From:	Holtom, Jonathan
To:	Bumar, Rich
Cc:	Costello, Martin
Subject:	FW: AC permits for Dry Cleaning Plant???
Date:	Tuesday, October 30, 2012 4:27:59 PM
Attachments:	0950111-032-AC SOB.docx 0950111-032-AV Draft Proposed Permit.docx

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Rich,

Looks like the dry cleaning plant is also missing from your application. Do you know what the annual consumption of perchloroethylene (PCE) is? Also, is the Columbia T.D. Mach 2 80-80 dry cleaning machine considered a dry-to-dry machine or a transfer machine?

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From: Holtom, Jonathan
Sent: Tuesday, October 30, 2012 1:13 PM
To: Bumar, Rich
Cc: Costello, Martin
Subject: AC permits for Dry Cleaning Plant???

Hi Rich,

Do you happen to have a copy of the older AC permits for the NSA Laundry Dry cleaning facility? I think the most recent one that includes the underlying requirements was issued by the Central district as permit No. 0950111-012-AC on 12/10/97. Tom Cascio processed permit No. 0950111-028-AC on 07/02/07 as a revision to recognize the replacement of the Multimatic Atlas 45 with the current Columbia T.D. Mach 2 80-80 dry cleaning machine and included the statement that "this permit supplements all previously issued AC and AO permits for this emissions unit." I must be missing some other permit reference, though, because the original Title V (005-AV) listed 4 dry cleaning machines, a revised Title V (018-AV) issued

10/6/99 lists 3 dry cleaning machines, and the first Title V renewal (021-AV) effective 01/01/03 lists one dry cleaning machine. The current (expiring) Title V permit only includes the conditions from Tom's AC revision (028-AC), which only includes the requirements from NESHAP Subpart M. Any AC permits you have related to Emissions unit 121 – Dry Cleaning Plant would be very much appreciated.

If you have time and want to start looking over what we have done so far on your renewal, I have attached my working copies of the statement of basis and draft/proposed permit. I re-did sections III.B. and III.C. yesterday based on our conversations last Friday. I'm currently trying to figure out what applicable requirements exist for the dry cleaning plant and Marty is finishing the engine sections by painstakingly pulling the testing, reporting and monitoring requirements out of ZZZZ for your existing non-emergency engines at EPCOT and DISC. We are pushing to have a completed pre-draft permit this week, so if it would be easier for you to wait and look at the draft in its entirety, I would understand. However, given the small number of days left before we need to have a public notice published, your ability to start looking at the first three sections now could save a little time.

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