



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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: October 2, 2014

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

Source Name: Cintas

Permit Level: MSOP

Permit Number: 097-33713-00719

Source Location: 7258 Georgetown Road, Indianapolis, 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 33713.

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
Governor

Thomas W. Easterly
Commissioner

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

Cintas
7258 Georgetown Road
Indianapolis, Indiana 46268

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.


Operation Permit No.: M097-33713-00719	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2014 Expiration Date: October 2, 2019

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SECTION ASOURCE 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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary industrial laundry facility.

Source Address:	7258 Georgetown Road, Indianapolis, Indiana 46268
General Source Phone Number:	(513) 965-4932
SIC Code:	7218
County Location:	Marion Outside Center, Perry, and Wayne Townships
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) natural gas-fired boilers, identified as EU1 and EU2, constructed in 1995, each with a maximum heat input capacity of 4.185 MMBtu/hr, using no controls, and exhausting through a stack;
- (b) One (1) washer, identified as EU3, constructed in 1995, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (c) One (1) washer, identified as EU4, constructed in 1995, with a maximum capacity of 156 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (d) One (1) pony washer, identified as EU5, constructed in 1995, with a maximum capacity of 81 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (e) One (1) washer, identified as EU6, constructed in 2007, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (f) One (1) washer, identified as EU7, constructed in 2007, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (g) One (1) natural gas-fired dryer, identified as EU8, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (h) One (1) natural gas-fired dryer, identified as EU9, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

- (l) One (1) natural gas-fired dryer, identified as EU10, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (m) One (1) natural gas-fired dryer, identified as EU11, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (n) One (1) natural gas-fired dryer, identified as EU12, constructed in 2005, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (o) One (1) natural gas-fired dryer, identified as EU13, constructed in 2007, with a maximum heat input capacity of 1.4 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (o) One (1) natural gas-fired dryer, identified as EU14, constructed in 1995, with a maximum heat input capacity of 0.37 MMBTU/hr, and a maximum capacity of 150 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (o) One (1) natural gas-fired dryer, identified as EU15, constructed in 1995, with a maximum heat input capacity of 0.18 MMBTU/hr, and a maximum capacity of 75 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (s) One (1) natural gas-fired steam tunnel, identified as EU16, constructed in 1995, with a maximum heat input capacity of 1.5 MMBtu/hr, using no controls, and exhausting through a stack.
- (f) One (1) tunnel washer, identified as EU17, constructed in 1995, with a maximum capacity of 138 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (p) One (1) wastewater treatment plant, identified as EU18, constructed in 1995, with a maximum capacity of 200 gallons per minute, using no controls, and exhausting inside the building;
- (q) Several natural gas-fired small HVAC heaters, with a combined maximum heat input capacity of 1.0 MMBtu/hr, using no controls, and exhausting outside the building; and
- (r) Fugitive particulate emissions from paved roads and parking lots. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

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

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 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, M097-33713-00719, 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.5 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.6 Enforceability

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.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

- (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.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- (a) All terms and conditions of permits established prior to M097-33713-00719 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.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 permitted 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.20 Credible Evidence [326 IAC 1-1-6]

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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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]

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]

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]

- (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.

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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]

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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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. 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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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
- (b) 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.
- (c) 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.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) washer, identified as EU3, constructed in 1995, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;

One (1) washer, identified as EU4, constructed in 1995, with a maximum capacity of 156 pounds of soiled laundry per load, using no controls, and exhausting inside the building;

One (1) pony washer, identified as EU5, constructed in 1995, with a maximum capacity of 81 pounds of soiled laundry per load, using no controls, and exhausting inside the building;

One (1) washer, identified as EU6, constructed in 2007, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;

One (1) washer, identified as EU7, constructed in 2007, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;

One (1) natural gas-fired dryer, identified as EU8, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU9, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU10, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU11, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU12, constructed in 2005, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU13, constructed in 2007, with a maximum heat input capacity of 1.4 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU14, constructed in 1995, with a maximum heat input capacity of 0.37 MMBTU/hr, and a maximum capacity of 150 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

One (1) natural gas-fired dryer, identified as EU15, constructed in 1995, with a maximum heat input capacity of 0.18 MMBTU/hr, and a maximum capacity of 75 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer 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 2-6.1-5(a)(1)]

D.1.1 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate matter emissions from each dryer EU8 through EU13 shall not exceed the following:

Emission Unit	Process Rate Weight (tons per hour)	PM Emission Limit (lb/hr)
EU8	0.16	1.20
EU9	0.16	1.20
EU10	0.16	1.20
EU11	0.16	1.20
EU12	0.16	1.20
EU13	0.30	1.83

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

$$E = 4.10 * P^{0.67}$$

Where E = rate of emissions in pounds per hour.
P = process weight rate in tons per hour.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Two (2) natural gas-fired boilers, identified as EU1 and EU2, constructed in 1995, each with a maximum heat input capacity of 4.185 MMBtu/hr, using 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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the two (2) natural gas-fired boilers, identified as EU1 and EU2, shall not exceed 0.6 pounds per million BTU, each.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Cintas
Address:	7258 Georgetown Road
City:	Indianapolis, Indiana 46268
Phone #:	(513) 965-4932
MSOP #:	M097-33713-00719

I hereby certify that Cintas is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that Cintas is :

☐ in compliance with the requirements of
MSOP M097-33713-00719.

☐ not in compliance with the requirements of
MSOP M097-33713-00719.

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

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Cintas
7258 Georgetown Road
Indianapolis, Indiana 46268

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that Cintas 7258 Georgetown Road, Indianapolis, Indiana 46268, has constructed and will operate a industrial laundry facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 30, 2013 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M097-33713-00719, Plant ID No. 097-00719 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

**New Source Construction and Minor Source
Operating Permit
OFFICE OF AIR QUALITY**

**Cintas
7258 Georgetown Road
Indianapolis, IN 46268**

Attachment A

to

M097-33713-00719

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 Construction and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	Cintas
Source Location:	7258 Georgetown Road, Indianapolis, Indiana 46268
County:	Marion (Pike Township)
SIC Code:	7218 (Industrial Launderers)
Operation Permit No.:	M097-33713-00719
Permit Reviewer:	Donald McQuigg

On September 30, 2013, the Office of Air Quality (OAQ) received an application from Cintas related to the operation of an existing stationary industrial laundry facility. Additional information was received on March 27, 2014.

Background Information

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 the 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 is as follows:

- (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 a 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 gallons per minute. The treated wastewater is then discharged to the local sewer system under an industrial wastewater permit.

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

Note: The number of loads is based on a washer's running time. The maximum number of loads that can be processed depends on the capacity of each washer. All soiled shop towels (SST) washed are assumed to be dried.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Pike Township in Marion County.

Pollutant	Designation
SO ₂	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective July 11, 2013, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Marion County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Marion 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 the 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 industrial laundry. The source consists of the following unpermitted emission units and control devices:

- (a) Two (2) natural gas-fired boilers, identified as EU1 and EU2, constructed in 1995, each with a maximum heat input capacity of 4.185 MMBtu/hr, using no controls, and exhausting through a stack;
- (b) One (1) washer, identified as EU3, constructed in 1995, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (c) One (1) washer, identified as EU4, constructed in 1995, with a maximum capacity of 156 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (d) One (1) pony washer, identified as EU5, constructed in 1995, with a maximum capacity of 81 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (e) One (1) washer, identified as EU6, constructed in 2007, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (f) One (1) washer, identified as EU7, constructed in 2007, with a maximum capacity of 563 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (g) One (1) natural gas-fired dryer, identified as EU8, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;

- (h) One (1) natural gas-fired dryer, identified as EU9, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (l) One (1) natural gas-fired dryer, identified as EU10, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (m) One (1) natural gas-fired dryer, identified as EU11, constructed in 1995, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (n) One (1) natural gas-fired dryer, identified as EU12, constructed in 2005, with a maximum heat input capacity of 1.5 MMBTU/hr, and a maximum capacity of 240 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (o) One (1) natural gas-fired dryer, identified as EU13, constructed in 2007, with a maximum heat input capacity of 1.4 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (o) One (1) natural gas-fired dryer, identified as EU14, constructed in 1995, with a maximum heat input capacity of 0.37 MMBTU/hr, and a maximum capacity of 150 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (o) One (1) natural gas-fired dryer, identified as EU15, constructed in 1995, with a maximum heat input capacity of 0.18 MMBTU/hr, and a maximum capacity of 75 pounds of clean dry laundry per load, using no controls, and exhausting through a dryer stack;
- (s) One (1) natural gas-fired steam tunnel, identified as EU16, constructed in 1995, with a maximum heat input capacity of 1.5 MMBtu/hr, using no controls, and exhausting through a stack.
- (f) One (1) tunnel washer, identified as EU17, constructed in 1995, with a maximum capacity of 138 pounds of soiled laundry per load, using no controls, and exhausting inside the building;
- (p) One (1) wastewater treatment plant, identified as EU18, constructed in 1995, with a maximum capacity of 200 gallons per minute, using no controls, and exhausting inside the building;
- (q) Several natural gas-fired small HVAC heaters, with a combined maximum heat input capacity of 1.0 MMBtu/hr, using no controls, and exhausting outside the building; and
- (r) Fugitive particulate emissions from paved roads and parking lots. [326 IAC 6-4]

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 – MSOP

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	21.15
PM ₁₀ ⁽¹⁾	21.50
PM _{2.5} ⁽¹⁾	21.48
SO ₂	0.05
NO _x	8.73
VOC	78.85
CO	7.33
GHGs as CO ₂ e	10,533

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM_{2.5}), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
2,2,4 - Trimethylpentane	0.14
Chloromethane	0.00
Methylene Chloride	0.15
Chloroform	0.07
Trichloroethylene	0.02
Tetrachloroethylene	2.76
Benzene	0.02
Toluene	1.44
Ethyl Benzene	0.37
Styrene	0.01
Hexane	0.08
Xylene	1.88
TOTAL HAPs	6.96

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject-to-regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) 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 natural gas-fired boilers, identified as EU1 and EU2, are not subject to this NSPS because each boiler has a heat input rating of 4.185 MMBtu/hr which is less than 10 MMBtu/hr.

- (b) 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)

- (c) 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 natural gas-fired boilers, identified as EU1 and EU2, are not subject to this area source NESHAP because they are not one of the subcategories listed in the rule.

- (d) 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)

- (e) 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 less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-6 (MSOP)
MSOP applicability is discussed under the PTE of the Entire Source section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
The source is not subject to the requirements of PSD because the potential to emit of each criteria pollutant is less than PSD thresholds.

- (c) 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 entire 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.
- (d) 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.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the fugitive paved road emissions do not have potential fugitive particulate emissions greater than twenty-five (25) tons per year.

Boilers EU1 and EU2

- (h) 326 IAC 6-2-4 (Particulate Emission Limitations for Source of Indirect Heating)
The natural gas-fired boilers, identified as EU1 and EU2, are subject to the provisions of 326 IAC 6-2-4 because the boilers are a source of indirect heat and were constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4, particulate emissions from each boiler shall not exceed 0.6 pounds of particulate matter (PM) per million Btu (0.6 lb PM/MMBtu) heat input, since the heat input capacity is less than 10.0 MMBtu/hr.
- (i) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
 - (a) The natural gas-fired boilers, identified as EU1 and EU2, are not subject to the requirements of 326 IAC 6.5 because the boilers only burn natural gas. Pursuant to 326 IAC 6.5-1-1(b), particulate emissions limitations shall not be established under 326 IAC 6.5 for combustion units, as long as they continue to burn only natural gas; and
 - (b) Pursuant to 326 IAC 6.5-1-1(a)(2), the natural gas-fired boilers, identified as EU1 and EU2, are not subject to 326 IAC 6.5 because they have the potential to emit particulate matter of less than one hundred (100) tons per year and have actual particulate matter emissions of less than ten (10) tons per year.

Washers EU3 through EU7 and EU17

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The washers EU3 through EU7 and EU17 are not subject to 326 IAC 6-3-2 because the washers are wet processes and do not have the potential to emit particulate.
- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The washers EU3 through EU7 and EU17 are not subject to the requirements of 326 IAC 8-1-6 because each washer has the potential to emit VOC of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

Dryers EU8 through EU15

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired dryers EU8 through EU15 are subject to 326 IAC 6-3-2 because each dryer has the potential to emit particulate.

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

$$E = 4.10 \cdot P^{0.67}$$

Where E = rate of emissions in pounds per hour.
P = process weight rate in tons per hour.

Pursuant to 326 IAC 6-3-2, particulate emissions from each dryer shall not exceed the following:

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PTE (lb/hr)	Allowed Emissions under 326 IAC 6-3-2 (lb/hr)	Control Device Needed?
EU8	0.16	0.61	1.20	No
EU9	0.16	0.61	1.20	No
EU10	0.16	0.61	1.20	No
EU11	0.16	0.61	1.20	No
EU12	0.16	0.61	1.20	No
EU13	0.30	1.14	1.83	No
EU14	0.10	0.38	Not Applicable	No
EU15	0.05	0.19	Not Applicable	No

Since the potential to emit from each dryer is less than the limited emission rates under 326 IAC 6-3-2, the source can comply with each limit without the use of a control device. EU14 and EU15 are exempt from the requirements of 326 IAC 6-3-2 because the uncontrolled PTE PM is less than 0.551 lbs/hr.

- (m) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
- (a) Pursuant to 326 IAC 6.5-1-1(a)(1), the natural gas-fired dryers, identified as EU8 through EU15, are not subject to 326 IAC 6.5 because, even though the dryers are located in Marion County, they are not specifically listed in the rule; and
- (b) Pursuant to 326 IAC 6.5-1-1(a)(2), the natural gas-fired dryers, identified as EU8 through EU15, are not subject to 326 IAC 6.5 because they have the potential to emit particulate matter of less than one hundred (100) tons per year and have actual particulate matter emissions of less than ten (10) tons per year.

- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired dryers EU8 through EU15 are not subject to the requirements of 326 IAC 8-1-6 because each dryer has the potential to emit VOC of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (o) There are no other 326 IAC 8 Rules that are applicable to the source.

Wastewater Treatment Plant EU18

- (p) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The wastewater treatment plant EU18 is not subject to the requirements of 326 IAC 8-1-6 because it has the potential to emit VOC of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

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 Construction and MSOP No. M097-33713-00719. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Donald McQuigg 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) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: M097-33713-00719
SIC Code: 7218
Reviewer: Donald McQuigg
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 EU3 - EU7	-----	-----	-----	-----	-----	2.98	-----	-----	6.96	2.76	Tetrachloroethylene
Dryers EU8-EU15	20.81	20.81	20.81	-----	-----	62.85	-----	-----			
Wastewater Treatment Plant EU18	-----	-----	-----	-----	-----	12.54	-----	-----			
Natural Gas Combustion	0.17	0.66	0.66	0.05	8.73	0.48	7.33	10,533	0.16	0.16	Hexane
Total Non-Fugitive Emissions	20.97	21.47	21.47	0.05	8.73	78.85	7.33	10,533	7.12	2.76	Tetrachloroethylene
Fugitive Emissions											
Paved Roads ⁽¹⁾ (Fugitive)	0.18	0.04	0.01	-----	-----	-----	-----	-----	-----	-----	-----
Total Fugitive Emissions	0.18	0.04	0.01	-----	-----	-----	-----	-----	-----	-----	-----
Total Source-wide PTE (tons/year)	21.15	21.50	21.48	0.05	8.73	78.85	7.33	10,533	7.12	2.76	Tetrachloroethylene
Title V Permit Threshold	NA	100	100	100	100	100	100	100,000	25	10	

⁽¹⁾ Mitigated

Emission Unit	EU -ID	Capacity - MMBTU/hr
Boiler	EU1	4.185
Boiler	EU2	4.185
Steam Tunnel	EU16	1.5
Dryer	EU8	1.5
Dryer	EU9	1.5
Dryer	EU10	1.5
Dryer	EU11	1.5
Dryer	EU12	1.5
Dryer	EU13	1.4
Dryer	EU14	0.37
Dryer	EU15	0.18
HVAC Units	various	1.0
Total		20.32

Appendix A: Emissions Calculations

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Natural Gas Combustion Only MM BTU/HR <100

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: M097-33713-00719
SIC Code: 7218
Reviewer: Donald McQuigg
Application Date: 9/30/2013

Total Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
20.3	1020	174.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.17	0.66	0.66	0.05	8.73	0.48	7.33

*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 HAPs
	Benzene	Dichlorobenz	Formaldehyde	Hexane	Toluene	Total - Organics	0.16
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.642E-01	Worst HAP
Potential Emission in tons/yr	1.832E-04	1.047E-04	6.544E-03	1.571E-01	2.967E-04		Hexane 0.16

Emission Factor in lb/MMcf	HAPs - Metals						Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	4.782E-04	
Potential Emission in tons/yr	4.363E-05	9.598E-05	1.222E-04	3.316E-05	1.832E-04		

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
Potential Emission in tons/yr	10,471	0.2	0.2
Summed Potential Emissions in tons/yr	10,471		
CO2e Total in tons/yr	10,533		

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 (25) + N2O Potential Emission ton/yr x N2O GWP (298).

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

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Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: M097-33713-00719
SIC Code: 7218
Reviewer: Donald McQuigg
Application Date: 9/30/2013

Emission Unit	Maximum Capacity Pounds of Soiled Shop Towels (lb of SST/load)	Wash/Dry Cycle Duration (hr)	Maximum Loads per year ¹	Emission Factor (lb VOC/1000 lb SST) ²	Unrestricted VOC PTE (tons/yr)	Is this facility PTE >= 25 tpy (yes/no)	Facility Type Total (tons/yr)
Washers							2.981
EU3	563	1.5	5840	0.53	0.8712988	NO	
EU4	156	1.5	5840	0.53	0.2414256	NO	
EU5	81	1.5	5840	0.53	0.1253556	NO	
EU6	563	1.5	5840	0.53	0.8712988	NO	
EU7	563	1.5	5840	0.53	0.8712988	NO	
EU17 ³	NA	NA	NA	NA	NA	NO	
Dryers Max. Dry Weight							62.853
EU8	240	0.75	11680	5.74	8.045184	NO	
EU9	240	0.75	11680	5.74	8.045184	NO	
EU10	240	0.75	11680	5.74	8.045184	NO	
EU11	240	0.75	11680	5.74	8.045184	NO	
EU12	240	0.75	11680	5.74	8.045184	NO	
EU13	450	0.75	11680	5.74	15.08472	NO	
EU14	150	0.75	11680	5.74	5.03	NO	
EU15	75	0.75	11680	5.74	2.51	NO	
EU16 ³	NA	NA	NA	NA	NA	NO	
Wastewater Treatment Plant							12.54
EU18	1926	NA	5840	2.23	12.54	NO	
Total Uncontrolled VOC					78.38		

¹ 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.

² 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%.

³ The tunnel washer (EU17) is not designed to wash shop towels. The steam tunnel (EU16) is dedicated to the tunnel washer.

Methodology

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

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

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: M097-33713-00719
SIC Code: 7218
Reviewer: Donald McQuigg
Application Date: 9/30/2013

		Unrestricted		
Compound (HAP)	Facility-wide Emission Factor ¹ (lb/lb)	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)
2,2,4 - Trimethylpentane	2.45E-05	11,247,840	0.14	6.96
Chloromethane	7.85E-07		0.00	
Methylene Chloride	2.64E-05		0.15	
Chloroform	1.32E-05		0.07	
Trichloroethylene	2.74E-06		0.02	
Tetrachloroethylene	4.91E-04		2.76	
Benzene	4.10E-06		0.02	
Toluene	2.56E-04		1.44	
Ethyl Benzene	6.66E-05		0.37	
Styrene	2.37E-06		0.01	
Hexane	1.49E-05		0.08	
Xylene	3.35E-04		1.88	

¹ 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

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: M097-33713-00719
SIC Code: 7218
Reviewer: Donald McQuigg
Application Date: 9/30/2013

Dryer Duration (hr) =	0.75
Maximum No. of Loads (annual) =	11680

Dryer ID	Capacity Pounds of Dry Shop Towels (lb of Shop)	Emission Factor (lb PM/lb of shop towel) ³	Control Efficiency %	Potential to Emit after Controls (tons/year)	Potential to Emit After Controls (lb/hr)	Uncontrolled Potential to Emit (tons/year)	Uncontrolled Potential to Emit (lb/hr)	Process Weight Rate (tons/hr) ¹	Emission Limit under 326 IAC 6-3-2(e)	Control Device Required to Comply? Yes/No
EU8	240	0.0019	85%	0.40	0.09	2.66304	0.61	0.16	1.20	NO
EU9	240	0.0019	85%	0.40	0.09	2.66304	0.61	0.16	1.20	NO
EU10	240	0.0019	85%	0.40	0.09	2.66304	0.61	0.16	1.20	NO
EU11	240	0.0019	85%	0.40	0.09	2.66304	0.61	0.16	1.20	NO
EU12	240	0.0019	85%	0.40	0.09	2.66304	0.61	0.16	1.20	NO
EU13	450	0.0019	85%	0.75	0.17	4.9932	1.14	0.30	1.83	NO
EU14	150	0.0019	85%	0.25	0.06	1.6644	0.38	0.10	Not Applicable ⁴	NO
EU15	75	0.0019	85%	0.12	0.03	0.8322	0.19	0.05	Not Applicable ⁴	NO
Total (tons per year) =				3.12		20.805				

Methodology

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

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

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

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

⁴ The PM emissions before control are less than 0.551 lbs/hr; therefore, this unit is exempt from the requirements of 326 IAC 6-3-2.

Appendix A: Emissions Calculations
Fugitive PM Emissions - Roads

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: M097-33713-00719
SIC Code: 7218
Reviewer: Donald McQuigg
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
Totals			280.0		380.0			30.6	11164.3

Average Vehicle Weight Per Trip = 1.4 tons/trip
Average Miles Per Trip = 0.15 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^2 = 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 = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 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
Totals	0.19	0.04	0.01	0.18	0.04	0.01	0.18	0.04	0.01

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



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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: October 2, 2014

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

SUBJECT: Final Decision
MSOP
097-33713-00719

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 and Engineering / Cintas
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 2, 2014

TO: Pike Branch 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: 097-33713-00719

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	AWELLS 10/2/2014 Cintas 097-33713-00719 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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2		Glenn Larsen VP of Quality & Engineering Cintas 27 Whitney Dr Milford OH 45150 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Pike Branch Library 6525 Zionsville Road Indianapolis IN 46268 (Library)										
7		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)										
8		Wilber Partnership 7240 Georgetown Rd Indianapolis IN 46268 (Affected Party)										
9		Powers, Challen & Steven 7260 Georgetown Rd Indianapolis in 46268 (Affected Party)										
10		Whitman Properties LLC 7264 Georgetown Rd Indianapolis in 46268 (Affected Party)										
11		ZDAG LLC 7270 Georgetown Rd Indianapolis in 46268 (Affected Party)										
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