



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

June 22, 2007

Certified Mail

Sherrie Lehman, Owner
Lehman Cavalon Cleaners and Interiors
1379 West First Street
Springfield, OH 45504

RE: Ohio EPA Premises No. 0812100556
Air Emissions Unit D001

Dear Ms. Lehman:

WARNING LETTER

The Regional Air Pollution Control Agency (RAPCA) conducted an unannounced facility inspection of Lehman Cavalon Cleaners and Interiors, 1379 West First Street in Springfield, Ohio, on June 5, 2007. At the time of this inspection, air emissions unit D001 (Dry Cleaning Facility) was not operating in compliance with the terms and conditions of Permit to Install (PTI) 08-04598 issued on May 13, 2004, and the Permit to Operate (PTO) issued on August 6, 2004, for this air emissions unit.

Specifically, Part II.C.1. of PTI 08-04598 and the PTO require a leak detection and repair program to inspect all dry cleaning equipment for leaks that are obvious from sight, smell, or touch to be conducted. In accordance with 40 CFR Part 63, Subpart M (Maximum Achievable Control Technology (MACT) Standards for Perchloroethylene Dry Cleaners), compliance with this requirement shall be determined through weekly visual inspections of the dry cleaning machine, while in operation. Part II.C.3.d. of PTI 08-04598 and the PTO require records to be maintained which provide the results of all visual inspections, including the dates when the dry cleaning system components are inspected for leaks and the name or location of dry cleaning system components where leaks are detected. At the time of the June 5, 2007 inspection, no records of a leak detection program were being maintained. This is a violation of PTI 08-04598, the PTO for air emissions unit D001, 40 CFR Part 63, Subpart M, Ohio Administrative Code (OAC) rule and Clark County Combined Health District Air Pollution Control Regulations (CCCHDAPCR) section 3745-21-09 (AA), and Ohio Revised Code (ORC) 3704.05.

Part II.C.2. of PTI 08-04598 and the PTO require that the temperature of the air-perchloroethylene (perc) gas-vapor stream on the outlet side of the refrigerated condenser be measured weekly with a temperature sensor. If the outlet temperature is higher than 45 degrees Fahrenheit (7.2 degrees Celsius), adjustments or repairs shall be made to meet that value. Part II.C.3.f. of PTI 08-04598 and the PTO require that the results and dates of all temperature monitoring be recorded. At the time of the RAPCA inspection, no records of temperature monitoring were being maintained. In addition, no operational temperature sensor was observed to measure the air-perc gas-vapor stream on the outlet side of the refrigerated condenser during the inspection. Failing to have an operational temperature sensor and maintaining temperature monitoring records are violations of PTI 08-04598, the PTO for air emissions unit D001, 40 CFR Part 63, Subpart M, and ORC 3704.05.

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Part II.C.3.b. of PTI 08-04598 and the PTO require that the volume of perc purchases be recorded each month from perc purchase receipts. If no perc is purchased during a given month, then zero gallons shall be recorded. Part II.C.3.c. of PTI 08-04598 and the PTO require that records of calculations of the yearly perc consumption (12-month rolling summation), be determined on the first day of every month. At the time of the inspection, no records of monthly or rolling 12-month summations of perc consumption were being kept. Lehman Cavalon Cleaners and Interiors did provide RAPCA with perc purchase receipts from August 2006 through May 2007. Failing to record monthly and rolling 12-month summations of perc consumption is a violation of PTI 08-04598, the PTO issued for air emissions unit D001, 40 CFR Part 63, Subpart M, OAC rule and CCCHDAPCR section 3745-21-09 (AA), and ORC 3704.05.

RAPCA has met with and been in communications with Angie Runyan of Lehman Cavalon Cleaners and Interiors during the past, seeking resolution of these issues. To date, as noted during the June 5, 2007 inspection, this dry cleaning facility continues to operate in violation of federal, state, and local air pollution regulations, resulting in the issuance of this Warning Letter to the facility owner.

At this time, RAPCA is requiring, that within thirty (30) days after receipt of this letter, Lehman Cavalon Cleaners and Interiors come into compliance with all the requirements contained in PTI 08-04598, the PTO issued for air emissions unit D001 on August 6, 2004, 40 CFR Part 63, Subpart M, OAC rule and CCCHDAPCR section 3745-21-09 (AA), and ORC 3704.05. Lehman Cavalon Cleaners and Interiors must also contact RAPCA to schedule an inspection for verification of compliance, within this thirty day time frame. If no response is received from Lehman Cavalon Cleaners and Interiors within thirty days, further enforcement actions will result, including possible civil and/or criminal penalties.

RAPCA anticipates and appreciates your cooperation in this matter. If you have any questions or concerns, feel free to contact me at (937) 225-5923.

Sincerely,

Brandie K. Lehman
Air Pollution Control Specialist

cc: Jefferis Canan RAPCA
 Lisa Holscher USEPA
 Tom Kalman OEPA
 Sherrie Lehman 2737 Woodthrush Road, Springfield, OH 45502

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Sherrie Lehman, Owner
 Lehman Cavalon Cleaners and Interiors
 1379 West First Street
 Springfield, OH 45504

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(Transfer from service label)

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X *Sherrie Duckwall*

- Agent
- Addressee

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SHERIE DUCKWALL

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 Springfield, OH 45504