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Facility Name: **Multi-Service, Inc**

Application Number: **08-3812**

Date: **September 23, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Multi-Service, Inc** located in **Montgomery** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>
D001 (Mod)	Dry cleaning with Petroleum Stoddard Solvent; 3 dry-to-dry machines, washer/extract and solvent reclaimer (** modification)	*	3745-31-05 NSPS 40 CFR Part 60 Subpart JJJ

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				or less is attained.
3745-21-09 (BB) (1) (a) (i)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	Same as NSPS		92 tons/year of volatile organic emissions; as a rolling 12-month summation Stoddard VOC content shall not exceed 6.42 pounds/gallon The dryer shall be operated so that the dryer remains closed and the solvent recovery phase continues until a final recovered solvent flow rate of 0.05 liter/minute

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- * BAT is determined to be in compliance with applicable OAC rules and specified allowable mass emission rates; compliance with NSPS 40 CFR Part 60, Subpart JJJ, recordkeeping and reporting.
- ** This modification represents an increase in allowable volatile organic compound emissions of 44.03 tons/year over that previously authorized by Ohio EPA PTI No. 08-3058. The dry cleaning machine configuration is also modified from the original 6 dry-to-dry machines authorized by Ohio EPA PTI No. 08-3058 to 3 dry-to-dry machines and a washer/extractor with transfer to solvent reclaimer (dryer).

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Compounds	92

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
D001	Dry cleaning with Stoddard Solvent	JJJ

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

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- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Regional Air Pollution Control Agency**
451 West Third Street
Dayton, OH 45422

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control Agency, 451 West Third Street, Dayton, OH 45422.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Regional Air Pollution Control Agency, 451 West Third Street, Dayton, OH 45422.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Equipment & Additional Terms and Conditions

1. The dry cleaning process allowed by this permit is comprised of the following equipment:
 - a. three dry-to-dry cleaning machines;
 - b. one washer/extractor with transfer to one solvent reclaimer;
 - c. one 5,000 gallon waste sludge storage tank;

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- d. three distillation units; and,
 - e. two 13,000 gallon solvent storage tanks.
2. Any equipment associated with the use of petroleum solvent shall be visually inspected weekly to identify liquid leaks of petroleum solvent. [OAC rule 21-09(BB) (1) (d)]
 3. Any liquid or vapor leak of petroleum solvent shall be repaired within fifteen (15) days after identifying the source of the leak, unless a necessary repair part is not on hand. If a repair part is not on hand, it shall be ordered within (3) working days after identifying the source of the leak. The leak shall be repaired within fifteen (15) days following the delivery of the necessary repair part. [OAC 3745-21-09(BB) (1) (e)]

B. Operational Restrictions

1. In accordance with 40 CFR 60.624 and OAC rule 3745-21-09(BB)(1)(a)(i), each solvent recovery dryer shall be operated in a manner such that the dryer remains closed and the solvent recovery phase continues until a final recovered solvent flow rate of 0.05 liter per minute (1.7 ounces per minute) or less is attained.
2. There shall be no open containers with solvent or waste containing solvent. [OAC 3745-21-09(BB)(1)(c)]
3. The maximum annual solvent usage for this emissions unit shall not exceed 28,648 gallons, based upon a rolling, 12-month summation of the solvent usage figures.
4. The petroleum stoddard solvent shall not exceed a VOC content of 6.42 pounds/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. This facility shall retain the leak inspection and leak repair cycle information in the operating manual provided by the manufacturer and shall post said information on a clearly visible label on each dryer. Such

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information should state:

"To protect against fire hazards, loss of valuable solvents, and emissions of solvent to the atmosphere, periodic inspection of this equipment for evidence of leaks and prompt repair of any leaks is recommended. The USEPA recommends that the equipment be inspected every fifteen (15) days, and all vapor or liquid leaks be repaired within the subsequent fifteen (15) day period." (40 CFR 60.622)

2. This facility shall maintain a record of the performance test. (40 CFR 60.625)
3. This facility shall maintain records of inspections and maintenance.
4. This facility shall maintain records of solvent usage. At least once per month, Multi-Service shall read and record the solvent level on each storage tank. Multi-Service shall also record the date and amount of solvent added to the 13,000 gallon tanks from outside the dry cleaning system, as well as its VOC content.
5. This facility shall install, operate and maintain equipment (gauge or other device) for each storage tank (each 13,000 gallon solvent tank and each dry cleaning machine solvent tank) that indicates the amount of solvent in each tank at any time.
6. The facility shall maintain records of the Stoddard VOC content. Each solvent shipment added to the tanks shall be checked for VOC content and recorded.

D. Reporting Requirements

1. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Regional Air Pollution Control Agency; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations,

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operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit

for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit semi-annual reports to RAPCA summarizing the monthly solvent usage amounts determined according to (E)(1). These reports shall include VOC content records maintained for the solvent.

E. Compliance Determination and Testing Requirements

1. Compliance with the usage limitations on petroleum solvent shall be determined once per month from facility records by way of the procedure outlined in the following paragraphs:

The amount of solvent used for the time period is equal to the combined difference between the storage tank readings and the amount of solvent added to the 13,000 gallon tanks.

The amount of solvent removed from the system in the distillation waste may be subtracted from the total provided the waste has been tested in accordance with the procedures approved by the Ohio EPA and RAPCA.

2. Compliance with the emission limitation(s) stated in this Permit to Install shall be determined in accordance with the following methods:

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a. Emission Limitation

0.05 liter/minute solvent flow rate or less

Applicable Compliance Method

Compliance shall be based on testing in accordance with paragraph (N) of OAC rule 3745-21-10 and 40 CFR 60.624.

b. Emission Limitation

92 tons VOC/yr

Applicable Compliance Method

Compliance shall be determined by multiplying the VOC content of the petroleum stoddard solvent, 6.42 lbs/gallon, by each 12-month summation of the petroleum stoddard solvent usage (gallons), and dividing by 2,000 lbs/ton.