

ASSIGNMENT

to

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
 1010 Main Street
 Springfield, OR 97477
 (541) 736-1056

PERMITTEE:

ABC Cleaners
 2530 Willakenzie Rd.
 Eugene, OR 97401

INFORMATION RELIED UPON:

Application No.: 56457
 Date Received: July 22, 2011 and August 4,
 2011

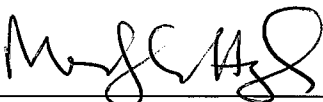
PLANT SITE LOCATION:

2530 Willakenzie Rd.
 Eugene, OR 97401

LAND USE COMPATIBILITY
STATEMENT: July 8, 2011

Approving Authority: City of Eugene

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060(2) and based on the land use compatibility findings included in the permit record (note: land use compatibility statements are not applicable to portable sources).



Merlyn L. Hough, Director

OCT 11 2011

Dated

General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-006	9/2/21	Perchloroethylene Dry Cleaning Operations subject to an Area Source NESHAP, excluding perchloroethylene dry cleaning operations registered pursuant to LRAPA 34-025-2	7216

SUPPLEMENTAL INFORMATION:

Facility contact:		
Name:	Inbae Park, owner	
Phone number:	541-344-6899	
Facsimile number:	541-344-4022	
e-mail address:	noumbrellas@gmail.com	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subpart M
Reports Required:		
Annual	Yes	March 1st
NSPS	No	N/A
NESHAP	No	N/A
Other	No	N/A
Public Notice	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and incorporated into Title 37 Section 37-0060 by LRAPA for the following source category:

Dry cleaners using perchloroethylene subject to 40 CFR part 63 subpart M as adopted under LRAPA Title 44, SIC 7216.

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Signature on file

September 2, 2011

Merlyn L. Hough, Director

Dated

TABLE OF CONTENTS

1.0	PERMIT ASSIGNMENT	2
2.0	GENERAL EMISSION STANDARDS AND LIMITS	3
3.0	OPERATION AND MAINTENANCE REQUIREMENTS	3
4.0	COMPLIANCE DEMONSTRATION	5
5.0	RECORDKEEPING REQUIRMENTS	5
6.0	REPORTING REQUIREMENTS	6
7.0	ADMINISTRATIVE REQUIREMENTS	7
8.0	FEES	8
9.0	GENERAL CONDITIONS AND DISCLAIMERS	8
10.0	ABBREVIATIONS, ACRONYMS, AND DEFINITIONS	9

1.0 PERMIT ASSIGNMENT

- 1.1. Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing perchloroethylene dry cleaning as listed on the cover page of this permit, including supporting activities.
 - b. A Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2. Assignment** LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with the LRAPA's Air Quality regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the requirements of this permit.

- 1.3. Permitted Activities** This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as conditions of this permit are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Simple or Standard Permit or General ACDP Attachments, if applicable.
- 1.4. Relation to local land use laws** This permit is not valid outside of Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1. Nuisance and Odors** The permittee must not allow the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by LRAPA personnel.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 3.1. Work practices**
- a. The permittee must operate and maintain the dry cleaning system according to the manufacturers' specifications and recommendations.
 - b. The permittee must close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and must keep the door closed at all other times.
 - c. The permittee must drain all cartridge filters in their housing or other sealed container, for a minimum of 24 hours, or must treat such filters in an equivalent manner, before removal from the dry cleaning facility.
 - d. The permittee must store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. Containers for

separator water must be covered except to empty the container.

- 3.2. Refrigerated Condenser** The permittee must route the air-perchloroethylene stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device.
- a. The refrigerated condenser must be operated to not vent or release the air-perchloroethylene stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating.
 - b. The refrigerated condenser must prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- 3.3. Carbon Adsorber** For each dry cleaning system purchased after December 21, 2005, the permittee must route the air-perchloroethylene stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine when the door is opened. The carbon adsorber must be desorbed in accordance with manufacturer's instructions.
- 3.4. Leak Detection** The permittee must inspect the following components weekly for vapor leaks while the dry cleaning system is operating and using a halogenated hydrocarbon detector or PCE gas analyzer that is operated according to the manufacturer's instructions. The operator must place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface surface.
- a. Hose and pipe 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. All filter housings.
- 3.5. Leake Repair** The permittee must repair all leaks within 24 hours of detection. If

repair parts must be ordered, either a written or a verbal order for those parts must be initiated within two working days of detecting such a leak. Such repair parts must be installed within five working days after receipt.

3.6. Equipment Repair

If the refrigerated system high pressure and low pressure are not in the range specified in the manufacturer's operating instructions or the outlet temperature does not meet the values specified in Condition 4.1b.iii, adjustments or repairs must be made to the dry cleaning system or refrigerated condenser to meet those values. If repair parts must be ordered, either a written or verbal order for such parts must be initiated within two working days of detecting such a parameter value. Such repair parts must be installed within five working days after receipt.

4.0 COMPLIANCE DEMONSTRATION

**4.1. Refrigerated
Condenser
Temperature
Monitoring**

The permittee must measure the parameters in either Condition 4.1.a. or 4.1.b. on a weekly basis:

- a. 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
- b. The gas-vapor stream temperature on the outlet side of the refrigerated condenser using a temperature sensor.
 - i. The temperature must be measured before the end of the cool-down or drying cycle and while the gas-vapor steam is flowing through the condenser.
 - ii. The temperature sensor must be used according to the manufacturer's instructions and must be designed to measure a temperature of 7.2°C (45°F) to an accuracy of $\pm 1.1^\circ\text{C}$ ($\pm 2^\circ\text{F}$).
 - iii. The refrigerated condenser is operating correctly if the measured temperature is equal to or less than 7.2°C (45°F).

5.0 RECORDKEEPING REQUIRMENTS

**5.1. Recordkeeping
Logs**

The permittee must keep the following records. The Oregon Dry Cleaner Compliance Calendar or other equivalent recordkeeping

log may be used for this purpose

- a. The dates when the dry cleaning system components are inspected for leaks, as specified in Conditions 3.4, and the name or location of dry cleaning system components where leaks are detected;
- b. The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with Conditions 3.5 and 3.6;
- c. The date and high pressure and low pressure results, if applicable, as specified in Condition 4.1a;
- d. The date and temperature sensor monitoring results, if applicable, as specified in Condition 4.1b;
- e. Quantity and date of perchloroethylene purchases.

- 5.2. Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.
- 5.3. Operating Manuals** The permittee must retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility.
- 5.4. Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of five years and made available to LRAPA upon request.

6.0 REPORTING REQUIREMENTS

- 6.1. Annual Report** The permittee must submit to LRAPA by **March 1** of each year this permit is in effect, the following information for the preceding calendar year:
- a. A copy of one-month of logs required in Condition 5.1;
 - b. Whether or not they are in compliance with each applicable requirement of this permit;
 - c. Whether all information contained in the statement is accurate and true;
 - d. A summary of air quality related complaints received by the permittee; and

- e. Quantity of perchloroethylene purchased.
- 6.2. **Initial Startup Notice** The permittee must notify LRAPA in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.
- 6.3. **Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using a LRAPA “Permit Application Form” within 60 days after the following:
 - a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 6.4. **Construction or Modification Notices** The permittee must notify LRAPA in writing using a LRAPA “Notice of Construction Form,” or “Permit Application Form,” and obtain approval before:
 - a. Constructing or installing a new dry cleaning system;
 - b. Modifying or altering an existing dry cleaning system that may significantly affect air emissions;
 - c. Making a physical change to a dry cleaning system which increases air emissions; or
 - d. Changing the method of operation of a dry cleaning system.
- 6.5. **Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 7.2.

7.0 ADMINISTRATIVE REQUIREMENTS

- 7.1. **Reassignment to the General ACDP** A complete application for reassignment to this permit is due within 60 days after the permit is reissued. LRAPA will notify the permittee when the permit is reissued.
 - a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is reissued and the source is reassigned to the permit.
 - b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application.

7.2. Permit Coordinator Address All reports, notices, and applications should be directed to LRAPA as follows:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
541-736-1056

7.3. LRAPA's web site Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

8.0 FEES

8.1. Annual Compliance Fee The annual fee specified in LRAPA 37-0020, Table 2, Part 2 for a General ACDP, Fee Class Six, is due on **March 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to this date.

8.2. Change of Ownership or Company Name Fee The non-technical permit modification fee specified in LRAPA 37-0020, Table 2, Part 3.a is due with an application for changing the ownership or the name of the company.

8.3. Where to Submit Fees Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

9.0 GENERAL CONDITIONS AND DISCLAIMERS

9.1. Other Regulations In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

9.2. Conflicting Conditions In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

9.3. Masking of Emissions The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.

9.4. LRAPA Access The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the

purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.

- 9.5. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 9.6. Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 9.7. Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.
- 9.8. Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 9.9. Termination, Revocation, or Modification** LRAPA may modify or revoke this permit pursuant to LRAPA 37-0082 and 37-0084.

10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	Agency
calendar year	The 12-month period beginning January 1st and ending December 31st	MSDS material safety data sheet
CFR	Code of Federal Regulations	NESHAP National Emissions Standards for Hazardous Air Pollutants
DEQ	Oregon Department of Environmental Quality	OAR Oregon Administrative Rules
EPA	US Environmental Protection Agency	ORS Oregon Revised Statutes
HAP	Hazardous Air Pollutant as defined LRAPA Title 44	Pb lead
LRAPA	Lane Regional Air Protection	SIC Standard Industrial Code
		year A period consisting of any 12-consecutive calendar months

Lane Regional Air Protection Agency

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

PERCHLOROETHYLENE DRY CLEANERS

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from perchloroethylene dry cleaners.
2. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.
3. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.
4. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

5. Facilities assigned to this General Permit are sources of perchloroethylene emissions.
6. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of LRAPA Title 12.

SPECIFIC AIR PROGRAM APPLICABILITY

7. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA Title 32, 48, and 49. The permit contains requirements and limitations to ensure compliance with these standards.
8. This permit incorporates the National Emission Standards for Hazardous Air Pollutants

REVOCAION OF ASSIGNMENT

11. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

12. General Air Contaminant Discharge Permits are incorporated into LRAPA Rules and Regulations by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments or may provide oral testimony at a public hearing that will be held at the end of the comment period in different locations throughout the state. Notice of when and where the hearings will be held will be provided at least 30 days in advance of the hearings. LRAPA will review any comments and may modify the permits in response to the comments. The final permits will be issued after approval by the LRAPA Director.

AQGP-006r, dry cleaners 12/29/09
Max 04/28/11