



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: September 4, 2014

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

Source Name: Cintas

Permit Level: New Source Review and Federally Enforceable State Operating Permit

Permit Number: 003-33712-00397

Source Location: 3201 Brooklyn Avenue, Fort Wayne, Indiana

Type of Action Taken: Initial Permit

### **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 33712.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit 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.

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 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, 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.



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Michael R. Pence  
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## New Source Review and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

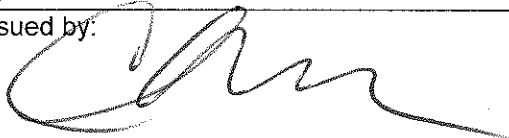
Cintas  
3201 Brooklyn Avenue  
Fort Wayne, IN 46809

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

|   |  |
|---|--|
| Operation Permit No.: F003-33712-00397  |  |
| Issued by:<br><br>Chrystal A. Wagner, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: September 4, 2014<br>Expiration Date: September 4, 2019 |

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ATTACHMENT A - Industrial Laundry Definition

## SECTION A

## SOURCE SUMMARY

This permit 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee 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 Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary commercial laundry facility.

|                              |  |
|------------------------------|--|
| Source Address:              | 3201 Brooklyn Avenue, Fort Wayne, IN 46809   |
| General Source Phone Number: | (260) 243-5988   |
| SIC Code:                    | 7218   |
| County Location:             | Allen  |
| Source Location Status:      | Attainment for all criteria pollutants   |
| Source Status:               | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Eight (8) Washers, identified as EU1 through EU8 installed between 2009 and 2011, each with a nominal capacity of 400 pounds of dry textiles per load and a maximum throughput capacity of 500 pounds of soiled laundry per load, with no controls and exhausting inside the building.
- (b) One (1) Pony Washer, identified as EU9, installed between 2009 and 2011, with a nominal capacity of 140 pounds of dry textiles per load and a maximum throughput capacity of 175 pounds of soiled laundry per load, with no controls and exhausting inside the building.
- (c) Four (4) natural gas-fired Industrial Dryers, identified as EU10, through EU13, installed between 2009 and 2011, each with a nominal capacity of 500 pounds of dry textiles per load each, and a maximum heat input capacity of 2.8 million British thermal units per hour (MMBtu/hr) each, utilizing dryer lint filters for particulate control and exhausting through various dryer stacks
- (d) One (1) natural gas-fired Pony Dryer, identified as EU14, installed between 2009 and 2011, with a with a nominal capacity of 110 pounds of dry textiles per load, and a maximum heat input capacity of 0.3 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through various a dryer stack.
- (e) One (1) Wastewater Treatment System, Identified as EU15, installed between 2009 and 2011, with a nominal rated capacity of 200 gallons per minute of wastewater, with no emissions controls and exhausting through general room ventilation.

\*Note: Shop Towels have an effective wash cycle time of 1.5 hours per load. Dryers have an effective cycle time of 45 minutes per load.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) One (1) natural gas-fired Steam Tunnel, identified as EU17, installed between 2003 and 2007, with a maximum heat input capacity of 1.5 MMBtu/hr, with no controls and exhausting through a stack.
- (b) One (1) natural gas-fired Boiler, identified as EU16, installed between 2003 and 2007, with a maximum heat input capacity of 8.37 MMBtu/hr, with no controls and exhausting through a stack.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (1) MMBtu per hour consisting of the following:
  - (1) Six (6) natural gas-fired Building Heaters (HVAC), identified as Heaters #1, #6, #8, #10, #13, and #15, each with a maximum heat input capacity of 0.15 MMBtu/hr;
  - (2) Four (4) natural gas-fired Building Heaters (HVAC), identified as Heaters #2 through #5, each with a maximum heat input capacity of 0.4 MMBtu/hr;
  - (3) Five (5) natural gas-fired Building Heaters (HVAC), identified as Heaters #7, #9, #11, #12, and #14, each with a maximum heat input capacity of 0.18 MMBtu/hr;
  - (4) Five (5) natural gas-fired Building Heaters (HVAC), identified as Heaters #18 through #22, each with a maximum heat input capacity of 0.2 MMBtu/hr;
  - (5) One (1) natural gas-fired Building Heater (HVAC), identified as Heater #16, with a maximum heat input capacity of 0.16 MMBtu/hr;
  - (6) One (1) natural gas-fired Building Heater (HVAC), identified as Heater #17, with a maximum heat input capacity of 0.28 MMBtu/hr;
- (d) Fugitive PM emissions from paved roads.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

Terms in this permit 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 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F003-33712-00397, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and



- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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, Indiana 46204-2251

- (b) The annual compliance certification report 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, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit 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 Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee 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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee 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 Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

- (a) All terms and conditions of permits established prior to F003-33712-00397 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 permit.

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**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.



## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 twenty percent (20%) 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.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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The Permittee 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).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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 notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

---

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
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  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### **C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

**C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission 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 on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.



## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Eight (8) Washers, identified as EU1 through EU8 installed between 2009 and 2011, each with a nominal capacity of 400 pounds of dry textiles per load and a maximum throughput capacity of 500 pounds of soiled laundry per load, with no controls and exhausting inside the building.
- (b) One (1) Pony Washer, identified as EU9, installed between 2009 and 2011, with a nominal capacity of 140 pounds of dry textiles per load and a maximum throughput capacity of 175 pounds of soiled laundry per load, with no controls and exhausting inside the building.
- (c) Four (4) natural gas-fired Industrial Dryers, identified as EU10, through EU13, installed between 2009 and 2011, each with a nominal capacity of 500 pounds of dry textiles per load each, and a maximum heat input capacity of 2.8 million British thermal units per hour (MMBtu/hr) each, utilizing dryer lint filters for particulate control and exhausting through various dryer stacks
- (d) One (1) natural gas-fired Pony Dryer, identified as EU14, installed between 2009 and 2011, with a with a nominal capacity of 110 pounds of dry textiles per load, and a maximum heat input capacity of 0.3 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through a dryer stack.
- (e) One (1) Wastewater Treatment System, Identified as EU15, installed between 2009 and 2011, with a nominal rated capacity of 200 gallons per minute of wastewater, with no emissions controls and exhausting through general room ventilation.
- (f) One (1) natural gas-fired Steam Tunnel, identified as EU17, installed between 2003 and 2007, with a maximum heat input capacity of 1.5 MMBtu/hr, with no controls and exhausting through a stack.

(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 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) Minor Limits [326 IAC 2-8][326 IAC 8-1-6]

In order to render the requirements of 326 IAC 2-7 and 326 IAC 8-1-6 not applicable, the following limitations are applicable:

- (a) The maximum combined throughput weight of soiled shop towels (SST) to the washers shall be limited to 22,352,941 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from washing and drying shop towels and the waste water treatment operation, combined, shall be limited to 8.5 pounds per 1000 pounds of soiled laundry.
- (c) The Permittee shall receive and process all textile goods in accordance with the definitions contained in Attachment A of this permit.
- (d) The Permittee shall implement the following good work practices:
  - (1) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a covered area or in sealed containers prior to being shipped off-site for laundering.

- (2) Shop towels containing or saturated with free liquid shall not be processed at this facility.
- (3) Soiled shop towels shall be processed separately from other textile goods.

Compliance with these limits, combined with the potential to emit from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

These limits shall, likewise, limit the VOC emissions from the wastewater treatment operations to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

#### D.1.2 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following units shall not exceed the pound per hour limits as follows:

| Emission Unit/ID | Process Weight rate<br>(tons/hr) | Particulate Emission<br>Limit (pound/hour) |
|------------------|----------------------------------|--|
| Dryer, EU10      | 0.33                             | 1.96                                       |
| Dryer, EU11      | 0.33                             | 1.96                                       |
| Dryer, EU12      | 0.33                             | 1.96                                       |
| Dryer, EU13      | 0.33                             | 1.96                                       |

The pound per hour limitations for the emissions units in the above table shall be calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### D.1.3 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits required in Condition D.1.1. Records necessary to demonstrate compliance shall be available not later than thirty (30) days of the end of each compliance period.
  - (1) The total weight of soiled shop towels (SST) processed at all washers on monthly basis.
  - (2) The corresponding total VOC emissions for each month, using an emission factor of 8.5 pounds of VOC per 1000 pounds of SST.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.4 Reporting Requirements

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A monthly summary of the information to document the compliance status with Condition D.1.1 shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. This report requires the certification by a "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:** Insignificant Activities

- (g) One (1) natural gas-fired Boiler, identified as EU16, installed between 2003 and 2007, with a maximum heat input capacity of 8.37 MMBtu/hr, with no controls and exhausting through a stack.

(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 2-8-4(1)]**

#### **D.2.1. Particulate Matter [326 IAC 6-2-4]**

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Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from EU16 shall not exceed 0.6 pounds per million BTU.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**  
**CERTIFICATION**

Source Name: Cintas  
Source Address: 3201 Brooklyn Avenue, Fort Wayne, IN 46809  
FESOP Permit No.: F003-33712-00397

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)\_\_\_\_\_
- ☐ Report (specify)\_\_\_\_\_
- ☐ Notification (specify)\_\_\_\_\_
- ☐ Affidavit (specify)\_\_\_\_\_
- ☐ Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Cintas  
Source Address: 3201 Brooklyn Avenue, Fort Wayne, IN 46809  
FESOP Permit No.: F003-33712-00397

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|---|

If any of the following are not applicable, mark N/A

|   |
|---|
| Facility/Equipment/Operation:                       |
| Control Equipment:                                  |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency:                       |
| Describe the cause of the Emergency:                |

If any of the following are not applicable, mark N/A

**Page 2 of 2**

|   |
|---|
| Date/Time Emergency started:  |
| Date/Time Emergency was corrected:  |
| Was the facility being properly operated at the time of the emergency?    Y    N<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency:  |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Cintas  
Source Address: 3201 Brooklyn Avenue, Fort Wayne, IN 46809  
FESOP Permit No.: F003-33712-00397  
Facility: Wastewater Treatment Operation  
Parameter: Soiled shop towels (SST) throughput  
Limit: Maximum combined throughput weight of soiled shop towels (SST) to the washers shall be limited to 22,352,941 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

| Month   | Column 1                            | Column 2                                    | Column 1 + Column 2                     |
|---------|-------------------------------------|---|---|
|         | Throughput Weight of SST This Month | Throughput Weight of SST Previous 11 Months | Throughput Weight of SST 12 Month Total |
| Month 1 |                                     |   |   |
| Month 2 |                                     |   |   |
| Month 3 |                                     |   |   |

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Cintas  
Source Address: 3201 Brooklyn Avenue, Fort Wayne, IN 46809  
FESOP Permit No.: F003-33712-00397

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

Page 2 of 2

|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**New Source Review and Federally Enforceable State  
Operating Permit  
OFFICE OF AIR QUALITY**

**Cintas  
3201 Brooklyn Avenue  
Fort Wayne, IN 46809**

**Attachment A**

**to**

**NSR/ F003-33712-00397**

**Industrial Laundry Definitions**

Applicability: All Cintas Corporation locations within the State of Indiana, for the purposes of air quality permitting.

Effective Date: May 20, 2014

Revision Date: May 20, 2014

Revision Level: 0

The following industrial laundry definitions shall apply to all Cintas Corporation air permits:

### **Soiled Weight**

For purposes of calculating air emissions, "soiled weight" shall be defined as the weight of each fabric to be laundered when it is received into the facility, including all liquids and solids contained in and on the fabric.

### **Shop Towel**

For the purposes of air quality permitting, "shop towel" shall be defined as any piece of fabric of any material that is used to clean equipment, parts, objects, or surfaces of general soil, grease, oil, solids, or solvents containing low flash points. A "low flash point" shall be defined as any liquid, solid, or solvent with a flash point of higher than 140°F. Shop towels shall not contain free liquids.

### **Print Towel**

For the purposes of air quality permitting, "print towel" shall be defined as any piece of fabric of any material that is used to clean printing equipment, parts, object, or surfaces used in the printing or graphic arts industry (SIC CODE 27, or NAICS Code 323), that contains any liquid, solid, or solvent with a flash point of less than 140°F. Print towels shall not contain free liquids.

### **Furniture Towel**

For the purpose of air quality permitting, "furniture towel" shall be defined as any piece of fabric of any material that is used to clean equipment, parts, objects, or surfaces used in the wood manufacturing finishing, or refinishing industry (SIC Code 25 or NAICS Code 337), that contains any liquid, solid, or solvent with a flash point of less than 140°F. Furniture towels shall not contain free liquids.

### **Other Towel**

For the purposes of air quality permitting, "other towel" shall be defined as any piece of fabric of any materials that is received into the industrial laundering facility to be laundered that is not a furniture towel, or print towel, or shop towel, as defined above, that contains any liquid or solid. Other towels shall not contain free liquids.

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

**Technical Support Document (TSD) for a New Source Review and  
Federally Enforceable State Operating Permit (FESOP)**

|  |
|--|
| <b>Source Description and Location</b> |
|--|

|                              |  |
|------------------------------|--|
| <b>Source Name:</b>          | Cintas                                   |
| <b>Source Location:</b>      | 3201 Brooklyn Ave., Fort Wayne, IN 46809 |
| <b>County:</b>               | Allen                                    |
| <b>SIC Code:</b>             | 7218                                     |
| <b>Operation Permit No.:</b> | F003-33712-00397                         |
| <b>Permit Reviewer:</b>      | APT                                      |

On September 30, 2013, the Office of Air Quality (OAQ) received an application from Cintas related to the operation of an existing stationary commercial laundry facility.

|                               |
|-------------------------------|
| <b>Background Information</b> |
|-------------------------------|

In 2007, the Connecticut Department of Energy and Environmental Protection (DEEP) discovered that laundering industrial textile products (product), including but not limited to towels, wipers, rags, mats, mops, and uniforms and other garments, that are soiled with materials that primarily include, but are not limited to, oils, lubricants, greases, and other protective coatings, inks, extenders, diluents, fountain solutions, fountain solution additives, blanket washes, adhesives, pigments, fillers, coatings, varnishes, solvents and solutions, and other miscellaneous chemicals, liberates these chemicals from the product and results in the release of high levels of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). The DEEP alerted the U.S. Environmental Protection Agency (EPA), which has launched its own investigation into these industrial laundry processes.

On May 1, 2013, Indiana Department of Environmental Management (IDEM) sent out letters to all Indiana launderers describing its initiative related to this industry.

(a) The affected industry is categorized as follows:

- (1) **SIC Code 7218** (Industrial Launderers) - is defined as establishments primarily engaged in supplying laundered or dry cleaned industrial work uniforms and related work clothing, such as protective apparel (flame and heat resistant) and clean room apparel; laundered mats and rugs; dust control items, such as treated mops, rugs, mats, dust tool covers, and cloths; laundered wiping towels; and other selected items to industrial, commercial, and government users. These items may belong to the industrial launderer and be supplied to users on a rental basis, or they may be the customers' own goods. Establishments included in this industry may or may not operate their own laundry or dry cleaning facilities.
- (2) **NAICS Code 812332** (Industrial Launderers) - is defined as a U.S. industry that comprises establishments primarily engaged in supplying, on a rental or contract basis, laundered industrial work uniforms and related work clothing, such as protective apparel (flame and heat resistant) and clean room apparel; dust control items, such as treated mops, rugs, mats, dust tool covers, cloths, and shop or wiping towels.

(b) Cintas laundry process description:

- (1) Cintas launders a variety of products that it rents to customers, including uniforms, wet mops, bar towels, mats and shop towels. Cintas does not launder any print or furniture towels. The vast majority of material laundered involves uniforms. Shop towels comprise less than 5% of the laundry load at the facility. The soiled shop towels received do not have free liquids.

The soiled laundry is delivered to the facility via delivery trucks and is unloaded at the unloading bay, sorted into slings, weighed and staged for laundering. The staged laundry is transported to the wash alley via overhead conveyor lines or large bins. The soiled laundry is loaded into a washing machine and washed with detergent and hot water. Washing times vary depending on the type of product being washed based on established formulations. The formulation for towels takes approximately 55 minutes of wash time. Allowing for the time to load and unload laundry, the effective wash time for a shop towel load is approximately 90 minutes. Washing machines vent inside the building.

After the wash cycle, the wet laundry is transferred to a dryer via a movable conveyor. Drying times are generally consistent between product types, lasting approximately 45 minutes. Each dryer vents via its own stack exhausting through the roof. The dried laundry is automatically transferred from the back of the dryers onto conveyor line, where it is sorted for final processing.

Wastewater generated from the laundering process consists of hot water from the washing machines. The wash water is discharged to an on-site wastewater treatment plant (WWTP) which is designed to remove solids from the wastewater. The WWTP has screening and equalization with a design flow rate of 150 gallon per minute. The treated wastewater is then discharged to the local sewer system under an industrial wastewater permit from the Sanitary District of Hammond.

Note: See Attachment A for definitions related to this industry.

#### 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 <sub>2</sub>  | Better than national standards.  |
| CO   | Unclassifiable or attainment effective November 15, 1990.  |
| O <sub>3</sub>   | Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup> |
| PM <sub>2.5</sub>  | Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.       |
| PM <sub>2.5</sub>  | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.  |
| PM <sub>10</sub>   | Unclassifiable effective November 15, 1990.  |
| NO <sub>2</sub>  | Cannot be classified or better than national standards.  |
| Pb   | Unclassifiable or attainment effective December 31, 2011.  |
| <sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. |  |

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> 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 NO<sub>x</sub> 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  $PM_{2.5}$ . Therefore, direct  $PM_{2.5}$ ,  $SO_2$ , and  $NO_x$  emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (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**

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Background and Description of Source**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Cintas on September 30, 2013, relating to the operation of an existing commercial laundry. The source consists of the following unpermitted emission units and control devices:

- (a) Eight (8) Washers, identified as EU1 through EU8 installed between 2009 and 2011, each with a nominal capacity of 400 pounds of dry textiles per load and a maximum throughput capacity of 500 pounds of soiled laundry per load, with no controls and exhausting inside the building.
- (b) One (1) Pony Washer, identified as EU9, installed between 2009 and 2011, with a nominal capacity of 140 pounds of dry textiles per load and a maximum throughput capacity of 175 pounds of soiled laundry per load, with no controls and exhausting inside the building.
- (c) Four (4) natural gas-fired Industrial Dryers, identified as EU10, through EU13, installed between 2009 and 2011, each with a nominal capacity of 500 pounds of dry textiles per load, and a maximum heat input capacity of 2.8 million British thermal units per hour (MMBtu/hr) each, utilizing dryer lint filters for particulate control and exhausting through various dryer stacks.
- (d) One (1) natural gas-fired Pony Dryer, identified as EU14, installed between 2009 and 2011, with a nominal capacity of 110 pounds of dry textiles per load, and a maximum heat input capacity of 0.3 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through a dryer stack.
- (e) One (1) Wastewater Treatment System, identified as EU15, installed between 2009 and 2011, with a nominal rated capacity of 200 gallons per minute of wastewater, with no emissions controls and exhausting internally through general room ventilation.
- (f) One (1) natural gas-fired Steam Tunnel, identified as EU17, installed between 2003 and 2007, with a maximum heat input capacity of 1.5 MMBtu/hr, with no controls and exhausting through a stack.
- (g) One (1) natural gas-fired Boiler, identified as EU16, installed between 2003 and 2007, with a maximum heat input capacity of 8.37 MMBtu/hr, with no controls and exhausting through a stack.
- (h) Natural gas-fired combustion sources with heat inputs equal to or less than ten (1) MMBtu per hour consisting of the following:

- (1) Six (6) natural gas-fired Building Heaters (HVAC), identified as Heaters #1, #6, #8, #10, #13, and #15, each with a maximum heat input capacity of 0.15 MMBtu/hr;
  - (2) Four (4) natural gas-fired Building Heaters (HVAC), identified as Heaters #2 through #5, each with a maximum heat input capacity of 0.4 MMBtu/hr;
  - (3) Five (5) natural gas-fired Building Heaters (HVAC), identified as Heaters #7, #9, #11, #12, and #14, each with a maximum heat input capacity of 0.18 MMBtu/hr;
  - (4) Five (5) natural gas-fired Building Heaters (HVAC), identified as Heaters #18 through #22, each with a maximum heat input capacity of 0.2 MMBtu/hr;
  - (5) One (1) natural gas-fired Building Heater (HVAC), identified as Heater #16, with a maximum heat input capacity of 0.16 MMBtu/hr;
  - (6) One (1) natural gas-fired Building Heater (HVAC), identified as Heater #17, with a maximum heat input capacity of 0.28 MMBtu/hr;
- (i) Fugitive PM emissions from paved roads.

\*Note: Shop Towels have an effective wash cycle time of 1.5 hours per load. Dryers have an effective cycle time of 45 minutes per load.

#### Enforcement Issues

IDEM is aware that the entire source was constructed and operated prior to receipt of the proper permit (CWOP/OWOP). 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 – FESOP

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.

| Pollutant                        | Potential To Emit (tons/year) |
|----------------------------------|-------------------------------|
| PM                               | 23.63                         |
| PM <sub>10</sub> <sup>(1)</sup>  | 24.27                         |
| PM <sub>2.5</sub> <sup>(1)</sup> | 24.27                         |
| SO <sub>2</sub>                  | 0.07                          |
| NO <sub>x</sub>                  | 11.25                         |
| VOC                              | 105                           |
| CO                               | 9.45                          |
| GHG as CO <sub>2</sub> e         | 13,588.05                     |

<sup>(1)</sup> Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM<sub>2.5</sub>), not particulate matter (PM), are each considered as a "regulated air pollutant".



| HAPs                                    | Potential To Emit (tons/year) |
|---|-------------------------------|
| 2,2,4 - Trimethylpentane                | 0.30                          |
| Chloromethane                           | 0.01                          |
| Methylene Chloride<br>(Dichloromethane) | 0.32                          |
| Chloroform                              | 0.16                          |
| Trichloroethylene                       | 0.03                          |
| Tetrachloroethylene                     | 5.99                          |
| Benzene                                 | 0.05                          |
| Toluene                                 | 3.12                          |
| Ethyl Benzene                           | 0.81                          |
| Styrene                                 | 0.03                          |
| Hexane                                  | 0.18                          |
| Xylene                                  | 4.08                          |
| 2,2,4 - Trimethylpentane                | 0.30                          |
| <b>TOTAL HAPs</b>                       | <b>15.09</b>                  |

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3 and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) 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).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHG) is less than the Title V subject-to-regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year.

**PTE of the Entire Source After Issuance of the FESOP**

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Emission Unit   | Potential To Emit of the Entire Source After Issuance of FESOP (tons/year) - Limited/Controlled |       |       |       |       |       |       |          |            |                  |                      |
|---|---|-------|-------|-------|-------|-------|-------|----------|------------|------------------|----------------------|
|   | PM  | PM10  | PM2.5 | SO2   | NOx   | VOC   | CO    | CO2e     | Total HAPs | Worst Single HAP |                      |
| Washers EU1 - EU9   | -----   | ----- | ----- | ----- | ----- | 95.00 | ----- | -----    | 13.83      | 5.49             | Tetrachloro ethylene |
| Dryers EU10-EU14  | 3.51  | 3.51  | 3.51  |       |       |       | ----- | -----    |            |                  |                      |
| Wastewater Treatment Plant EU15   | -----   | ----- | ----- | ----- | ----- |       | ----- | -----    |            |                  |                      |
| Natural Gas Combustion  | 0.21  | 0.86  | 0.86  | 0.07  | 11.25 | 0.62  | 9.45  | 13588.05 | 0.21       | 0.20             | Hexane               |
| Total Non-Fugitive Emissions  | 3.73  | 4.37  | 4.37  | 0.07  | 11.25 | 95.62 | 9.45  | 13588.05 | 14.04      | 5.49             | Tetrachloro ethylene |
| Title V Major Source Thresholds**   | NA  | 100   | 100   | 100   | 100   | 100   | 100   | 100,000  | 25         | 10               | --                   |
| PSD Major Source Thresholds**   | 250   | 250   | 250   | 250   | 250   | --    | 250   | --       | NA         | NA               | --                   |
| Subject to Regulation   | --  | --    | --    | --    | --    | --    | --    | 100,000  | --         | --               | --                   |
| *Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a regulated air pollutant".   |   |       |       |       |       |       |       |          |            |                  |                      |
| **The 100,000 CO <sub>2e</sub> 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. |   |       |       |       |       |       |       |          |            |                  |                      |

Note: The number of loads for all process units is based on a washer's running time. The maximum number of loads that can be processed depends on the capacities of the washers. All soiled laundry (SL) washed are assumed to be dried.

#### FESOP Status

This existing CWOP/OWOP source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing CWOP/OWOP source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The maximum combined throughput weight of soiled shop towels (SST) to the washers shall be limited to 22,352,941 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from washing and drying shop towels and the waste water treatment operation, combined, shall be limited to 8.5 pounds per 1000 pounds of soiled shop towels.
- (c) The Permittee shall receive and process all textile goods in accordance with the definitions contained in Attachment A of this permit.
- (d) The Permittee shall implement the following good work practices:
  - (1) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a covered area or in sealed containers prior to being shipped off-site for laundering.
  - (2) Shop towels containing or saturated with free liquid shall not be processed at this facility.
  - (3) Soiled shop towels shall be processed separately from other textile goods.

Compliance with these limits, combined with the potential to emit from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

These limits shall, likewise, limit the VOC emissions from the wastewater treatment operations to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

(see 326 IAC 8-1-6 discussion in the State Rule Applicability Determination section of this document).

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR Part 60, Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

The Boiler, EU16 is not subject to this NSPS because its heat input rating is 8.37 MMBtu/hr which is less than ten (10) MMBtu/hr.

There are no other 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)

40 CFR Part 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

This rule applies to area sources with new and existing boilers belonging to one of the following subcategories as defined in Section 63.11237:

- (1) Coal
- (2) Biomass
- (3) Oil
- (4) Seasonal boilers
- (5) Oil-fired boilers with heat input capacity of equal to or less than 5 million British thermal units (Btu) per hour
- (6) Boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up.
- (7) Limited-use boilers.

The 8.37 MMBtu/hr natural-gas-fired Boiler, identified as EU16 is not subject to this area NESHAP because it is not one of the subcategories listed in the rule.

There are no other 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)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 - Entire Source**

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

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.

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:

- (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.

326 IAC 6-4 (Fugitive Dust Emissions)

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because operations at the source have potential fugitive particulate emissions less than twenty-five (25) tons per year.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

|   |
|---|
| <b>State Rule Applicability Determination - Individual Facilities</b> |
|---|

Combustion Units

326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)

- (a) The one (1) natural gas-fired Boiler, EU16 with a maximum heat input capacity of 8.37 MMBtu/hr, is subject to 326 IAC 6-2-4(a) since it was constructed after September 21, 1983. The boiler is limited using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

= 0.63 lb/MMBtu; however, since the boiler's Q is less than ten (10) MMBtu/hr it is, therefore, limited to 0.6 lb/MMBtu.

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than ten (10) MMBtu/hr, Pt shall not exceed 0.6. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1.

- (b) Dryers EU10 through EU14 are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

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

This rule shall apply to the following emission units and shall not exceed the pound per hour emission rates in the table:

| Emission Unit/ID | Process Weight rate<br>(tons/hr) | Uncontrolled Potential<br>to Emit (lb/hr) | Particulate Emission<br>Limit (pound/hour) |
|------------------|----------------------------------|---|--|
| Dryer, EU10      | 0.33                             | 1.27                                      | 1.96                                       |
| Dryer, EU11      | 0.33                             | 1.27                                      | 1.96                                       |
| Dryer, EU12      | 0.33                             | 1.27                                      | 1.96                                       |
| Dryer, EU13      | 0.33                             | 1.27                                      | 1.96                                       |
| Dryer, EU14      | 0.07                             | 0.28                                      | Not applicable <sup>1</sup>                |

The above emission limits were established as E in the following equations

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour}$$

<sup>1</sup>326 IAC 6-3-2 is not applicable to emission units with PTE below 0.551 lb/hr

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The unlimited VOC potential emissions from the wastewater treatment facility identified as EU15 are greater than twenty-five (25) tons per year. These potential emissions are based on the maximum soiled shop towel loads to the washers. The Permittee has chosen to limit the sourcewide potential to emit VOC to less than 100 tons per year to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable. These limits shall, likewise, limit the VOC emissions from the wastewater treatment operations to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and 326 IAC 8-1-6, the source shall comply with the following:

- (a) The maximum combined throughput weight of soiled shop towels (SST) to the washers shall be limited to 22,352,941 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from washing and drying shop towels and the waste water treatment operation, combined, shall be limited to 8.5 pounds per 1000 pounds of soiled shop towels (SST).

- (c) The Permittee shall implement the following good work practices:
- (1) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a covered area or in sealed containers prior to being shipped off-site for laundering.
  - (2) Shop towels containing or saturated with free liquid shall not be processed at this facility.
  - (3) Soiled shop towels shall be processed separately from other textile goods.

Compliance with these limits, combined with the potential to emit from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

These limits shall, likewise, limit the VOC emissions from the wastewater treatment operations to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable (see 326 IAC 8-1-6 discussion in the State Rule Applicability Determination section of this document).

There are no other 326 IAC 8 Rules that are applicable to the source.

#### **Compliance Determination, Monitoring and Testing Requirements**

There are no compliance determination and monitoring requirements applicable to this source.

#### **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 September 30, 2013.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No.: F003-33712-00397. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Angela Taylor 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) 234-5329 or toll free at 1-800-451-6027 extension 4-5329.
- (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](http://www.in.gov/idem)

**Appendix A: Emissions Calculations**

Page 1 of 6 TSD App A

**Company Name:** Cintas  
**Address City IN Zip:** 3201 Brooklyn Ave., Fort Wayne, IN 46809  
**Permit Number:** F003-33712-00397  
**SIC Code:** 7218  
**Reviewer:** APT  
**Application Date:** 9/30/2013

|                                       | Uncontrolled Potential to Emit (tons per year) |       |       |       |       |        |       |          |            |                  |                      |
|---------------------------------------|--|-------|-------|-------|-------|--------|-------|----------|------------|------------------|----------------------|
| Emission Unit                         | PM   | PM10  | PM2.5 | SO2   | NOx   | VOC    | CO    | CO2e     | Total HAPs | Worst Single HAP |                      |
| Non-Fugitive Emissions                |  |       |       |       |       |        |       |          |            |                  |                      |
| Washers EU1 - EU9                     | -----  | ----- | ----- | ----- | ----- | 6.46   | ----- | -----    | 15.09      | 5.99             | Tetrachloro ethylene |
| Dryers EU10-EU14                      | 23.41  | 23.41 | 23.41 | ----- | ----- | 70.73  | ----- | -----    |            |                  |                      |
| Wastewater Treatment Plant EU15       | -----  | ----- | ----- | ----- | ----- | 27.19  | ----- | -----    |            |                  |                      |
| Natural Gas Combustion                | 0.21   | 0.86  | 0.86  | 0.07  | 11.25 | 0.62   | 9.45  | 13,588   | 0.21       | 0.20             | Hexane               |
| Total Non-Fugitive Emissions          | 23.63  | 24.27 | 24.27 | 0.07  | 11.25 | 105.00 | 9.45  | 13588.05 | 15.30      | 5.99             | Tetrachloro ethylene |
| Fugitive Emissions                    |  |       |       |       |       |        |       |          |            |                  |                      |
| Paved Roads (Fugitive)                | 0.18   | 0.04  | 0.01  | ----- | ----- | -----  | ----- | -----    | -----      | -----            | -----                |
| Total Fugitive Emissions              | 0.18   | 0.04  | 0.01  | ----- | ----- | -----  | ----- | -----    | -----      | -----            | -----                |
| Total Source-wide PTE (tons per year) | 23.80  | 24.30 | 24.28 | 0.07  | 11.25 | 105.00 | 9.45  | 13588.05 | 15.30      | 5.99             | Tetrachloro ethylene |
| Title V Permit Threshold              | NA   | 100   | 100   | 100   | 100   | 100    | 100   | 100,000  | 25         | 10               |                      |

| Emission Unit                         | Limited/Controlled Potential to Emit (tons per year) |       |       |       |       |       |       |          |            |                  |                      |
|---------------------------------------|--|-------|-------|-------|-------|-------|-------|----------|------------|------------------|----------------------|
|                                       | PM   | PM10  | PM2.5 | SO2   | NOx   | VOC   | CO    | CO2e     | Total HAPs | Worst Single HAP |                      |
| Non-Fugitive Emissions                |  |       |       |       |       |       |       |          |            |                  |                      |
| Washers EU1 - EU9                     | -----  | ----- | ----- | ----- | ----- | 95.00 | ----- | -----    | 13.83      | 5.49             | Tetrachloro ethylene |
| Dryers EU10-EU14                      | 3.51   | 3.51  | 3.51  |       |       |       | ----- | -----    |            |                  |                      |
| Wastewater Treatment Plant EU15       | -----  | ----- | ----- | ----- | ----- |       | ----- | -----    |            |                  |                      |
| Natural Gas Combustion                | 0.21   | 0.86  | 0.86  | 0.07  | 11.25 | 0.62  | 9.45  | 13588.05 | 0.21       | 0.20             | Hexane               |
| Total Non-Fugitive Emissions          | 3.73   | 4.37  | 4.37  | 0.07  | 11.25 | 95.62 | 9.45  | 13588.05 | 14.04      | 5.49             | Tetrachloro ethylene |
| Fugitive Emissions                    |  |       |       |       |       |       |       |          |            |                  |                      |
| Paved Roads (Fugitive)                | 0.18   | 0.04  | 0.01  | ----- | ----- | ----- | ----- | -----    | -----      | -----            | -----                |
| Total Fugitive Emissions              | 0.18   | 0.04  | 0.01  | ----- | ----- | ----- | ----- | -----    | -----      | -----            | -----                |
| Total Source-wide PTE (tons per year) | 3.90   | 4.40  | 4.38  | 0.07  | 11.25 | 95.62 | 9.45  | 13588.05 | 14.04      | 5.49             | Tetrachloro ethylene |

| Emission Unit | EU -ID | Capacity - MMBTU/hr | Emission Unit | EU -ID       | Capacity - MMBTU/hr |
|---------------|--------|---------------------|---------------|--------------|---------------------|
| Boiler        | EU16   | 8.37                | HVAC Unit     | #9           | 0.18                |
| Steam Tunnel  | EU17   | 1.5                 | HVAC Unit     | #10          | 0.15                |
| Dryer         | EU10   | 2.8                 | HVAC Unit     | #11          | 0.18                |
| Dryer         | EU11   | 2.8                 | HVAC Unit     | #12          | 0.18                |
| Dryer         | EU12   | 2.8                 | HVAC Unit     | #13          | 0.15                |
| Dryer         | EU13   | 2.8                 | HVAC Unit     | #14          | 0.18                |
| Dryer         | EU14   | 0.3                 | HVAC Unit     | #15          | 0.15                |
| HVAC Unit     | #1     | 0.15                | HVAC Unit     | #16          | 0.16                |
| HVAC Unit     | #2     | 0.4                 | HVAC Unit     | #17          | 0.28                |
| HVAC Unit     | #3     | 0.4                 | HVAC Unit     | #18          | 0.2                 |
| HVAC Unit     | #4     | 0.4                 | HVAC Unit     | #19          | 0.2                 |
| HVAC Unit     | #5     | 0.4                 | HVAC Unit     | #20          | 0.2                 |
| HVAC Unit     | #6     | 0.15                | HVAC Unit     | #21          | 0.2                 |
| HVAC Unit     | #7     | 0.18                | HVAC Unit     | #22          | 0.2                 |
| HVAC Unit     | #8     | 0.15                | HVAC Unit     | <b>Total</b> | <b>26.21</b>        |

## Appendix A: Emissions Calculations

Page 2 of 6 TSD App A

### Natural Gas Combustion Only MM BTU/HR <100

**Company Name:** Cintas  
**Address City IN Zip:** 3201 Brooklyn Ave., Fort Wayne, IN 46809  
**Permit Number:** F003-33712-00397  
**SIC Code:** 7218  
**Reviewer:** APT  
**Application Date:** 9/30/2013

| Total Heat Input Capacity | HHV<br>mmBtu | Potential Throughput |
|---------------------------|--------------|----------------------|
| MMBtu/hr                  | mmscf        | MMCF/yr              |
| <b>26.2</b>               | <b>1020</b>  | <b>225.1</b>         |

|                               | Pollutant |       |               |     |             |     |     |
|-------------------------------|-----------|-------|---------------|-----|-------------|-----|-----|
|                               | PM*       | PM10* | direct PM2.5* | SO2 | NOx         | VOC | CO  |
| Emission Factor in lb/MMCF    | 1.9       | 7.6   | 7.6           | 0.6 | 100         | 5.5 | 84  |
|                               |           |       |               |     | **see below |     |     |
| Potential Emission in tons/yr | 0.2       | 0.9   | 0.9           | 0.1 | 11.3        | 0.6 | 9.5 |

\*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

### HAPS Calculations

| Emission Factor in lb/MMcf           | HAPs - Organics  |                  |                  |                  |                  | Total - Organics | Total HAPs       |
|--------------------------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
|                                      | Benzene          | Dichlorobenz     | Formaldehyde     | Hexane           | Toluene          |                  | 0.21             |
|                                      | 2.1E-03          | 1.2E-03          | 7.5E-02          | 1.8E+00          | 3.4E-03          | 2.118E-01        | <b>Worst HAP</b> |
|                                      |                  |                  |                  |                  |                  |                  | Hexane           |
| <b>Potential Emission in tons/yr</b> | <b>2.364E-04</b> | <b>1.351E-04</b> | <b>8.441E-03</b> | <b>2.026E-01</b> | <b>3.827E-04</b> |                  | <b>0.20</b>      |

| Emission Factor in lb/MMcf           | HAPs - Metals    |                  |                  |                  |                  | Total - Metals | 6.168E-04 |
|--------------------------------------|------------------|------------------|------------------|------------------|------------------|----------------|-----------|
|                                      | Lead             | Cadmium          | Chromium         | Manganese        | Nickel           |                |           |
|                                      | 5.0E-04          | 1.1E-03          | 1.4E-03          | 3.8E-04          | 2.1E-03          |                |           |
|                                      |                  |                  |                  |                  |                  |                |           |
| <b>Potential Emission in tons/yr</b> | <b>5.627E-05</b> | <b>1.238E-04</b> | <b>1.576E-04</b> | <b>4.277E-05</b> | <b>2.364E-04</b> |                |           |

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

### Greenhouse Gas Calculations

| Emission Factor in lb/MMcf                   | Greenhouse Gas |            |            |
|--|----------------|------------|------------|
|  | CO2            | CH4        | N2O        |
|  | 120,000        | 2.3        | 2.2        |
| <b>Potential Emission in tons/yr</b>         | <b>13,506</b>  | <b>0.3</b> | <b>0.2</b> |
| <b>Summed Potential Emissions in tons/yr</b> | <b>13,506</b>  |            |            |
| <b>CO2e Total in tons/yr</b>                 | <b>13,588</b>  |            |            |

### 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) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



**Appendix A: Emissions Calculations**  
**VOC Emissions From Washers, Dryers and Wastewater Treatment Plant**

Page 3 of 6 TSD App A

**Company Name:** Cintas  
**Address City IN Zip:** 3201 Brooklyn Ave., Fort Wayne, IN 46809  
**Permit Number:** F003-33712-00397  
**SIC Code:** 7218  
**Reviewer:** APT  
**Application Date:** 9/30/2013

TABLE 1

| Emission Unit | Emission Factor (lb VOC/lb of SST) | Total Maximum Capacity Pounds of Soiled Shop Towels/load (lb of SST/yr) | Unrestricted VOC PTE (tons/yr) | Limited Capacity (lb SST/yr) | Limited Sourcewide PTE for VOC (tons/yr) |
|---------------|------------------------------------|---|--------------------------------|------------------------------|--|
| Washer        | 0.53                               |   | 6.5                            |                              | 95                                       |
| Dryers        | 5.74                               | 24,382,000  | 70.0                           | 22,352,941                   |  |
| WWTP          | 2.23                               |   | 27.2                           |                              |  |
| <b>TOTAL</b>  | <b>8.5</b>                         |   | <b>103.6</b>                   |                              | <b>&lt; 100</b>                          |

**Methodology**

Limited Capacity of Soiled Shop Towels/yr=Limited VOC (tons/yr) x 2000 (lb/ton)/8.5 lb VOC/1000 lb SST) x 1000

TABLE 2

| Emission Unit                     | Maximum Capacity Pounds of Soiled Shop Towels (lb of SST/load) | Wash/Dry Cycle Duration (hr) | Maximum Loads per year <sup>1</sup> | Emission Factor (lb VOC/1000 lb SST) <sup>2</sup> | Unrestricted VOC PTE (tons/yr) | Is this facility PTE >= 25 tpy (yes/no) |
|-----------------------------------|--|------------------------------|-------------------------------------|---|--------------------------------|---|
| <b>Washers</b>                    |  |                              |                                     |   |                                |   |
| EU1                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU2                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU3                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU4                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU5                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU6                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU7                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU8                               | 500  | 1.5                          | 5840                                | 0.53  | 0.7738                         | NO                                      |
| EU9                               | 175  | 1.5                          | 5840                                | 0.53  | 0.27083                        | NO                                      |
| <b>Dryers</b> Max. Dry Weight     |  |                              |                                     |   |                                |   |
| EU10                              | 500  | 0.75                         | 11680                               | 5.74  | 16.7608                        | NO                                      |
| EU11                              | 500  | 0.75                         | 11680                               | 5.74  | 16.7608                        | NO                                      |
| EU12                              | 500  | 0.75                         | 11680                               | 5.74  | 16.7608                        | NO                                      |
| EU13                              | 500  | 0.75                         | 11680                               | 5.74  | 16.7608                        | NO                                      |
| EU14                              | 110  | 0.75                         | 11680                               | 5.74  | 3.69                           | NO                                      |
| <b>Wastewater Treatment Plant</b> |  |                              |                                     |   |                                |   |
| EU15                              | 4175   | NA                           | 5840                                | 2.23  | 27.19                          | YES                                     |
| <b>Total</b>                      |  |                              |                                     |   | <b>104.38</b>                  |   |

| Emission Unit                     | Maximum Capacity Pounds of Soiled Shop Towels (lb of SST/load) | Wash/Dry Cycle Duration (hr) | Maximum Loads per year <sup>1</sup> | Emission Factor (lb VOC/1000 lb SST) <sup>2</sup> | Limited VOC PTE (tons/yr) | Is this facility PTE >= 25 tpy (yes/no) |
|-----------------------------------|--|------------------------------|-------------------------------------|---|---------------------------|---|
| <b>Washers</b>                    |  |                              |                                     |   |                           |   |
| EU1                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU2                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU3                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU4                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU5                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU6                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU7                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU8                               | 500  | 1.5                          | 5354                                | 0.53  | 0.70940472                | NO                                      |
| EU9                               | 175  | 1.5                          | 5354                                | 0.53  | 0.24829165                | NO                                      |
| <b>Dryers</b> Max. Dry Weight     |  |                              |                                     |   |                           |   |
| EU10                              | 500  | 0.75                         | 10708                               | 5.74  | 15.36598                  | NO                                      |
| EU11                              | 500  | 0.75                         | 10708                               | 5.74  | 15.36598                  | NO                                      |
| EU12                              | 500  | 0.75                         | 10708                               | 5.74  | 15.36598                  | NO                                      |
| EU13                              | 500  | 0.75                         | 10708                               | 5.74  | 15.36598                  | NO                                      |
| EU14                              | 110  | 0.75                         | 10708                               | 5.74  | 3.38                      | NO                                      |
| <b>Wastewater Treatment Plant</b> |  |                              |                                     |   |                           |   |
| EU15                              | 4175   | NA                           | 5354                                | 2.23  | 24.92                     | NO                                      |
| <b>Total</b>                      |  |                              |                                     |   | <b>95.69</b>              |   |

**Methodology**

<sup>1</sup> The number of loads are based on washer running time. The maximum number of loads that can be processed depends on the capacities of the washers. All shop towels washed is assumed dried. This scenario is reflected in Table 1 PTE calculations.

Table 2 reflects PTE calculated based on each individual unit capacity for the purposes of 326 IAC 8-1-6 applicability.

<sup>2</sup> The emission factors provided by the source represent test data from a Cintas facility in Cumberland, RI, April 19, 2012, for laundering of shop towels and a safety factor increase of 25%.

Unrestricted Potential to Emit (tpy) = Maximum Capacity Pounds of Soiled Shop Towels (lb of SST)\*Maximum Loads per year \* EF (lb/1000 SST) / (2000 tons per lb \*1000)

Limited SST (lb/yr) = 95 (tons VOC/yr) / uncontrolled unlimited sourcewide PTE (tons/yr) \* unlimited SST washed (lb/yr)

**VOC Emissions From Washers, Dryers and Wastewater Treatment Plant**  
**Appendix A: Emissions Calculations**

**Company Name:** Cintas  
**Address City IN Zip:** 3201 Brooklyn Ave., Fort Wayne, IN 46809  
**Permit Number:** F003-33712-00397  
**SIC Code:** 7218  
**Reviewer:** APT  
**Application Date:** 9/30/2013

| Compound (HAP)           | Facility-wide Emission Factor <sup>1</sup> (lb/lb) | Unrestricted  |                                  |  | Limited  |                               |                                     |
|--------------------------|--|---|----------------------------------|--|--|-------------------------------|-------------------------------------|
|                          |  | Facility-wide potential pounds of soiled shop towels (lb of SST/yr) | Facility-wide PTE HAPs (tons/yr) | Total Facility-wide PTE HAPs (tons/yr) | Sourcewide Limited pounds of soiled shop towels (lb of SST/yr) | Sourcewide PTE HAPs (tons/yr) | Total Sourcewide PTE HAPs (tons/yr) |
| 2,2,4 - Trimethylpentane | 2.45E-05   | 24,382,000  | 0.30                             | 15.09                                  | 22,352,941   | 0.27                          | 13.83                               |
| Chloromethane            | 7.85E-07   |   | 0.01                             |  |  | 0.01                          |                                     |
| Methylene Chloride       | 2.64E-05   |   | 0.32                             |  |  | 0.30                          |                                     |
| Chloroform               | 1.32E-05   |   | 0.16                             |  |  | 0.15                          |                                     |
| Trichloroethylene        | 2.74E-06   |   | 0.03                             |  |  | 0.03                          |                                     |
| Tetrachloroethylene      | 4.91E-04   |   | 5.99                             |  |  | 5.49                          |                                     |
| Benzene                  | 4.10E-06   |   | 0.05                             |  |  | 0.05                          |                                     |
| Toluene                  | 2.56E-04   |   | 3.12                             |  |  | 2.86                          |                                     |
| Ethyl Benzene            | 6.66E-05   |   | 0.81                             |  |  | 0.74                          |                                     |
| Styrene                  | 2.37E-06   |   | 0.03                             |  |  | 0.03                          |                                     |
| Hexane                   | 1.49E-05   |   | 0.18                             |  |  | 0.17                          |                                     |
| Xylene                   | 3.35E-04   |   | 4.08                             |  |  | 3.74                          |                                     |

<sup>1</sup> The facility-wide emission factor represents emissions from the WWTP, the dryers, and the washers. The facility-wide emission factor is based on stack test at Cintas facility in Cumberland, RI, April 19, 2012 and includes a 25% compliance assurance factor.

**Methodology**

Unrestricted Potential to Emit (tpy) = Facility-wide potential Pounds of Soiled Shop Towels (lb of SST/yr) \* EF (lb/lb SST) / (2000 tons per lb)

Limited Potential to Emit (tpy) = Facility-wide potential Pounds of Soiled Shop Towels (lb of SST/yr) \* EF (lb/lb SST) / (2000 tons per lb)

**Appendix A: Emissions Calculations**  
**PM Emissions - Dryers**

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**Company Name:** Cintas  
**Address City IN Zip:** 3201 Brooklyn Ave., Fort Wayne, IN 46809  
**Permit Number:** F003-33712-00397  
**SIC Code:** 7218  
**Reviewer:** APT  
**Application Date:** 9/30/2013

|  |       |
|--|-------|
| <b>Dryer Duration (hr)</b><br>=        | 0.75  |
| <b>Maximum No. of Loads (annual) =</b> | 11680 |

| Dryer ID                       | Capacity Pounds of Dry Shop Towels (lb of Shop | Emission Factor (lb PM/lb of shop towel) <sup>3</sup> | Control Efficiency % | Potential to Emit after Controls (tons per | Potential to Emit After Controls (lb/hr) | Uncontrolled Potential to Emit (tons per year) | Uncontrolled Potential to Emit (lb/hr) | Process Weight Rate (tons/hr) <sup>1</sup> | Emission Limit under 326 IAC 6-3-2(e) |
|--------------------------------|--|---|----------------------|--|--|--|--|--|---------------------------------------|
| EU10                           | 500  | 0.0019  | 85%                  | 0.83                                       | 0.19                                     | 5.548  | 1.27                                   | 0.33                                       | 1.96                                  |
| EU11                           | 500  | 0.0019  | 85%                  | 0.83                                       | 0.19                                     | 5.548  | 1.27                                   | 0.33                                       | 1.96                                  |
| EU12                           | 500  | 0.0019  | 85%                  | 0.83                                       | 0.19                                     | 5.548  | 1.27                                   | 0.33                                       | 1.96                                  |
| EU13                           | 500  | 0.0019  | 85%                  | 0.83                                       | 0.19                                     | 5.548  | 1.27                                   | 0.33                                       | 1.96                                  |
| EU14                           | 110  | 0.0019  | 85%                  | 0.18                                       | 0.04                                     | 1.22056  | 0.28                                   | 0.07                                       | Not Applicable <sup>2</sup>           |
| <b>Total (tons per year) =</b> |  |   |                      | <b>3.51</b>                                |  | <b>23.413</b>                                  |  |  |                                       |

**Methodology**

Potential to Emit (tons per year) = Max. loads (annual) \* total dryer cap (lb towel) \* EF (lb/lb)/2000

<sup>1</sup> The dry cycle is 45 minutes, therefore process weight rate (lb/hr) = maximum capacity\*60/45 / 2000

<sup>2</sup> 326 IAC 6-3-2 is not applicable to emission units with PTE below 0.551 lb/hr

<sup>3</sup> The emission factor is before controls, resulting from permitting analysis, G & K Services Co. - Montgomery Plant, Montgomery Alabama, Facility No. 209-0100.

**Appendix A: Emissions Calculations**  
**Fugitive PM Emissions - Roads**

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**Company Name:** Cintas  
**Address City IN Zip:** 3201 Brooklyn Ave., Fort Wayne, IN 46809  
**Permit Number:** F003-33712-00397  
**SIC Code:** 7218  
**Reviewer:** APT  
**Application Date:** 9/30/2013

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

| Type                                    | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|------------------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Vehicle (entering plant) (one-way trip) | 50.0                               | 1.0   | 50.0                             | 2.0                               | 100.0                                 | 450                                  | 0.085                              | 4.3                               | 1555.4                           |
| Vehicle (leaving plant) (one-way trip)  | 50.0                               | 1.0   | 50.0                             | 2.0                               | 100.0                                 | 440                                  | 0.083                              | 4.2                               | 1520.8                           |
| Personal vehicles entering              | 90.0                               | 1.0   | 90.0                             | 1.0                               | 90.0                                  | 650                                  | 0.123                              | 11.1                              | 4044.0                           |
| Personal vehicles leaving               | 90.0                               | 1.0   | 90.0                             | 1.0                               | 90.0                                  | 650                                  | 0.123                              | 11.1                              | 4044.0                           |
| <b>Totals</b>                           |                                    |   | <b>280.0</b>                     |                                   | <b>380.0</b>                          |                                      |                                    | <b>30.6</b>                       | <b>11164.3</b>                   |

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor, Ef =  $[k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

|           |       |        |         |   |
|-----------|-------|--------|---------|---|
|           | PM    | PM10   | PM2.5   |   |
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)  |
| W =       | 1.4   | 1.4    | 1.4     | tons = average vehicle weight (provided by source)  |
| sL =      | 2.4   | 2.4    | 2.4     | g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext =  $Ef * [1 - (p/4N)]$   
where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N =  days per year

|                                   |       |       |        |         |
|-----------------------------------|-------|-------|--------|---------|
|                                   | PM    | PM10  | PM2.5  |         |
| Unmitigated Emission Factor, Ef = | 0.034 | 0.007 | 0.0017 | lb/mile |
| Mitigated Emission Factor, Eext = | 0.031 | 0.006 | 0.0015 | lb/mile |
| Dust Control Efficiency =         | 0%    | 0%    | 0%     |         |

| Process                                 | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10 (tons/yr) | Controlled PTE of PM2.5 (tons/yr) |
|---|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|--------------------------------|----------------------------------|-----------------------------------|
| Vehicle (entering plant) (one-way trip) | 0.03                            | 0.01                              | 0.00                               | 0.02                          | 0.00                            | 0.00                             | 0.02                           | 0.00                             | 0.00                              |
| Vehicle (leaving plant) (one-way trip)  | 0.03                            | 0.01                              | 0.00                               | 0.02                          | 0.00                            | 0.00                             | 0.02                           | 0.00                             | 0.00                              |
| Personal vehicles entering              | 0.07                            | 0.01                              | 0.00                               | 0.06                          | 0.01                            | 0.00                             | 0.06                           | 0.01                             | 0.00                              |
| Personal vehicles leaving               | 0.07                            | 0.01                              | 0.00                               | 0.06                          | 0.01                            | 0.00                             | 0.06                           | 0.01                             | 0.00                              |
| <b>Totals</b>                           | <b>0.19</b>                     | <b>0.04</b>                       | <b>0.01</b>                        | <b>0.18</b>                   | <b>0.04</b>                     | <b>0.01</b>                      | <b>0.18</b>                    | <b>0.04</b>                      | <b>0.01</b>                       |

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particle Matter (<2.5 um)  
PTE = Potential to Emit



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

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

TO: Jim Buckman  
Cintas  
27 Whitney Drive  
Milford, OH 45150

DATE: September 4, 2014

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

SUBJECT: Final Decision  
New Source Review & Federally Enforceable State Operating Permit  
003-33712-00397

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:  
Glenn Larsen – VP of Quality & Engineering  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

September 4, 2014

TO: Allen County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Cintas**  
**Permit Number: 003-33712-00397**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 6/13/2013


# Mail Code 61-53

|                            |   |   |  |
|----------------------------|---|---|--|
| IDEM Staff                 | GHOTOPP 9/4/2014<br>Cintas 003-33712-00397 Final  |   | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> |  |

| 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    |                | Jim Buckman Cintas 27 Whitney Dr Milford OH 45150-9784 (Source CAATS) via confirmed delivery                  |         |                 |                            |               |                 |          |          |          |                |         |
| 2    |                | Glenn Larsen VP of Quality & Engineering Cintas 27 Whitney Dr Milford OH 45150 (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    |                | Allen County Public Library 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)                    |         |                 |                            |               |                 |          |          |          |                |         |
| 6    |                | Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)     |         |                 |                            |               |                 |          |          |          |                |         |
| 7    |                | Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party) |         |                 |                            |               |                 |          |          |          |                |         |
| 8    |                | Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)              |         |                 |                            |               |                 |          |          |          |                |         |
| 9    |                | Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)    |         |                 |                            |               |                 |          |          |          |                |         |
| 10   |                | Goodwill Industries of Northwest Indiana Inc 1516 Magnavox Way Fort Wayne IN 46804 (Affected Party)           |         |                 |                            |               |                 |          |          |          |                |         |
| 11   |                | AERL LC PO Box 71216 Clive IA 50325 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 12   |                | Tencal LLC 80 Crude Ln Madison TN 37115 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 13   |                | Silas & Julie Thomas 11819 Honeysuckle Ct Ft Wayne IN 46814 (Affected Party)                                  |         |                 |                            |               |                 |          |          |          |                |         |
| 14   |                | Syd Mathais 1734 High St Ft Wayne IN 46808 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 15   |                | G & L Corporation 3107 Brooklyn Ave Ft Wayne IN 46809 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |

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|---|--|--|--|
| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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|------|----------------|---|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
|      |                |   |         |                  |                            |               |                 |          |          |          | Remarks        |
| 1    |                | Carol Brant 1835 Gruber Ave Ft Wayne IN 46809 (Affected Party)              |         |                  |                            |               |                 |          |          |          |                |
| 2    |                | Ralph & Louise Merz 1823 Gruber Ave Ft Wayne IN 46809 (Affected Party)      |         |                  |                            |               |                 |          |          |          |                |
| 3    |                | John Mosure 1817 Gruber Ave Ft Wayne IN 46809 (Affected Party)              |         |                  |                            |               |                 |          |          |          |                |
| 4    |                | Ameritrust Lending LLC 2042 Broadway Ft Wayne IN 46802 (Affected Party)     |         |                  |                            |               |                 |          |          |          |                |
| 5    |                | Steven Croghan 1809 Gruber Ave Ft Wayne IN 46809 (Affected Party)           |         |                  |                            |               |                 |          |          |          |                |
| 6    |                | David & Addie Croghan 1801 Gruber Ave Ft Wayne IN 46809 (Affected Party)    |         |                  |                            |               |                 |          |          |          |                |
| 7    |                | Payless Properties LLC 2114 Othello Cove Ft Wayne IN 46818 (Affected Party) |         |                  |                            |               |                 |          |          |          |                |
| 8    |                | Carolyn & Helen Meyer 1711 Gruber Ave Ft Wayne in 46809 (Affected Party)    |         |                  |                            |               |                 |          |          |          |                |
| 9    |                | Jeffrey Schultz 1705 Gruber Ave Ft Wayne in 46809 (Affected Party)          |         |                  |                            |               |                 |          |          |          |                |
| 10   |                | Allen & Shelia Tigner 3204 Vesey Ave Ft Wayne in 46809 (Affected Party)     |         |                  |                            |               |                 |          |          |          |                |
| 11   |                | Looea Joan Adams 3208 Vessy Ave Ft Wayne in 46809 (Affected Party)          |         |                  |                            |               |                 |          |          |          |                |
| 12   |                | James & Joyce Doner 4620 Benzinger Dr Ft Wayne in 46816 (Affected Party)    |         |                  |                            |               |                 |          |          |          |                |
| 13   |                | Steven & Mary Barrand 3215 Vesey Ave Ft Wayne in 46809 (Affected Party)     |         |                  |                            |               |                 |          |          |          |                |
| 14   |                | Katherine Ewing 3312 Vesey Ave Ft Wayne in 46809 (Affected Party)           |         |                  |                            |               |                 |          |          |          |                |
| 15   |                | Robert Warner 9930 Kress Rd Roanoake in 46783 (Affected Party)              |         |                  |                            |               |                 |          |          |          |                |

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|------|----------------|--|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
|      |                |  |         |                  |                            |               |                 |          |          |          | Remarks        |
| 1    |                | Jerry & Charlene Cooper 1936 Kinsmoor Ave Ft Wayne in 46809 (Affected Party)         |         |                  |                            |               |                 |          |          |          |                |
| 2    |                | Daniel Lothamer 1534 Dundee Dr New Haven in 46774 (Affected Party)                   |         |                  |                            |               |                 |          |          |          |                |
| 3    |                | Mark, Audrey & John Caudill 1918 Kinsmoor Ave Ft Wayne in 46809 (Affected Party)     |         |                  |                            |               |                 |          |          |          |                |
| 4    |                | Boyd & April Conley 1914 Kinsmoor Ave Ft Wayne in 46809 (Affected Party)             |         |                  |                            |               |                 |          |          |          |                |
| 5    |                | James Thompson 1906 Kinsmoor Ave Ft Wayne in 46809 (Affected Party)                  |         |                  |                            |               |                 |          |          |          |                |
| 6    |                | Grider Investment Properties 311 Stoney Ridge Ct Rock Hill SC 29732 (Affected Party) |         |                  |                            |               |                 |          |          |          |                |
| 7    |                | Juan Vasquez 3405 Laredo Ave Ft Wayne IN 46809 (Affected Party)                      |         |                  |                            |               |                 |          |          |          |                |
| 8    |                | Robert & Olive Voght 1838 Kinsmoor Ave Ft Wayne IN 46809 (Affected Party)            |         |                  |                            |               |                 |          |          |          |                |
| 9    |                | Rodney Cone 2221 Montclair Ave Ft Wayne IN 46808 (Affected Party)                    |         |                  |                            |               |                 |          |          |          |                |
| 10   |                | Randy Ramsey 1830 Kinsmoor Ave Ft Wayne IN 46809 (Affected Party)                    |         |                  |                            |               |                 |          |          |          |                |
| 11   |                | Chris Conner 2235 Longleaf Dr Ft Wayne IN 46814 (Affected Party)                     |         |                  |                            |               |                 |          |          |          |                |
| 12   |                | Karen Nevills 1802 Kinsmoor Ave Ft Wayne IN 46809 (Affected Party)                   |         |                  |                            |               |                 |          |          |          |                |
| 13   |                | Marcos & Joan Botas 1730 Kinsmoor Ave Ft Wayne IN 46809 (Affected Party)             |         |                  |                            |               |                 |          |          |          |                |
| 14   |                | Randy Jahn 4755 N Airport Rd Columbia City IN 46725 (Affected Party)                 |         |                  |                            |               |                 |          |          |          |                |
| 15   |                | David & Sharon Doan 1726 Kinsmoor Ave Ft Wayne IN 46809 (Affected Party)             |         |                  |                            |               |                 |          |          |          |                |

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|      |                |  |         |                 |                            |               |                 |          |          |          | Remarks        |
| 1    |                | Ron & Linda Vlazer 1722 Kinsmoor Ave Ft Wayne IN 46809 (Affected Party)                            |         |                 |                            |               |                 |          |          |          |                |
| 2    |                | Molly Heidinger 1714 Kinsmoor Ave Ft Wayne IN 46807 (Affected Party)                               |         |                 |                            |               |                 |          |          |          |                |
| 3    |                | Steve Arnett 4026 Elmcrest Dr Ft Wayne IN 46804 (Affected Party)                                   |         |                 |                            |               |                 |          |          |          |                |
| 4    |                | Allen County Community Development Corp 200 e Berry St, Ste 170 Ft Wayne IN 46802 (Affected Party) |         |                 |                            |               |                 |          |          |          |                |
| 5    |                |  |         |                 |                            |               |                 |          |          |          |                |
| 6    |                |  |         |                 |                            |               |                 |          |          |          |                |
| 7    |                |  |         |                 |                            |               |                 |          |          |          |                |
| 8    |                |  |         |                 |                            |               |                 |          |          |          |                |
| 9    |                |  |         |                 |                            |               |                 |          |          |          |                |
| 10   |                |  |         |                 |                            |               |                 |          |          |          |                |
| 11   |                |  |         |                 |                            |               |                 |          |          |          |                |
| 12   |                |  |         |                 |                            |               |                 |          |          |          |                |
| 13   |                |  |         |                 |                            |               |                 |          |          |          |                |
| 14   |                |  |         |                 |                            |               |                 |          |          |          |                |
| 15   |                |  |         |                 |                            |               |                 |          |          |          |                |

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|---|--|--|--|
| Total number of pieces Listed by Sender<br><br><b>4</b> | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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