



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY  
Application No: 08-4081**

**CERTIFIED MAIL**

**DATE: December 22, 1999**

DSS, Inc.  
Steve Will  
7476 Webster Street  
Dayton, OH 45414

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.



The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA  
REGIONAL AIR POLLUTION CONTROL AGENCY  
Kentucky Department of Natural Resources & Environmental Protection Miami Valley Regional Planning Commission  
Indiana Office of Air Management

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

---

**Terms and  
Conditions**

---

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 08-4081**

Application Number: 08-4081  
APS Premise Number: 0857043191  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: DSS, Inc.  
Person to Contact: Steve Will  
Address: 7476 Webster Street  
Dayton, OH 45414

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**7476 Webster Street  
Dayton, Ohio**

Description of proposed emissions unit(s):  
**4 SOLVENT SOAK TANKS AND 12 GROUPS OF INDIVIDUAL SOLVENT CLEANING STATIONS.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

\_\_\_\_\_  
Director

DSS, Inc.

Facility ID: 0857043191

PTI Application: 08-4081

Date: To be entered upon final issuance

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

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 appropriate Ohio EPA District Office or local air agency.
- 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, 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 appropriate Ohio EPA District Office or local air 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.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

DSS, Inc.

Facility ID: 0857043191

PTI Application: 08-4081

**Date: To be entered upon final issuance**

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection

DSS, Inc.

Facility ID: 0857043191

PTI Application: 08-4081

**Date: To be entered upon final issuance**

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 emissions unit(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 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 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 prove to be inadequate or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. 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.

**13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after

DSS, Inc.

Facility ID: 0857043191

PTI Application: 08-4081

Date: To be entered upon final issuance

commencing operation of the emissions unit(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	14.6

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Four (4) solvent soak tanks	OAC rule 3745-35-07(B)	See A.2.a. and B.1.
	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr, 40 lbs/day, and 7.3 TPY organic compounds  Compliance with the air toxic policy.
	OAC rule 3745-21-07 (G)(2)	As stringent as the emission limitations above.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

- 1. The maximum xylene solvent usage for P001 and P002 shall not exceed 3235 gallons based on a rolling, 12-month summation.
- 2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following xylene solvent gallon usage for P001 and P002 combined:

Months	Maximum, Cumulative Total Gallon Usage
1	270

**Date: To be entered upon final issuance**

1-2	540
1-3	810
1-4	1080
1-5	1350
1-6	1620
1-7	1890
1-8	2160
1-9	2430
1-10	2700
1-11	2970
1-12	3235

After the first 12 calendar months of operation following the effective date of this permit, the permittee shall comply with the annual gallon limitation based upon rolling 12-month summations.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information daily for the soak tank operation:
  - a. the company identification for each solvent material employed;
  - b. the number of gallons of each solvent material employed;
  - c. the organic compound content of each solvent material, in pounds per gallon;
  - d. the total organic compound emission rate for all solvent materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and,
  - f. the average hourly organic compound emission rate for all solvent materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification of each solvent material employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each solvent material, in pounds per gallon, as employed;

**DSS, Inc.**PTI Application: **no 1001****Date:**Facility ID: **0857043191**Emissions Unit ID: **P001**

- c. the total combined HAP content of each solvent material, in pounds per combined HAPs per gallon, as employed;
  - d. the number of gallons of each solvent material employed;
  - e. the total individual HAP emissions for each HAP from all solvent materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each solvent material);
  - f. the total combined HAP emissions from all solvent materials, in pounds or tons per month (the sum of (c) times (d) for each solvent material);
  - g. the rolling, 12-month summation of the total individual HAP emissions for each HAP from all solvent materials employed, in tons per year; and,
  - h. the rolling, 12-month summation for the total combined HAP emissions from all solvent materials employed, in tons per year.
3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and,
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with the general terms and conditions Section A.2. which identify all exceedances of:
  - a. each day during which the average hourly organic compound emissions from the solvent materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
  - b. each day during which the organic compound emissions from the solvent materials exceeded 40 pounds per day, and the actual organic compound emissions for each such

**Date: To be entered upon final issuance**

- day;
- c. the rolling, 12-month, usage limitation;
  - d. the rolling, 12-month, individual HAP limitation;
  - e. the rolling, 12-month, combined HAP limitation; and,
  - f. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative xylene solvent material usage levels.
2. The permittee shall also submit annual reports which specify the individual HAP emission from the facility, the combined HAPs emissions from the facility, the total OC emissions from this emissions unit, and the total gallons of solvent materials employed in this emissions unit. These reports shall be submitted by January 31 of each year.

**Date: To be entered upon final issuance**

### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
8.0 lbs OC/hr  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.
  - b. Emission Limitation -  
40.0 lbs OC/day  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.
  - c. Emission Limitation -  
7.3 TPY organic compounds  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year.
  - d. Emission Limitation -  
Less than 10 TPY for any individual HAP and 25 TPY for any combination of HAPs, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.2.

### **F. Miscellaneous Requirements**

#### Air Toxic Policy Clarifying Language (P001 and P002)

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic

12

**DSS, I**

PTI A<sub>1</sub>

Emissions Unit ID: **P001**

**Date: To be entered upon final issuance**

Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the

**DSS, Inc.**PTI Application: **no 1001****Date:**Facility ID: **0857043191**Emissions Unit ID: **P001**

emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" each pollutant(s):

Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 12.04

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1214

MAGLC (ug/m3): 10,333.33

Pollutant: ethylbenzene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 2.12

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 183.8

MAGLC (ug/m3): 10,333.33

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 1.84

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 215.7

DSS, Inc.

PTI Application: 00 1001

Date:

Facility ID: 0857043191

Emissions Unit ID: P001

MAGLC (ug/m3): 23,404.76

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

15

**DSS, I**

PTI A<sub>1</sub>

**Date: To be entered upon final issuance**

Emissions Unit ID: **P001**

Date: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Twelve (12) groups of individual solvent stations	OAC rule 3745-35-07(D)  OAC rule 3745-31-05  OAC rule 3745-21-07 (G)(2)	See A.2.a. and B.1.  8.0 lbs/hr, 40 lbs/day, and 7.3 TPY organic compounds  Compliance with the air toxic policy  As stringent as the emission limitations above.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

1. The maximum xylene solvent usage for P001 and P002 shall not exceed 3235 gallons based on a rolling, 12-month summation.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following xylene solvent gallon usage for P001 and P002 combined:

**DSS, Inc.**PTI Application: **00 1001****Date:**Facility ID: **0857043191**Emissions Unit ID: **P002**

Months	Maximum, Cumulative Total Gallon Usage
1	270
1-2	540
1-3	810
1-4	1080
1-5	1350
1-6	1620
1-7	1890
1-8	2160
1-9	2430
1-10	2700
1-11	2970
1-12	3235

After the first 12 calendar months of operation following the effective date of this permit, the permittee shall comply with the annual gallon limitation based upon rolling 12-month summations.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information daily for the 12 groups of individual solvent stations:
  - a. the company identification for each solvent material employed;
  - b. the number of gallons of each solvent material employed;
  - c. the organic compound content of each solvent material, in pounds per gallon;
  - d. the total organic compound emission rate for all solvent materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and,
  - f. the average hourly organic compound emission rate for all solvent materials, i.e., (d)/(e), in pounds per hour (average).
  
2. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification of each solvent material employed;

**Date: To be entered upon final issuance**

- b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each solvent material, in pounds per gallon, as employed;
  - c. the total combined HAP content of each solvent material, in pounds per combined HAPs per gallon, as employed;
  - d. the number of gallons of each solvent material employed;
  - e. the total individual HAP emissions for each HAP from all solvent materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each solvent material);
  - f. the total combined HAP emissions from all solvent materials, in pounds or tons per month (the sum of (c) times (d) for each solvent material);
  - g. the rolling, 12-month summation of the total individual HAP emissions for each HAP from all solvent materials employed, in tons per year; and,
  - h. the rolling, 12-month summation for the total combined HAP emissions from all solvent materials employed, in tons per year.
3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
    - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and,
    - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with the general terms and conditions Section A.2. which identify all exceedances of:
  - a. each day during which the average hourly organic compound emissions from the

**Date: To be entered upon final issuance**

solvent materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

- b. each day during which the organic compound emissions from the solvent materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
- c. the rolling, 12-month, usage limitation;
- d. the rolling, 12-month, individual HAP limitation;
- e. the rolling, 12-month, combined HAP limitation; and,
- f. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative solvent material usage levels.

**DSS, Inc.**PTI Application: **no 1001****Date:**Facility ID: **0857043191**Emissions Unit ID: **P002**

2. The permittee shall also submit annual reports which specify the individual HAP emission from the facility, the combined HAPs emissions from the facility, the total OC emissions from this emissions unit, and the total gallons of solvent materials employed in this emissions unit. These reports shall be submitted by January 31 of each year.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
8.0 lbs OC/hr  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.
  - b. Emission Limitation -  
40.0 lbs OC/day  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1.
  - c. Emission Limitation -  
7.3 TPY organic compounds  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year.
  - d. Emission Limitation -  
Less than 10 TPY for any individual HAP and 25 TPY for any combination of HAPs, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in Section C.2.

## **F. Miscellaneous Requirements**

Air Toxic Policy Clarifying Language (P001 and P002)

**Date: To be entered upon final issuance**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: xylene

TLV (ug/m<sup>3</sup>): 434,000

Maximum Hourly Emission Rate (lbs/hr): 12.04

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1214

MAGLC (ug/m<sup>3</sup>): 10,333.33

Pollutant: ethylbenzene

TLV (ug/m<sup>3</sup>): 434,000

Maximum Hourly Emission Rate (lbs/hr): 2.12

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 183.8

MAGLC (ug/m<sup>3</sup>): 10,333.33

Pollutant: isopropyl alcohol

TLV (ug/m<sup>3</sup>): 983,000

**Date: To be entered upon final issuance**

Maximum Hourly Emission Rate (lbs/hr): 1.84

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 215.7

MAGLC (ug/m<sup>3</sup>): 23,404.76

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the

**DSS, Inc.**

PTI Application: **00 1001**

**Date:**

Facility ID: **0857043191**

Emissions Unit ID: **P002**

application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.