



Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

July 15, 2003

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: **ARAMARK Uniform and Career Apparel, Inc. 141-17364-00132**

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4 (d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (b) the interest of the person making the request;
- (c) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

REGIS.wpd 8/21/02

July 15, 2003

Mr. Jim Robinson  
ARAMARK Uniform and Career Apparel, Inc.  
3701 Progress Drive  
South Bend, Indiana 46619

Re: Registered Construction and Operation Status,  
141-17364-00132

Dear Mr. Robinson:

The application from ARAMARK Uniform and Career Apparel, Inc., located at 3701 Progress Drive, South Bend, Indiana 46619 received on June 4, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following industrial laundry operation, is classified as registered:

- (a) One (1) natural gas-fired boiler, with a heat input capacity of 29.1 million British thermal units per hour (mmBtu/hr);
- (b) Four (4) natural gas-fired dryers, identified as #1, #2 #6, and #7 each with a heat input capacity of 2.75 mmBtu/hr;
- (c) Two (2) natural gas-fired dryers, identified as #3 and #4 each with a heat input capacity of 2.5 mmBtu/hr;
- (d) One (1) natural gas-fired dryer, identified as #5 with a heat input capacity of 2.9 mmBtu/hr;
- (e) One (1) natural gas-fired dryer, identified as #8 with a heat input capacity of 0.25 mmBtu/hr;
- (f) One (1) natural gas-fired dryer, identified as #9 with a heat input capacity of 0.37 mmBtu/hr;
- (g) Two (2) steam tunnel, one is identified as #1 with a heat input capacity of 0.75 mmBtu/ hour and the other is identified as #2, with a heat input capacity of 0.50 mmBtu/ hour, and
- (h) One (1) 2.9 MMBtu/hr natural gas fired dryer, identified as Dryer #10, with emissions exhausted through Stack 13.

The following conditions shall be applicable:

1. Opacity Limitations [326 IAC 5-1-2]

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

2. Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by the department each year by April 15 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

St. Joseph Local Agency  
St. Joseph County Health Department, Rm 914  
County-City Building  
South Bend, Indiana 46601

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, St. Joseph County Health Department on or before the date it is due.

3. Particulate Matter Emissions (PM) Limitations for Sources of Indirect Heating [326 IAC 6-2]

Pursuant 326 IAC 6-2-3, the PM emissions from the 29.1 mmBtu/hr boiler shall be limited to 0.8 pound per million British thermal unit (lb/mmBtu) heat input .

This registration is the second air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section  
Office of Air Quality  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

SDF

cc: File - St. Joseph County  
St. Joseph County Health Department  
Air Compliance - Rick Reynolds  
Northern Regional Office  
Permit Tracking - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

## Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

<b>Company Name:</b>	<b>ARAMARK Uniform and Career Apparel, Inc.</b>
<b>Address:</b>	<b>3701 Progress Drive</b>
<b>City:</b>	<b>South Bend</b>
<b>Authorized individual:</b>	<b>Jim Robinson</b>
<b>Phone #:</b>	<b>(219) 234-1045</b>
<b>Registration #:</b>	<b>141-17364-00132</b>

I hereby certify that **ARAMARK Uniform and Career Apparel, Inc.** is still in operation and is in compliance with the requirements of **Registration 141-17364-00132.**

<b>Name (typed):</b>	
<b>Title:</b>	
<b>Signature:</b>	
<b>Date:</b>	

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Notice Only Change to a Registration

#### Source Background and Description

Source Name: ARAMARK Uniform and Career Apparel, Inc.  
Source Location: 3701 Progressive Drive, South Bend, Indiana 46619  
County: St. Joseph  
SIC Code: 7218  
Registration No.: 141-15502-00132  
Date Issued: May 13, 2002  
Notice Only Change No.: 141-17364-00132  
Permit Reviewer: SDF

The Office of Air Quality (OAQ) has reviewed an application from ARAMARK Uniform and Career Apparel, Inc. relating to the operation of their stationary industrial laundry operation.

#### Request

On June 4, 2003, ARAMARK Uniform and Career Apparel, Inc. submitted a request to add one (1) 2.9 MMBtu/hr natural gas fired dryer, identified as Dryer #10, with emissions exhausted through Stack 13.

The addition of the proposed dryer will not cause any increases in production or emissions from the existing emission units.

Therefore, the emissions generated by the proposed modification are the proposed dryer natural gas combustion emissions.

Based on the emission estimates performed, the PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO, single HAP, and combined HAP unrestricted potential to emit (UPTE) are estimated to be 0.02, 0.10, 0.01, 1.27, 0.07, 1.07, 0.02, and 0.02 tons/yr, respectively.

After the proposed modification, the PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO, single HAP, and combined HAP UPTE are estimated to be 0.42, 1.80, 0.21, 23.07, 1.27, 19.37, 0.02, and 0.02 tons/yr, which are less than their respective 326 IAC 2-6.1 Minor Source Operating Permit (MSOP) applicable levels of 25, 25, 25, 25, 100, 10, and 25 tons per year.

Therefore, the source after the proposed modification is still a source that can be permitted under a Registration pursuant to 326 IAC 2-5.5.

In addition, there are no new applicable requirements or changes to any existing permit conditions that are necessary due to the proposed modification.

Therefore, the proposed dryer shall be incorporated into the existing source Registration via a Notice Only Change pursuant to 326 IAC 2-5.5-6(d)(2) which states that minor administrative changes such as a change in descriptive information concerning the source emission units, may be incorporated into an existing Registration via a Notice Only Change.

**Existing Approvals**

The source has been operating under Registration 141-15502-00132, issued on May 13, 2002.

**Recommendation**

The staff recommends to the Commissioner that the Notice Only Change be approved. This recommendation is based on the following facts and conditions. Unless otherwise stated, information used in this review was derived from the application.

**Emission Calculations**

The emissions generated by the proposed modification are the proposed dryer natural gas combustion emissions.

**(1) Unrestricted Potential to Emit (UPTE):**

The following calculations determine the natural gas combustion emissions based on a maximum capacity of 2.9 MMBtu/hr, natural gas combustion, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$\text{Tons/yr} = \text{MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ MMcf}/1000 \text{ MMBtu} * \text{Ef lb/MMcf} * 1/2000 \text{ ton/lb}$$

**(a) Criteria Pollutant Emissions:**

	PM	PM10	SO2	NOx	VOC	CO
Ef (lb/MMcf)	1.9	7.6	0.6	100.0	5.5	84.0
<b>tons/yr</b>	<b>0.02</b>	<b>0.10</b>	<b>0.01</b>	<b>1.27</b>	<b>0.07</b>	<b>1.07</b>

**(b) Hazardous Air Pollutant Emissions:**

HAP	Ef	tons/yr
Benzene	2.1 E-3	2.667 E-5
Dichlorobenzene	1.2 E-3	1.524 E-5
Formaldehyde	7.5 E-2	9.527 E-4
<b>Hexane</b>	<b>1.8</b>	<b>0.02</b>
Toluene	3.4 E-3	4.319 E-5
Lead	5.0 E-4	6.351 E-6
Cadmium	1.1 E-3	1.397 E-5
Chromium	1.4 E-3	1.778 E-5
Manganese	3.8 E-4	4.827 E-6
Nickel	2.1 E-3	2.667 E-5
<b>Total</b>		<b>0.02</b>

## (2) Emissions After Controls:

All applicable emissions are uncontrolled.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.02
PM-10	0.10
SO <sub>2</sub>	0.01
VOC	0.07
CO	1.07
NO <sub>x</sub>	1.27

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Combined HAPs	0.02

After the proposed modification, the PM, PM10, SO2, NOx, VOC, CO, single HAP, and combined HAP UPTe are estimated to be 0.42, 1.80, 0.21, 23.07, 1.27, 19.37, 0.02, and 0.02 tons/yr, which are less than their respective 326 IAC 2-6.1 Minor Source Operating Permit (MSOP) applicable levels of 25, 25, 25, 25, 100, 10, and 25 tons per year.

Therefore, the source after the proposed modification is still a source that can be permitted under a Registration pursuant to 326 IAC 2-5.5.

In addition, there are no new applicable requirements or changes to any existing permit conditions that are necessary due to the proposed modification.

Therefore, the proposed dryer shall be incorporated into the existing source Registration via a Notice Only Change pursuant to 326 IAC 2-5.5-6(d)(2) which states that minor administrative changes such as a change in descriptive information concerning the source emission units, may be incorporated into an existing Registration via a Notice Only Change.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Existing Source Status**

Existing Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document (TSD) of Registration 141-15502-00132, issued on June 4, 2003:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	0.40	1.70	0.20	21.80	1.20	18.30	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The existing source is not a major PSD stationary source because no criteria pollutant emissions are greater than the applicable level or 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source is not a Part 70 major stationary source because no criteria pollutants exceed the applicable level of 100 tons per year and the single and combined HAP emissions are less than the respective applicable levels of 10 and 25 tons per year.

**Source After the Proposed Modification**

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
existing source	0.40	1.70	0.20	21.80	1.20	18.30	neg.	neg.
Modification	0.02	0.10	0.01	1.27	0.07	1.07	0.02	0.02
<b>tons/yr</b>	<b>0.42</b>	<b>1.80</b>	<b>0.21</b>	<b>23.07</b>	<b>1.27</b>	<b>19.37</b>	<b>0.02</b>	<b>0.02</b>

MSOP Levels	25	25	25	25	25	100	10	25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

(a) After the proposed modification, the PM, PM10, SO2, NOx, VOC, CO, single HAP, and combined HAP UPTe are estimated to be 0.42, 1.80, 0.21, 23.07, 1.27, 19.37, 0.02, and 0.02 tons/yr, which are less than their respective 326 IAC 2-6.1 Minor Source Operating Permit (MSOP) applicable levels of 25, 25, 25, 25, 25, 100, 10, and 25 tons per year.

Therefore, the source after the proposed modification is still a source that can be permitted under a Registration pursuant to 326 IAC 2-5.5.

- (b) The source after the proposed modification is still not a major PSD stationary source because no criteria pollutant emissions are greater than the applicable level or 250 tons per year or more and it is not one of the 28 listed source categories.
- (c) This source after the proposed modification is still not a Part 70 major stationary source because no criteria pollutants exceed the applicable level of 100 tons per year and the single and combined HAP emissions are less than the respective applicable levels of 10 and 25 tons per year.

**Federal Rule Applicability**

**(a) New Source Performance Standards (NSPS):**

40 CFR § 60.40c, Subpart Dc still does not apply to the existing 29.1 MMBtu/hr boiler. The proposed dryer will not affect the status of these requirements.

**(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):**

40 CFR § 60.320, Subpart M - National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities still does not apply to the existing industrial laundry operation or the proposed dryer because the associated equipment does not involve dry cleaning.

## State Rule Applicability

### (a) Entire State Rule Applicability:

#### (1) 326 IAC 2-6 (Emission Reporting):

The emission reporting requirements of 326 IAC 2-6 still apply because the source NOx emissions (23.07 tons/yr) are still greater than the St. Joseph County applicable level of 10 tons per year.

#### (2) 326 IAC 5-1 (Visible Opacity Limitations):

The requirements of 326 IAC 5-1 still apply. The proposed dryer will not affect the status of these requirements.

### (b) Individual Unit State Rules, Proposed Dryer:

#### 326 IAC 6-2 (PM Emission Limitations for Sources of Indirect Heating):

The requirements of 326 IAC 6-2 do not apply to the proposed dryer because the proposed dryer is not a source of indirect heating.

## Changes to the Permit

The following lists the changes to the existing Registration that are necessary to incorporate the proposed dryer. All added language indicated in bold type. All deleted information is struck-out.

### Registration Unit Description:

The unit description of the Registration shall be changed as follows to add the proposed dryer.

The application from ARAMARK Uniform and Career Apparel, Inc., located at 3701 Progress Drive, South Bend, Indiana 46619 received on April 11, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following industrial laundry operation, is classified as registered:

- (a) One (1) natural gas-fired boiler, with a heat input capacity of 29.1 million British thermal units per hour (mmBtu/hr);  
.....
- (f) One (1) natural gas-fired dryer, identified as #9 with a heat input capacity of 0.37 mmBtu/hr; ~~and~~
- (g) Two (2) steam tunnel, one is identified as #1 with a heat input capacity of 0.75 mmBtu/ hour and the other is identified as #2, with a heat input capacity of 0.50 mmBtu/ hour-, **and**
- (h) One (1) 2.9 MMBtu/hr natural gas fired dryer, identified as Dryer #10, with emissions exhausted through Stack 13.

## **Conclusion**

The proposed dryer shall be constructed and operated according to the provisions of the existing Registration and First Notice Only Change 141-17364-00132.