



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

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Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Minor Source Operating Permit (MSOP)

for Cintas in Marion County

Significant Permit Revision No.: 097-37091-00719

The Indiana Department of Environmental Management (IDEM) has received an application from Cintas, located at 7258 Georgetown Road, Indianapolis, Indiana 46268, for a significant revision of its MSOP issued on October 2, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Cintas to make certain changes at its existing source. Cintas has applied for a revision relating to the addition of six (6) new washers, four (4) new dryers, and operational increase in the amount of wastewater processed by the wastewater treatment plant and the removal of three (3) washers, six (6) dryers, and a one (1) tunnel washer.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Pike Public Library
6525 Zionsville Rd.
Indianapolis, IN 46268

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 097-37091-00719 in all correspondence.

Comments should be sent to:

Monica Dick
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-1243
Or dial directly: (317) 234-1243
Fax: (317) 232-6749 attn: Monica Dick
E-mail: mdick@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Monica Dick of my staff at the above address.



Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality



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Steve Schoenlein
Cintas
27 Whitney Drive
Milford, IN, 45150

Re: 097-37091-00719
Significant Revision to
M097-33713-00719

Dear Steve Schoenlein:

Cintas was issued a Minor Source Operating Permit (MSOP) No. M097-33713-00719 on October 2, 2014 for a stationary industrial laundry facility located at 7258 Georgetown Road, Indianapolis, Indiana 46268. On April 18, 2016, the Office of Air Quality (OAQ) received an application from the source requesting a revision relating to the addition of six (6) new washers, four (4) new dryers, and operational increase in the amount of wastewater processed by the wastewater treatment plant and the removal of three (3) washers, six (6) dryers, and a one (1) tunnel washer. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit

revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as revised. The permit references the below listed attachment. Since this attachments has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachments with this revision:

Attachment A: Industrial Laundry Definitions

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Monica Dick of my staff at 317-234-1243 or 1-800-451-6027, and ask for extension 4-1243.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

cc: File - Marion County
Marion County Public Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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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: Original Signed Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2014 Expiration Date: October 2, 2019

First Significant Permit Revision No.: 097-37091-00719	
Issued by: Josiah K. Balogun, Section Chief, Permits Branch Office of Air Quality	Issuance Date: Expiration Date: October 2, 2019

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 (Industrial Launderers)
County Location:	Marion (Pike Township)
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) Eight (8) washers, using no controls, and exhausting inside the building, as follows:
 - (1) One (1) washer, identified as EU4, constructed in 1995, with a maximum capacity of 156 pounds of soiled laundry per load;
 - (2) One (1) pony washer, identified as EU5, constructed in 1995, with a maximum capacity of 81 pounds of soiled laundry per load;
 - (3) One (1) washer, identified as EU19, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;
 - (4) One (1) washer, identified as EU20, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;
 - (5) One (1) washer, identified as EU21, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;
 - (6) One (1) washer, identified as EU22, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;
 - (7) One (1) washer, identified as EU23, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;
 - (8) One (1) washer, identified as EU24, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;

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- (c) Six (6) natural gas-fired dryers, using no controls, and exhausting through a dryer stack, as follows:
- (1) 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;
 - (2) 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;
 - (3) One (1) natural gas-fired dryer, identified as EU25, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
 - (4) One (1) natural gas-fired dryer, identified as EU26, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
 - (5) One (1) natural gas-fired dryer, identified as EU27, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load; and
 - (6) One (1) natural gas-fired dryer, identified as EU28, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load.
- (d) 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.
- (e) 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;
- (f) 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
- (g) Fugitive particulate emissions from paved roads and parking lots. [326 IAC 6-4]

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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.

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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.

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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

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- (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

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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.

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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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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.

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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.

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- (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.

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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.

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- (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

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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.

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SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (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.
- (c) Six (6) natural gas-fired dryers, using no controls, and exhausting through a dryer stack, as follows:
 - (1) 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;
 - (2) 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;
 - (3) One (1) natural gas-fired dryer, identified as EU25, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
 - (4) One (1) natural gas-fired dryer, identified as EU26, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
 - (5) One (1) natural gas-fired dryer, identified as EU27, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load; and
 - (6) One (1) natural gas-fired dryer, identified as EU28, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load.
- (d) 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) 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

(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 Limitations Except Lake County [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) emissions shall not exceed the limit as follows:

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emission unit description	emission unit ID	limit (grains/dscf)
boiler	EU1	0.01
boiler	EU1	0.01

- (b) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from shall not exceed the limit as follows:

emission unit description	emission unit ID	limit (grains/dscf)
dryers	EU14	0.03
	EU15	0.03
	EU25	0.03
	EU26	0.03
	EU27	0.03
	EU28	0.03
natural gas-fired steam tunnel	EU16	0.03
each HVAC heater	NA	0.03

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

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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.

I hereby certify that Cintas is :

no longer in operation.

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:

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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

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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:

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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)

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

Technical Support Document (TSD) for Significant Permit Revision to a
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
Operation Permit Issuance Date: October 2, 2014
Significant Permit Revision No.: 097-37091-00719
Permit Reviewer: Monica Dick

On April 18, 2016, the Office of Air Quality (OAQ) received an application from Cintas related to a modification to an existing industrial laundry facility.

Existing Approvals

The source was issued MSOP No. M097-33713-00719 on October 2, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Marion County (Pike Township).

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

- (a) The fugitive emissions of regulated pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

Status of the Existing Source

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, prior to the proposed revision:

This PTE table is from the TSD or Appendix A of M097-33713-00719 on October 2, 2014.

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

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Cintas on April 18, 2016, relating to the addition of six (6) new washers, four (4) new dryers, and operational increase in the amount of wastewater processed by the wastewater treatment plant and the removal of three (3) washers, six (6) dryers, and a one (1) tunnel washer.

The following is a list of the new emission units and pollution control devices:

- (a) **Six (6) washers, using no controls, and exhausting inside the building, consisting of the following:**
 - ...
 - (1) **One (1) washer, identified as EU19, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (2) **One (1) washer, identified as EU20, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (3) **One (1) washer, identified as EU21, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (4) **One (1) washer, identified as EU22, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (5) **One (1) washer, identified as EU23, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (6) **One (1) washer, identified as EU24, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
- (b) **Four (4) natural gas-fired dryers, using no controls, and exhausting through a dryer stack, as follows:**
 - ...
 - (1) **One (1) natural gas-fired dryer, identified as EU25, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;**

- (2) One (1) natural gas-fired dryer, identified as EU26, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
- (3) One (1) natural gas-fired dryer, identified as EU27, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
- (4) One (1) natural gas-fired dryer, identified as EU28, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;

...

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of Proposed Revision (tons/year)								Worst Single Tetrachloroethylene HAP
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	
Six (6) New Washers (EU-19-EU24)	-----	-----	-----	-----	-----	4.36	-----	15.27	6.05
Four (4) New Dryers (EU25-EU28)	19.97	19.97	19.97	-----	-----	60.34	-----		
Operational Change - Wastewater Treatment Plant	-----	-----	-----	-----	-----	22.00	-----		
New Dryers - Combustion	0.09	0.37	0.37	0.03	4.81	0.26	4.04	0.09	0.09
Total PTE of Proposed Revision	20.06	20.06	20.06	0.03	4.81	86.96	4.04	15.36	6.05
negl. = negligible									

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the construction of new emission units with a potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants VOC.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								Worst Single Tetrachloroethylene HAP		
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs			
Eight (8) Washers (EU4, EU5, and EU19- EU24)	-----	-----	-----	-----	-----	2.98 5.59	-----	-----	-----	6.96 16.34	2.76 6.47
Six (6) Dryers(EU14, EU15, and EU25-EU28)	20.81 22.47	20.84 22.47	20.81 22.47	-----	-----	62.85 60.34	-----	-----	-----		
Wastewater Treatment Plant	-----	-----	-----	-----	-----	12.54 23.54	-----	-----	-----		
Natural Gas Combustion	0.17 0.18	0.66 0.74	0.05 0.74	0.05 0.06	8.73 9.71	0.48 0.53	7.33 8.16	0.16 0.18	0.16 0.17		
Total PTE of Entire Source Excluding Fugitives	20.97 22.65	21.47 23.21	21.47 23.21	0.05 0.06	8.73 9.71	78.85 90.01	7.33 8.16	7.12 16.52	2.76 6.47		
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10		
Paved Roads	0.18	0.04	0.01	-----	-----	-----	-----	-----	-----		
Total PTE of Entire Source Including Fugitives	21.15 22.83	21.50 23.24	21.48 23.22	0.05 0.06	8.73 9.71	78.85 90.01	7.33 8.16	7.12 16.52	2.76 6.47		
MSOP Threshold	25	25	25	25	25	25	-	-	-		
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .											

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single Tetrachloroethylene HAP
Eight (8) Washers (EU4, EU5, and EU-19-EU24)	-----	-----	-----	-----	-----	5.59	-----	16.34	6.47
Six (6) Dryers(EU14, EU15, and EU25-EU28)	22.47	22.47	22.47	-----	-----	60.34	-----		
Wastewater Treatment Plant	-----	-----	-----	-----	-----	23.54	-----		
Natural Gas Combustion	0.18	0.74	0.74	0.06	9.71	0.53	8.16	0.18	0.17
Total PTE of Entire Source Excluding Fugitives	22.65	23.21	23.21	0.06	9.71	90.01	8.16	16.52	6.47
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Paved Roads	0.18	0.04	0.01	-----	-----	-----	-----	-----	-----
Total PTE of Entire Source Including Fugitives	22.83	23.24	23.22	0.06	9.71	90.01	8.16	16.52	6.47
MSOP Threshold	25	25	25	25	25	25	-	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .									

MSOP Status

- (1) Criteria Pollutants
 This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (2) HAPs
 This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10)

tons per year and the PTE of a combination of HAPs will still be 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.

Permit Level Determination – PSD

- (a) PSD Minor Source – PM
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) PSD Minor Source – Other Regulated Pollutants
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above or Appendix A.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

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

See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

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

The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units 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.

See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), the source is located in Marion County and has the potential to emit greater than 10 tons per year or more. Therefore 326 IAC 6.5-1-2(b)(3) applies to the boilers, identified as EU1 and EU2 and 326 IAC 6.5-1-2(a) applies to the following:

- (1) dryers identified as EU14, EU15, and EU25 through EU28;
- (2) natural gas-fired steam tunnel, identified as EU16; and
- (3) HVAC heaters, various small units totaling 1.0 MMBtu/hr.

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

Pursuant to 326 IAC 6-2-1(e), since 326 IAC 6.5 particulate matter limitations apply to the boilers the limitations in 326 IAC 6.5 prevail. Therefore, 326 IAC 6-2-4 does not apply to the boilers, identified as EU1 and EU2.

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

Pursuant to 326 IAC 6-3-1(c)(3), since 326 IAC 6.5 particulate matter limitations apply to the dryers, 326 IAC 6-3 does not apply to dryers identified as EU14, EU15, and EU25 through EU28.

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

The washers EU19 through EU24 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.

The natural gas-fired dryers EU25 through EU28 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.

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
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The existing compliance determination and monitoring requirements will not be affected by the proposed changes.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) The revision includes the addition of six (6) new washers, four (4) new dryers, and an operational increase in the amount of wastewater processed by the wastewater treatment plant and the removal of three (3) washers, six (6) dryers, and a one (1) tunnel washer. The facility descriptions in Condition A.2 and Sections D.1 and D.2 have been revised to include the revision as follows:

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;~~
- (b) Eight (8) washers, using no controls, and exhausting inside the building, as follows:**
 - (e1) 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;~~
 - (e2) 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;~~
 - (3) One (1) washer, identified as EU19, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (4) One (1) washer, identified as EU20, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (5) One (1) washer, identified as EU21, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (6) One (1) washer, identified as EU22, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (7) One (1) washer, identified as EU23, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
 - (8) One (1) washer, identified as EU24, approved in 2016 for construction, with a maximum capacity of 563 pounds of soiled laundry per load;**
- ~~(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;~~
- (c) Six (6) natural gas-fired dryers, using no controls, and exhausting through a dryer stack, as follows:**
 - ~~(e1) 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;~~
 - ~~(e2) 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;~~
 - (3) One (1) natural gas-fired dryer, identified as EU25, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;**
 - (4) One (1) natural gas-fired dryer, identified as EU26, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;**
 - (5) One (1) natural gas-fired dryer, identified as EU27, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load; and**
 - (6) One (1) natural gas-fired dryer, identified as EU28, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load.**
- ~~(sd) 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;~~
- ~~(pe) 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;~~
- ~~(qf) 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~~
- ~~(rg) Fugitive particulate emissions from paved roads and parking lots. [326 IAC 6-4]~~

...

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;~~

(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.**

(c) **Six (6) natural gas-fired dryers, using no controls, and exhausting through a dryer stack, as follows:**

(1) 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;

- (2) 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;~~
 - (3) One (1) natural gas-fired dryer, identified as EU25, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
 - (4) One (1) natural gas-fired dryer, identified as EU26, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load;
 - (5) One (1) natural gas-fired dryer, identified as EU27, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load; and
 - (6) One (1) natural gas-fired dryer, identified as EU28, approved in 2016 for construction, with a maximum heat input capacity of 2.8 MMBTU/hr, and a maximum capacity of 450 pounds of clean dry laundry per load.
- (d) 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) 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
- (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.~~

D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]

(a) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) emissions shall not exceed the limit as follows:

emission unit description	emission unit ID	limit (grains/dscf)
boiler	EU1	0.01
boiler	EU1	0.01

(b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from shall not exceed the limit as follows:

emission unit description	emission unit ID	limit (grains/dscf)
dryers	EU14	0.03
	EU15	0.03
	EU25	0.03
	EU26	0.03
	EU27	0.03
	EU28	0.03
natural gas-fired steam tunnel	EU16	0.03
each HVAC heater	NA	0.03

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

<p>Emissions Unit Description:</p> <p>(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.</p> <p>(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)</p>

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.

Additional Changes

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

Change 1: IDEM clarified the SIC code description and township of source location.

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 (Industrial Launderers)
County Location:	Marion Outside Center, Perry, and Wayne (Pike Township)

Change 2: IDEM revised Condition C.3 to reflect the 326 IAC 5-1-2(2) rule requirements. The changes are as follows:

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~~ **thirty** percent (~~40%~~) (**30%**) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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 April 18, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 097-37091-00719. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Monica Dick 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) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (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: 097-37091-00719
Reviewer: Monica Dick

Uncontrolled Potential to Emit (tons per year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions										
Washers	-----	-----	-----	-----	-----	5.59	-----	16.34	6.47	Tetrachloroethylene
Dryers	22.47	22.47	22.47	-----	-----	60.34	-----			
Wastewater Treatment Plant	-----	-----	-----	-----	-----	23.54	-----			
Natural Gas Combustion	0.18	0.74	0.74	0.06	9.71	0.53	8.16	0.18	0.17	Hexane
Total Non-Fugitive Emissions	22.65	23.21	23.21	0.06	9.71	90.01	8.16	16.52	6.47	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)	22.83	23.24	23.22	0.06	9.71	90.01	8.16	16.52	6.47	Tetrachloroethylene
Title V Permit Threshold	NA	100	100	100	100	100	100	25	10	

⁽¹⁾ Mitigated

Appendix A: Emissions Calculations

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

Uncontrolled Potential to Emit (tons per year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
New Washers (EU-19-EU24)	-----	-----	-----	-----	-----	4.36	-----	15.27	6.05	Tetrachloroethylene
New Dryers (EU25-EU28)	19.97	19.97	19.97	-----	-----	60.34	-----			
Operational Change - Wastewater Treatment Plant	-----	-----	-----	-----	-----	22.00	-----			
New Dryers - Combustion	0.09	0.37	0.37	0.03	4.81	0.26	4.04	0.09	0.09	Hexane
Total Emissions	20.06	20.34	20.34	0.03	4.81	86.96	4.04	15.36	6.05	Tetrachloroethylene

Appendix A: Emissions Calculations

VOC Emissions From New Washers and Dryers

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

After Revision							
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							4.356
EU19	563	1.5	5,840	0.53	0.87	NO	
EU20	563	1.5	5,840	0.53	0.87	NO	
EU21	563	1.5	5,840	0.53	0.87	NO	
EU22	563	1.5	5,840	0.53	0.87	NO	
EU23	563	1.5	5,840	0.53	0.87	NO	
EU24	563	NA	NA	NA	NA	NO	
Dryers Max. Dry Weight							60.34
EU25	450	0.75	11,680	5.74	15.08	NO	
EU26	450	0.75	11,680	5.74	15.08	NO	
EU27	450	0.75	11,680	5.74	15.08	NO	
EU28	450	0.75	11,680	5.74	15.08	NO	
Wastewater Treatment Plant							22.00
EU18	3378	NA	5,840	2.23	22.00	NO	
Total Uncontrolled VOC					86.69		

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%.

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)

Appendix A: Emissions Calculations

HAP Emissions From New Washers and Dryers

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

Before Revision				
		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	3.06E-05	19,727,520	0.30	15.27
Chloromethane	9.81E-07		0.01	
Methylene Chloride (Dichloromethane)	3.30E-05		0.33	
Chloroform	1.65E-05		0.16	
Trichloroethylene	3.43E-06		0.03	
Tetrachloroethylene	6.13E-04		6.05	
Benzene	5.13E-06		0.05	
Toluene	3.21E-04		3.16	
Ethyl Benzene	8.33E-05		0.82	
Styrene	2.96E-06		0.03	
Hexane	1.86E-05		0.18	
Xylene	4.19E-04		4.14	

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 - New Dryers

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

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

Dryer ID	Capacity Pounds of Dry Shop Towels (lb of Shop Towel/load)	Emission Factor (lb PM/lb of shop towel)	Control Efficiency %	Potential to Emit after Controls (tons/year)	Potential to Emit After Controls (lb/hr)	Uncontrolled Potential to Emit (tons/year)
EU25	450	0.0019	85%	0.75	0.17	4.99
EU26	450	0.0019	85%	0.75	0.17	4.99
EU27	450	0.0019	85%	0.75	0.17	4.99
EU28	450	0.0019	85%	0.75	0.17	4.99
Total (tons per year) =				3.00		19.97

Methodology

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

Emission Factor (lb PM/lb of shop towel) = The emission factor is before controls, resulting from permitting analysis, G & K Services Co. - Montgomery Plant, Montgomery Alabama,

Facility No. 209-0100.

Natural Gas Combustion - New Dryers

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

Emission Unit	EU-ID	Capacity - MMBTU/hr	Total Heat Input Capacity	HHV MMBtu	Potential Throughput MMCF/yr
Dryer	EU25	2.8	11.2	1020	96.2
Dryer	EU26	2.8			
Dryer	EU27	2.8			
Dryer	EU28	2.8			
Total		11.2			

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.09	0.37	0.37	0.03	**see below	0.26	4.04

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics	Total HAPs
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene		
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	0.09	0.09
Potential Emission in tons/yr	0.00	0.00	0.00	0.09	0.00		0.09

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	0.00
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00	

*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
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

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

Emission Unit	EU-ID	Capacity -
Boiler	EU1	4.185
Boiler	EU2	4.185
Steam Tunnel	EU16	1.5
Dryer	EU25	2.8
Dryer	EU26	2.8
Dryer	EU27	2.8
Dryer	EU28	2.8
Dryer	EU14	0.37
Dryer	EU15	0.18
HVAC Units	various	1.0
Total	22.62	

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

Total Heat Input Capacity	HHV MMBtu	Potential Throughput
MMBtu/hr	MMscf	MMCF/yr
22.6	1020	194.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons	0.18	0.74	0.74	0.06		0.53	8.16

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 M

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics	Total HAPs
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene		
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.828E-01	0.18
							Worst HAP
Potential Emission in tons	2.040E-04	1.166E-04	7.285E-03	1.748E-01	3.303E-04		Hexane
							0.17

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	5.323E-04
Potential Emission in tons	4.857E-05	1.068E-04	1.360E-04	3.691E-05	2.040E-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.

Appendix A: Emissions Calculations

VOC Emissions From Washers, Dryers and Wastewater Treatment Plant

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

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							5.59
EU4	156	1.5	5,840	0.53	0.24	NO	
EU5	81	1.5	5,840	0.53	0.13	NO	
EU19	563	1.5	5,840	0.53	0.87	NO	
EU20	563	1.5	5,840	0.53	0.87	NO	
EU21	563	1.5	5,840	0.53	0.87	NO	
EU22	563	1.5	5,840	0.53	0.87	NO	
EU23	563	1.5	5,840	0.53	0.87	NO	
EU24	563	1.5	5,840	0.53	0.87	NO	
Dryers Max. Dry Weight							60.34
EU14	150	0.75	11,680	5.74	5.03	NO	
EU15	75	0.75	11,680	5.74	2.51	NO	
EU16 ³	NA	NA	NA	NA	NA	NO	
EU25	450	0.75	11,680	5.74	15.08	NO	
EU26	450	0.75	11,680	5.74	15.08	NO	
EU27	450	0.75	11,680	5.74	15.08	NO	
EU28	450	0.75	11,680	5.74	15.08	NO	
Wastewater Treatment Plant							23.54
EU18	3615	NA	5,840	2.23	23.54	NO	
Total Uncontrolled VOC					97.02		

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%.

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)

Appendix A: Emissions Calculations

HAP Emissions From Washers, Dryers and Wastewater Treatment Plant

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

Before Revision				
		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	3.06E-05	21,111,600	0.32	16.34
Chloromethane	9.81E-07		0.01	
Methylene Chloride (Dichloromethane)	3.30E-05		0.35	
Chloroform	1.65E-05		0.17	
Trichloroethylene	3.43E-06		0.04	
Tetrachloroethylene	6.13E-04		6.47	
Benzene	5.13E-06		0.05	
Toluene	3.21E-04		3.38	
Ethyl Benzene	8.33E-05		0.88	
Styrene	2.96E-06		0.03	
Hexane	1.86E-05		0.20	
Xylene	4.19E-04		4.43	

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: 097-37091-00719
Reviewer: Monica Dick

Dryer Duration (hr) =	0.75
Maximum No. of Loads (annual) =	11,680

Dryer ID	Maximum Capacity Pounds of Dry Shop Towels (lb of Shop Towel/load)	Emission Factor (lb PM/lb of shop towel)	Control Efficiency %	Potential to Emit after Controls (tons/year)	Potential to Emit After Controls (lb/hr)	Uncontrolled Potential to Emit (tons/year)
EU14	150	0.0019	85%	0.25	0.06	1.66
EU15	75	0.0019	85%	0.12	0.03	0.83
EU25	450	0.0019	85%	0.75	0.17	4.99
EU26	450	0.0019	85%	0.75	0.17	4.99
EU27	450	0.0019	85%	0.75	0.17	4.99
EU28	450	0.0019	85%	0.75	0.17	4.99
Total (tons per year) =				3.37		22.47

Methodology

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

Emission Factor (lb PM/lb of shop towel) = The emission factor is before controls, resulting from permitting analysis, G & K Services Co. - Montgomery Plant, Montgomery Alabama, Facility No. 209-0100.

Appendix A: Emissions Calculations

Fugitive PM Emissions - Roads

Company Name: Cintas Corporation
Address City IN Zip: 7258 Georgetown Road, Indianapolis, IN 46268
Permit Number: 097-37091-00719
Reviewer: Monica Dick

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 day (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 day (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

June 10, 2016

Steve Schoenlein
Cintas
27 Whitney Dr
Milford, OH 45150-9784

Re: Public Notice
Cintas
Permit Level: MSOP - Significant Permit Revision
Permit Number: 097 - 37091 - 00719

Dear Steve Schoenlein:

Enclosed is a copy of your draft MSOP - Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than June 14, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Pike Branch Library, 6525 Zionsville Road in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Monica Dick, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-1243 or dial (317) 234-1243.

Sincerely,

Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

June 9, 2016

Indianapolis Star
Attn: Classifieds
130 S. Meridian St.
Indianapolis, Indiana 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Cintas, Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than June 14, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: MSOP - Significant Permit Revision
Permit Number: 097 - 37091 - 00719

Enclosure
PN Newspaper.dot 6/13/2013



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

June 10, 2016

To: Pike Branch Library 6525 Zionsville Road Indianapolis IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Cintas
Permit Number: 097 - 37091 - 00719

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



Indiana Department of Environmental Management

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

June 10, 2016
Cintas
097 - 37091 - 00719

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	LPOGOST 6/10/2016 Cintas 097 - 37091 - 00719 draft		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Steve Schoenlein Cintas 27 Whitney Dr Milford OH 45150-9784 (Source CAATS)										
2		Glenn Larsen VP - Quality and Engineering Cintas 27 Whitney Dr Milford OH 45150-9784 (RO CAATS)										
3		Wilber Partnership 7240 Georgetown Rd Indianapolis IN 46268 (Affected Party)										
4		Powers, Challen & Steven 7260 Georgetown Rd Indianapolis in 46268 (Affected Party)										
5		Whitman Properties LLC 7264 Georgetown Rd Indianapolis in 46268 (Affected Party)										
6		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
7		Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
8		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
9		Pike Branch Library 6525 Zionsville Road Indianapolis IN 46268 (Library)										
10		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)										
11		ZDAG LLC 7270 Georgetown Rd Indianapolis in 46268 (Affected Party)										
12		Cash-Is-King LLC 7225 Georgetown Rd Indianapolis in 46268 (Affected Party)										
13		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)										
14		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)										
15		Ms. Tina Berceli-Boyle Haley & Aldrich, Inc.. 3 Bedford Farms Drive Bedford NH 03110 (Consultant)										

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