

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **08-04675**

**A. Source Description**

Multi-Service, an industrial dry cleaning facility which uses petroleum solvent, is located in Montgomery County. Multi-Service is proposing a modification to its existing air permit-to-install (PTI) and wants to limit the volatile organic compound (VOC) emissions to less than 100 ton per year (TPY) of VOC. Therefore, through the limitations on the petroleum solvent usage, they will be a synthetic minor facility and avoid Title V permitting and the major non-attainment new source review (NSR) provisions.

**B. Facility Emissions and Attainment Status**

Multi-Service is currently classified as a minor stationary source pursuant to Title V operating permit requirements and major new source review (NSR) for VOC. Montgomery County is currently designated as non-attainment for ozone.

**C. Source Emissions**

Potential emissions of VOC from this facility, which has only one emissions unit, without any federally enforceable restrictions is 181.3 tons per year. Limiting the annual petroleum solvent usage in emissions unit D002 will limit the VOC emissions to 99.0 tons per rolling, 12-month summation. Therefore the allowable emissions of VOC from this facility is 99.0 tons per year.

**D. Conclusion**

Multi-Service will become a synthetic minor facility by means of limiting the annual petroleum solvent usage effectively restricting the facility potential to emit (PTE) for VOC to below major non-attainment NSR or Title V operating permit threshold levels. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for emissions unit D002, will be required to monitor compliance. The maximum petroleum solvent usage for emissions unit D002 will be limited to 30,841 gallons, as a rolling 12-month summation and a VOC content of 6.42 lbs of VOC/gallon. Therefore, through federally enforceable terms and conditions and record keeping requirements, Multi-Service will not trigger the Title V permitting requirements or major non-attainment NSR.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No:** 08-04675

**Fac ID:** 0857043034

**DATE:** 4/5/2005

Multi-Service Inc.  
Mel Tatman  
1962 Radio Rd  
Dayton, OH 45431-1097

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 **\$200** 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.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

KY

IN

**MONTGOMERY COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04675 FOR AN AIR CONTAMINANT SOURCE FOR  
Multi-Service Inc.**

On 4/5/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Multi-Service Inc.**, located at **1962 Radio Rd, Dayton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04675:

**chapter 31 modification replacing 08-04463 issued 1/14/03 to increase allowable vocs and upgrade from non TV to SMTV.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280  
[(937)225-4435]



**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 08-04675**

Application Number: 08-04675  
Facility ID: 0857043034  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Multi-Service Inc.  
Person to Contact: Mel Tatman  
Address: 1962 Radio Rd  
Dayton, OH 45431-1097

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1962 Radio Rd  
Dayton, Ohio**

Description of proposed emissions unit(s):  
**Chapter 31 modification replacing 08-04463 issued 1/14/03 to increase allowable vocs and upgrade from non TV to SMTV.**

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

**Multi-Service Inc.**

**Facility ID: 0857043034**

**PTI Application: 08-04675**

**Issued: 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**

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 representative of the Director, upon receipt of a written request and within a reasonable time, any

**Multi-Service Inc.**

**Facility ID: 0857043034**

**PTI Application: 08-04675**

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

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 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

**Multi-Service Inc.**

**Facility ID: 0857043034**

**PTI Application: 08-04675**

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

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**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

**Multi-Service Inc.**

**Facility ID: 0857043034**

**PTI Application: 08-04675**

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

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**Multi-Service Inc.**

**Facility ID: 0857043034**

**PTI Application: 08-04675**

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

**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>
VOC	99.0

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

**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>
D002 - Petroleum Solvent Dry Cleaning Operations: 6 Hoyt Petromiser Dryers, 4 Midwest Washers and 2 Distillation Recovery Stills	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of NSPS 40 CFR Part 60, Subpart JJJ, OAC rule 3745-21-09(BB)(a)(i), OAC rule 3745-31-05(C) and OAC rule 3745-35-07(B).
*modification	NSPS 40 CFR Part 60, Subpart JJJ and OAC rule 3745-21-09(BB)(a)(i)	See A.2.a.
	OAC rule 3745-31-05(C) and OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment and Title V permitting requirements)	The VOC emission rate from this emissions unit shall not exceed 99.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

**2. Additional Terms and Conditions**

- 2.a The dryer is a solvent recovery dryer which is 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 liters per minute (1.7 ounces per minute) or less is attained.

**B. Operational Restrictions**

1. The VOC content of the petroleum solvent shall not exceed 6.42 pound of VOC per gallon.

**Multi-Service Inc.**

**PTI Application: 08 04675**

**Issued**

**Facility ID: 0857043034**

**Emissions Unit ID: D002**

2. The maximum annual petroleum solvent usage for this emissions unit shall not exceed 30,841 gallons, based upon a rolling, 12-month summation of the petroleum solvent usage figures. Since this is an existing source, there are existing records and therefore the usage of petroleum solvent, in the first twelve months does not need to be established.
3. The total allowable emissions of VOC from this emissions unit D002 shall not exceed 99.0 tons, per rolling, 12-month summation.
4. Any solvent filter for petroleum solvent shall comply with the following requirements:
  - a. The solvent filter is a cartridge filter which is drained for at least eight hours in its sealed housing before removal of any cartridge; or
  - b. The filtration waste contains, before disposal and exposure to the ambient air; no more than 1.0 pound of VOC per one hundred pounds dry weight of articles cleaned, as determined under paragraph (M) of rule 3745-21-10 of the Administrative Code.
5. Any bucket or barrel which contains petroleum solvent or petroleum solvent-laden waste shall be covered to minimize solvent evaporation.
6. Any equipment associated with the use of petroleum solvent shall be visually inspected weekly to identify liquid leaks of petroleum solvent.
7. 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 three (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.

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

1. The permittee shall maintain records of the results of any test [OAC rule 3745-21-10(N)] performed and any measurements taken to determine compliance with the limitation specified in A.2.a.
2. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:
  - a. Date of inspection.
  - b. Findings (may indicate no leaks discovered or location, nature, and severity of each leak).
  - c. Leak determination method.

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

- d. Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days).
  - e. Inspector's name and signature.
3. 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 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)

4. The permittee shall maintain a log of the following records:
- a. Receipts of all petroleum solvent purchases.
  - b. The VOC content of each petroleum solvent employed.
  - c. The volume of petroleum solvent purchased each month in gallons, as recorded from petroleum solvent purchases. If no petroleum solvent is purchased during a given month, then the entry in the log shall be zero gallons.
  - d. The volume of petroleum solvent in the tanks in gallons at the beginning of each month (starting inventory).
  - e. The volume of petroleum solvent added to the system in gallons each month.
  - f. The volume of petroleum solvent in the tanks in gallons at the end of each month (ending inventory).
  - g. The volume of petroleum solvent sent off-site as waste in gallons.
  - h. The calculation and result of the yearly petroleum solvent consumption in gallons, (as a rolling, 12-month summation), to be determined on the first day of each month  $d + e - f - g$ ).
  - i. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e.,  $(h \times b)$

divided by 2000 lbs/ton.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month petroleum solvent usage limitation, in gallons and the actual rolling, 12-month petroleum solvent usage summation, in gallons, for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month VOC emissions limitation, and the actual rolling, 12-month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
4. The permittee shall submit deviation (excursion) reports that identify any test result that shows an exceedance of the limitation specified in A.2.a. of this permit. The deviation (excursion) report shall be submitted to the Director (appropriate DO or LAA) within 30 days after the occurrence.
5. The permittee shall submit deviation (excursion) reports that identify any leaks in vapor or liquid lines that are not repaired within 15 days after identification. The deviation (excursion) report shall be submitted to the Director (appropriate DO or LAA) within 30 days after the repair is completed.
6. The permittee shall submit annual reports which specify the actual total VOC emissions from this emissions unit for the previous calendar year. 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 -  
99.0 tons VOC/year, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based on record keeping as specified in Section C.4.i. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.
  - b. Emission Limitation-  
30,841 gallons, based upon a rolling, 12-month summation

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

Applicable Compliance Method -

Compliance shall be based on record keeping as specified in Section C.4.h.

- c. Emission Limitation-  
final recovered solvent flow rate of 0.05 liters per minute (1.7 ounces per minute) or less

Applicable Compliance Method-

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

**Multi-  
PTI A**

Emissions Unit ID: **D002**

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

**F. Miscellaneous Requirements**

1. \*Terms in this permit supercede those identified in PTI 08-04463 issued 01/14/03 and represent a 21.96 tons VOC/yr increase of emissions.
2. The terms and conditions contain in Sections A, B, C, D, and E are federally enforceable.