperatures shall be calculated weekly from the measured valves. ($\S 63.323(a)(2)$).

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- 5.5 If your drycleaning machine was installed before September 22, 1993 and has a carbon adsorber as a primary control device, the Permittee shall measure the concentration of perchloroethylene in the exhaust of the carbon adsorber with a colorimetric detector tube or perchloroethylene gas analyzer once every week. This shall be done when the drycleaning machine is venting to the carbon adsorber at the end of the last drycleaning cycle prior to desorption of the carbon adsorber. The concentration of perchloroethylene in the exhaust should be less than or equal to 100 ppm by volume. The Permittee shall use a colorimetric detector tube or perchloroethylene gas analyzer designed to measure a concentration of 100 ppm with an accuracy of +/-25 ppm and shall use the detector tube or gas analyzer according to manufacturer's instructions. The sampling port should be located at least 8 stack or duct diameters downstream from any bend or flow disturbance and 2 stack or duct diameters upstream from any bend or flow disturbance and 2 stack or duct diameters upstream from any bend or flow disturbance. (§63.323(b)).
- 5.6 If your drycleaning machine is equipped with a secondary carbon adsorber, the Permittee shall monitor once every week the perchloroethylene concentration in the open space above the articles at the rear of the drycleaning machine drum immediately upon opening the drycleaning machine door using a colorimetric detector tube or perchloroethylene gas analyzer with an accuracy of +/-75 ppm at 300 ppm perchloroethylene. The concentration in the open space should be less than or equal to 300 ppm by volume. (§63.323(c)).
- 5.7 If the parameter values monitored under Conditions 5.4, 5.5, or 5.6 do not meet the specified values, adjustments or repairs should be made to the drycleaning system or control device to meet those values. If repair parts must be ordered, either a written or a verbal order for such parts must be initiated within 2 working days of detecting such a parameter value. Such repair parts must be installed within 5 days after the receipt of the repair parts. (§63.322(m)).

6. Performance Testing

[None required].

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall keep receipts of all perchloroethylene purchases and a log of following information in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
 - i) The volume of perchlorethylene purchased each month by the drycleaning facility and calculation of perchloroethylene purchases for the previous 12 months determined on the first day of every month. If no perchloroethylene is purchased during a given month, the Permittee shall enter zero gallons in the log.

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- ii) The Permittee shall maintain records of the leak inspections. The records shall indicate the dates of weekly inspections for detection of perceptible leaks as described in Condition 5.1 and monthly inspections using enhanced leak detection techniques as described in Condition 5.2 and the name or location of components where the leaks were detected.
- iii) If a leak is detected, dates on which repair work was performed and parts were ordered.
- 7.2 The Permittee shall keep records of the date and pressure or temperature sensor monitoring results for each refrigerated condenser in use, as specified in Condition 5.4. (§63.324(d)(5)).
- 7.3 If the primary control device is a carbon adsorber, the Permittee shall keep records of the date and concentration of perchloroethylene as specified in Condition 5.5. (§63.324(d)(6)).
- 7.4 If your drycleaning machine is equipped with a carbon adsorber as a secondary control device, the Permittee shall keep records of the date and concentration of perchloroethylene in the drum as specified in Condition 5.6. (§63.324(d)(6)).
- 7.5 The Permittee shall maintain on site copies of the design specifications and operating manuals for each drycleaning system and each emission control device located at the facility. (§63.324(e)).
- 7.6 The Permittee shall submit to the Georgia Environmental Protection Division a statement by registered or certified mail, signed by a responsible official if the facility exceeds the limits of perchloroethylene usage as specified in Condition 2.1. This shall be done within 30 days after the end of the 12 month period during which the exceedance occurred. The statement shall include the new perchloroethylene usage rate and a certification that the facility is in compliance with all the applicable requirements. (§63.324(c)).
- 7.7 The Permittee shall submit a compliance report signed by a responsible official within 30 days after the installation of the new machine. The report shall contain the annual perchloroethylene usage, whether or not they are in compliance with all the applicable requirements of 40 CFR 63 Subpart M, and a statement that all information contained in the report is accurate. (§63.324(b)).
- 7.8 The Permittee shall submit to the Georgia Environmental Protection Division by registered mail on or before July 28, 2008 a notification of compliance status providing the following information and signed by a responsible official who shall certify it's accuracy:

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- (1) The name and address of the owner or operator;
- (2) The address (that is, physical location) of the drycleaning facility;
- (3) If they are located in a building with a residence(s), even if the residence is vacant at the time of this notification;
- (4) If they are located in a building with no other tenants, leased space, or owner occupants;
- (5) Whether they are a major or area source;
- (6) The yearly perchloroethylene solvent consumption based upon the yearly solvent consumption calculated according to §63.323(d);
- (7) Whether or not they are in compliance with each applicable requirement of §63.322; and
- (8) All information contained in the statement is accurate and true.

If the perchloroethylene drycleaning starts operation after July 28, 2008, then the notification for compliance status is required within 30 days for startup (§63.324(f)).

7.9 If the facility uses more than 2100 gallons of perchloroethylene during any 12 consecutive month period, the Permittee must submit a Title V Operating Permit Application to the Division within 180 days from the date the 12 consecutive month consumption of perchloroethylene exceeded 2100 gallons.

8. Special Conditions

8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.