



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: July 25, 2012

RE: Hospital Laundry Service, Inc. / 003-32058-00391

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - 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 requires 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, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar 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;
- (2) the interest of the person making the request;
- (3) 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 considerations 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.

Enclosures
FN-REGIS.dot 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

Hospital Laundry Service, Inc.
3322 Cavalier Dr.
Fort Wayne, IN 46808

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R003-32058-00391	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 25, 2012

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary commercial laundry operation.

Source Address:	3322 Cavalier Dr., Fort Wayne, IN 46808
SIC Code:	7213 (Linen Supply)
County Location:	Allen County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) natural gas-fired boilers, identified as CLEBOI 001 and 002, constructed in 1993, each with a maximum capacity of 8.37 MMBtu per hour.
- (b) Four (4) natural gas-fired Milnor dryers, identified as MILDRY 001 through 004, constructed in 1993, each with a maximum capacity of 1.40 MMBtu per hour.
- (c) Six (6) natural gas-fired Milnor dryers, identified as MILDRY 005 through 0010, constructed in 2012, each with a maximum capacity of 1.80 MMBtu per hour.
- (d) Two (2) natural gas-fired Challenge dryers, identified as CHADRY 001 and 002, constructed in 1993, each with a maximum capacity of 2.50 MMBtu per hour.
- (e) Eleven (11) natural gas-fired space heaters, identified as TRAFUR001, TRAFUR003, TRAFUR005 through TRAFUR 0011, REZFUR 001, and REZFUR 002, constructed in 1993, with a maximum combined capacity of 1.12 MMBtu per hour.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R003-32058-00391 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, IN 46204-2251

- (c) The notification 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 on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), 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.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Two (2) natural gas-fired boilers, identified as CLEBOI 001 and 002, constructed in 1993, each with a maximum capacity of 8.37 MMBtu per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the natural gas-fired boilers shall not exceed 0.52 pounds per million British thermal units (lb/MMBtu) heat input. The pound per hour limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Hospital Laundry Service, Inc.
Address:	3322 Cavalier Dr.
City:	Fort Wayne, IN 46808
Phone Number:	260-482-3540
Registration No.:	R003-32058-00391

I hereby certify that Hospital Laundry Service, Inc. is :

- still in operation.
- no longer in operation.

I hereby certify that Hospital Laundry Service, Inc. is :

- in compliance with the requirements of Registration No. R003-32058-00391.
- not in compliance with the requirements of Registration No. R003-32058-00391.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Registration

Source Description and Location
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Source Name:	Hospital Laundry Service, Inc.
Source Location:	3322 Cavalier Dr., Fort Wayne, IN 46808
County:	Allen
SIC Code:	7213 (Linen Supply)
Registration (or Exemption) No.:	R003-32058-00391
Permit Reviewer:	Brian Wright

On June 28, 2012, the Office of Air Quality (OAQ) received an application from Hospital Laundry Service, Inc. related to the construction and operation of new emission units and the continued operation of an existing stationary commercial laundry operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Allen County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Allen County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants
Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Hospital Laundry Service, Inc. on June 28, 2012, relating to the construction and operation of new emission units and the continued operation of an existing stationary commercial laundry operation.

The source consists of the following existing unpermitted emission units:

- (a) Two (2) natural gas-fired boilers, identified as CLEBOI 001 and 002, constructed in 1993, each with a maximum capacity of 8.37 MMBtu per hour.
- (b) Four (4) natural gas-fired Milnor dryers, identified as MILDRY 001 through 004, constructed in 1993, each with a maximum capacity of 1.40 MMBtu per hour.
- (c) Six (6) natural gas-fired Milnor dryers, identified as MILDRY 005 through 0010, constructed in 2012, each with a maximum capacity of 1.80 MMBtu per hour.
- (d) Two (2) natural gas-fired Challenge dryers, identified as CHADRY 001 and 002, constructed in 1993, each with a maximum capacity of 2.50 MMBtu per hour.
- (e) Eleven (11) natural gas-fired space heaters, identified as TRAFUR001, TRAFUR003, TRAFUR005 through TRAFUR 0011, REZFUR 001, and REZFUR 002, constructed in 1993, with a maximum combined capacity of 1.12 MMBtu per hour.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP (Hexane)
Natural gas-fired units	0.32	1.28	1.28	0.10	16.9	0.93	14.2	20,354	0.32	0.30
Total PTE of Entire Source	0.32	1.28	1.28	0.10	16.9	0.93	14.2	20,354	0.32	0.30
Exemptions Levels**	5	5	5	10	10	10	25	100,000	25	10
Registration Levels**	25	25	25	25	25	25	100	100,000	25	10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of NO_x are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the two boilers at the facility each have a maximum design heat input of less than 10 MMBtu/hr (40 CFR 60.40c(a)).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Perchloroethylene Air Emission Standards for Dry Cleaning Facilities, 40 CFR 63.320, Subpart M (326 IAC 20-7), are not included in the permit, since this facility does not conduct dry cleaning.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process

Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included in the permit, since this facility is not a major source of HAPs.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11194, Subpart JJJJJ, are not included in the permit, since the boilers at this facility are each considered a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e).
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have

potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Natural Gas-Fired Boilers

- (j) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), each of the natural gas-fired boilers is subject to the requirements of 326 IAC 6-2-4, since each is a source of indirect heating that was constructed after September 21, 1983. The total source maximum operating capacity rating (Q) is 16.74 MMBtu/hr ($Q = 8.37 + 8.37 = 16.74$ MMBtu/hr). Pursuant to 326 IAC 6-2-4, the particulate emissions from the natural gas-fired boilers shall not exceed 0.52 pounds per million British thermal units (lb/MMBtu) heat input. The pound per hour limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

Based on the AP-42, Chapter 1.4, uncontrolled natural gas combustion particulate emission factor of 1.9 pounds per million cubic foot (MMCF) of natural gas, each of the natural gas-fired boilers has particulate emissions as follows:

$$(1.9 \text{ pound PM/MMCF}) * (\text{MMCF}/1020 \text{ MMBtu}) = 0.00186 \text{ pound PM per MMBtu}$$

Therefore, each of the natural gas-fired boilers is able to comply with the particulate emission limitation under 326 IAC 6-2-4 without the use of a control device.

- 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(1), the natural gas-fired boilers are each not subject to the requirements of 326 IAC 6-3, since they each utilize combustion for indirect heating.

- 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired boilers are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Natural Gas-Fired Dryers and Space Heaters

- 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired dryers and space heaters are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The natural gas-fired dryers and space heaters are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the natural gas-fired dryers and space heaters are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 28, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. R003-32058-00391. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317)234-6544 or toll free at 1-800-451-602.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Hospital Laundry Service Inc.
Source Address: 3322 Cavalier Dr., Fort Wayne, Indiana 46808
Permit Number: R003-32058-00391
Reviewer: Brian Wright

Source	MMBtu/hr
Boiler CLEBOI 001	8.37
Boiler CLEBOI 002	8.37
Challenge Dryer CHADRY 001	2.50
Challenge Dryer CHADRY 001	2.50
Milnor Dryer MILDRY 001	1.40
Milnor Dryer MILDRY 002	1.40
Milnor Dryer MILDRY 003	1.40
Milnor Dryer MILDRY 004	1.40
Milnor Dryer MILDRY 005	1.80
Milnor Dryer MILDRY 006	1.80
Milnor Dryer MILDRY 007	1.80
Milnor Dryer MILDRY 008	1.80
Milnor Dryer MILDRY 009	1.80
Milnor Dryer MILDRY 010	1.80
Eleven (11) Space Heaters	1.12
Total	39.26

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
39.26	1020	337.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.32	1.28	1.28	0.10	16.86	0.93	14.16

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

updated 7/11

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

**Company Name: Hospital Laundry Service Inc.
 Source Address: 3322 Cavalier Dr., Fort Wayne, Indiana 46808
 Permit Number: R003-32058-00391
 Reviewer: Brian Wright**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.5E-04	2.0E-04	1.3E-02	0.30	5.7E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.4E-05	1.9E-04	2.4E-04	6.4E-05	3.5E-04

Methodology is the same as page 1.

Total HAPs
0.32

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Greenhouse Gas Emissions**

Company Name: Hospital Laundry Service Inc.
Source Address: 3322 Cavalier Dr., Fort Wayne, Indiana 46808
Permit Number: R003-32058-00391
Reviewer: Brian Wright

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	20,230	0.39	0.37
Summed Potential Emissions in tons/yr	20,231		
CO2e Total in tons/yr	20,354		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission Factor (lb/MMCF) / 2,000 lb/ton$
 $CO2e (tons/yr) = CO2 Potential Emission ton/yr \times CO2 GWP (1) + CH4 Potential Emission ton/yr \times CH4 GWP (21) + N2O Potential Emission ton/yr \times N2O GWP (310).$

updated 7/11



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
www.idem.IN.gov

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Mark Lennart
Hospital Laundry Service, Inc.
3322 Cavalier Drive
Fort Wayne, IN 46808

DATE: July 25, 2012

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Registration
003-32058-00391

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.


The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Dan Garman – Chairman of the Board
Alic Bent – August Mack Environmental, Inc.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 7/25/2012 Hospital Laundry Service Inc. 003-32058-00391 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Mark Lennart Hospital Laundry Service Inc. 3322 Cavalier Dr Fort Wayne IN 46808-4425 (Source CAATS) via confirmed delivery										
2		Dan Garman Chairman of the Board Hospital Laundry Service Inc. 3322 Cavalier Dr Fort Wayne IN 46808-4425 (RO CAATS)										
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
5		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)										
6		Mr. John E. Hampton Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
7		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
8		Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)										
9												
10												
11												
12												
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14												
15												

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