



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Federally Enforceable State Operating Permit (FESOP)

for ARAMARK Uniform & Career Apparel, LLC in Marion County

FESOP No.: F 097-37472-00721

The Indiana Department of Environmental Management (IDEM) has received an application from ARAMARK Uniform & Career Apparel, LLC, located at 2050 West Oliver Avenue, Indianapolis, Indiana 46221, for a Minor Source Operating Permit transitioning to a FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow ARAMARK Uniform & Career Apparel, LLC to continue to operate its existing source.

This draft FESOP does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Indianapolis Central Public Library  
40 East St. Clair Street  
Indianapolis, IN 46204

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 30<sup>th</sup> 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 F 097-37472-00721 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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



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



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Commissioner

DRAFT

## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**ARAMARK Uniform & Career Apparel, LLC**  
**2050 West Oliver Avenue**  
**Indianapolis, Indiana 46221**

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

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

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

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

Operation Permit No.: F097-37472-00721	
Issued by:	Issuance Date:
Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Expiration Date:

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>6</b>
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6][IC 13-17-12]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Source Modification Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>15</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>	<b>15</b>
C.1	Overall Source Limit [326 IAC 2-8]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.4	Incineration [326 IAC 4-2][326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-8-4(3)].....</b>	<b>17</b>
C.7	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>17</b>
C.8	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] .....</b>	<b>18</b>
C.9	Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	
C.10	Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	

<b>Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]</b>	<b>18</b>
C.11 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]	
C.12 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>	<b>20</b>
C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]	
C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]	
<b>Stratospheric Ozone Protection</b>	<b>21</b>
C.16 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b>	<b>22</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>22</b>
D.1.1 Volatile Organic Compounds (VOC) FESOP Limits [326 IAC 2-8]	
D.1.2 Volatile Organic Compounds Minor Limit [326 IAC 8-1-6]	
D.1.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]	
D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
<b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b>	<b>24</b>
D.1.5 Particulate Control	
<b>Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]</b>	<b>24</b>
D.1.6 Filter Inspections	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>	<b>24</b>
D.1.7 Record Keeping Requirement	
D.1.8 Reporting Requirements	
<b>SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS</b>	<b>26</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>26</b>
D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]	
<b>CERTIFICATION</b>	<b>27</b>
<b>EMERGENCY OCCURRENCE REPORT</b>	<b>28</b>
<b>FESOP Quarterly Report</b>	<b>30</b>
<b>FESOP Quarterly Report</b>	<b>31</b>
<b>FESOP Quarterly Report</b>	<b>32</b>
<b>FESOP Quarterly Report</b>	<b>33</b>
<b>QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT</b>	<b>34</b>

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary industrial laundry facility.

Source Address:	2050 West Oliver Avenue, Indianapolis, Indiana 46221
General Source Phone Number:	317-634-1232
SIC Code:	7218 (Industrial Launderers)
County Location:	Marion (Center Township)
Source Location Status:	Nonattainment for SO <sub>2</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

- (a) Seven (7) washers, with no controls and exhausting inside the building, as follows:
  - (1) Three (3) Ellis washers, identified as W1, W3, and W4, installed in 1997, with a maximum throughput capacity of 900 pounds of clean dry weight laundry per load.
  - (2) Two (2) Ellis Washers, identified as W2 and W6, both installed in 1999, each with a maximum throughput capacity of 675 pounds of clean dry weight laundry per load.
  - (3) One (1) Ellis Washer, identified as W7, installed in 1999, with a maximum throughput capacity of 90 pounds of clean dry weight laundry per load.
- (b) Four (4) dryers using natural gas, as follows:
  - (1) One (1) natural gas-fired industrial dryer, identified as D1, installed in 2001, with a nominal capacity of 600 pounds of dry textiles per load, and a maximum heat input capacity of 2.90 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through dryer stack S1.
  - (2) Two (2) natural gas-fired industrial dryers, identified as D2 and D3, installed in 1998, with a nominal capacity of 400 pounds of dry textiles per load, and a maximum heat input capacity of 2.75 million British thermal units per hour (MMBtu/hr) each, utilizing dryer lint filters for particulate control and exhausting through dryer stacks S2 and S3.
  - (3) One (1) natural gas-fired industrial dryer, identified as D4, installed in 2006, with a nominal capacity of 100 pounds of dry textiles per load, and a maximum heat

input capacity of 0.25 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through dryer stack S4.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) natural gas-fired Steam Tunnel, identified as T1, installed in 1998, with a maximum heat input capacity of 0.4 MMBtu/hr, with no controls and exhausting through a stack S5.
- (b) One (1) natural gas-fired Cleaver Brooks boiler, identified as Boiler 1, installed in 1966, with a maximum heat input capacity of 10.0 MMBtu/hr, with no controls and exhausting through stack S6.
- (c) Miscellaneous liquid storage tanks.
- (d) Twelve (12) natural gas-fired Building Heaters (HVAC), identified as HVAC 1 through HVAC 12, with a total maximum heat input rate of 3.1 MMBtu/hr.

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

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

## SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

- (a) This permit, F097-37472-00721, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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



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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission

limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F097-37472-00721 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

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



**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Overall Source Limit [326 IAC 2-8]**

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

**C.2 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.3 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.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

C.5 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.6 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. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

**C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

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

**C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

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

**C.11 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

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

**C.12 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

### C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.16 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Seven (7) washers, with no controls and exhausting inside the building, as follows:
  - (1) Three (3) Ellis washers, identified as W1, W3, and W4, installed in 1997, with a maximum throughput capacity of 900 pounds of clean dry weight laundry per load.
  - (2) Two (2) Ellis Washers, identified as W2 and W6, both installed in 1999, each with a maximum throughput capacity of 675 pounds of clean dry weight laundry per load.
  - (3) One (1) Ellis Washer, identified as W7, installed in 1999, with a maximum throughput capacity of 90 pounds of clean dry weight laundry per load.
- (b) Four (4) dryers using natural gas, as follows:
  - (1) One (1) natural gas-fired industrial dryer, identified as D1, installed in 2001, with a nominal capacity of 600 pounds of dry textiles per load, and a maximum heat input capacity of 2.90 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through dryer stack S1.
  - (2) Two (2) natural gas-fired industrial dryers, identified as D2 and D3, installed in 1998, with a nominal capacity of 400 pounds of dry textiles per load, and a maximum heat input capacity of 2.75 million British thermal units per hour (MMBtu/hr) each, utilizing dryer lint filters for particulate control and exhausting through dryer stacks S2 and S3.
  - (3) One (1) natural gas-fired industrial dryer, identified as D4, installed in 2006, with a nominal capacity of 100 pounds of dry textiles per load, and a maximum heat input capacity of 0.25 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through dryer stack S4.

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

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

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

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70) not applicable, the Permittee shall comply with the following:

- (a) The maximum combined throughput weight of washed soiled shop towels (SST) to the washers shall not exceed 16 million lbs of SST per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission from the washers when processing soiled shop towels shall not exceed 0.96 lbs VOC per 1000 lbs of SST.
- (c) The VOC emission from the dryers when processing soiled shop towels shall not exceed 8.66 lbs VOC per 1000 lbs of SST.
- (d) The Permittee shall implement the following good work practices:
  - (1) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a cover



area or in sealed containers prior to being shipped off-site for laundering.

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

Compliance with these limits, combined with the potential to emit VOC from the washers and dryers when processing soiled other material and all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per year, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable to this source.

#### D.1.2 Volatile Organic Compounds Minor Limit [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and in order to render the requirements of 326 IAC 8-1-6 not applicable, each dryer, identified as D1, D2, and D3 shall be limited as follows:

- (a) The amount of dried soiled shop towels (SST) processed from dryer D1 shall not exceed 5,751,742 lbs of SST per twelve (12) consecutive month period with compliance determined at the end of each month
- (b) The amount of dried soiled shop towels (SST) processed from dryer D2 shall not exceed 5,751,742 lbs of SST per twelve (12) consecutive month period with compliance determined at the end of each month
- (c) The amount of dried soiled shop towels (SST) processed from dryer D3 shall not exceed 5,751,742 lbs of SST per twelve (12) consecutive month period with compliance determined at the end of each month
- (d) VOC emission from each dryer, identified as D1, D2, and D3 when processing soiled shop towels shall not exceed 8.66 lbs VOC per 1000 lbs of SST.
- (e) The Permittee shall implement the following good work practices:
  - (1) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a covered area or in sealed containers prior to being shipped off-site for laundering.
  - (2) Shop towels containing or saturated with free liquid shall not be processed at this facility.
  - (3) Soiled shop towels shall be processed separately from other textile goods.

Compliance with these limits shall limit the potential to emit VOC from each dryer, identified as D1, D2, and D3 to less than twenty-five (25) tons per year and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

**D.1.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]**

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

emission unit description	emission unit ID	limit (grains/dscf)
dryers	D1	0.03
	D2	0.03
	D3	0.03
	D4	0.03

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan is required for dryers identified as, D1, D2, and D3 and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.5 Particulate Control**

In order to comply with condition D.1.3, the filters for particulate control shall be in operation and control emissions from the dryers identified as, D1, D2, D3, and D4 at all times that the dryers identified as, D1, D2, D3, and D4 are in operation.

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

**D.1.6 Filter Inspections**

The Permittee shall perform semi-annual inspections of the filters controlling particulate from dryers identified as, D1, D2, D3, and D4 to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

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

**D.1.7 Record Keeping Requirement**

- (a) To document the compliance status with VOC limit in Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (3) below. Records maintained for (1) and (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits required in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The total weight of soiled shop towels (SST) processed at all washers on monthly basis.
  - (2) The corresponding total VOC emissions for each month, using an emission factor of 0.96 pounds of VOC per 1000 pounds of SST.
  - (3) The corresponding total VOC emissions for each month, using an emission factor of 8.66 pounds of VOC per 1000 pounds of SST.
- (b) To document the compliance status with Condition D.1.2 the Permittee shall maintain records of the total pounds of SST processed per month in each dryer identified as, D1, D2, and D3.

- (c) To document the compliance status with Condition D.1.6 – Filter Inspection, the Permittee shall maintain records of filter inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) natural gas-fired Steam Tunnel, identified as T1, installed in 1998, with a maximum heat input capacity of 0.4 MMBtu/hr, with no controls and exhausting through a stack S5.
- (b) One (1) natural gas-fired Cleaver Brooks boiler, identified as Boiler 1, installed in 1966, with a maximum heat input capacity of 10.0 MMBtu/hr, with no controls and exhausting through stack S6.
- (d) Twelve (12) natural gas-fired Building Heaters (HVAC), identified as HVAC 1 through HVAC 12, with a total maximum heat input rate of 3.1 MMBtu/hr.

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

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

#### D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]

- (a) 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)
natural gas-fired steam tunnel	T1	0.03
each HVAC heater	NA	0.03

- (b) 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	Boiler 1	0.01

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12</li></ul> |
|--|

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

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

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

Page 2 of 2

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

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721  
Facility: Washers when processing soiled shop towels  
Parameter: pounds of soiled shop towels processed  
Limit: 16 million lbs of SST processed from washers per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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



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

**FESOP Quarterly Report**

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721  
Facility: Dryer D1  
Parameter: pounds of soiled shop towels  
Limit: 5,751,742 lbs of SST processed from dryer D1 per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

**FESOP Quarterly Report**

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721  
Facility: Dryer D2  
Parameter: pounds of soiled shop towels  
Limit: 5,751,742 lbs of SST processed from dryer D2 per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

**FESOP Quarterly Report**

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721  
Facility: Dryer D3  
Parameter: pounds of soiled shop towels  
Limit: 5,751,742 lbs of SST processed from dryer D3 per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

Source Name: ARAMARK Uniform & Career Apparel, LLC  
Source Address: 2050 West Oliver Avenue, Indianapolis, Indiana 46221  
FESOP Permit No.: F097-37472-00721

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

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

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

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

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

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

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a MSOP Transitioning to a Federally Enforceable State Operating Permit FESOP

### Source Description and Location

Source Name:	ARAMARK Uniform & Career Apparel, LLC
Source Location:	2050 West Oliver Avenue, Indianapolis, Indiana 46221
County:	Marion (Center Township)
SIC Code:	7218 (Industrial Launderers)
Operation Permit No.:	F 097-37472-00721
Permit Reviewer:	Monica Dick

On August 4, 2016, the Office of Air Quality (OAQ) received an application from ARAMARK Uniform & Career Apparel, LLC related to the transition of a Minor Source Operating Permit to a FESOP.

### Background Information

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

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

(a) The affected industry is categorized as follows:

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

(b) Aramark Uniform & Career Apparel, LLC (Aramark Uniform) laundry process description:

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

The soiled laundry is delivered to the facility via delivery trucks and is unloaded at the unloading bay, sorted into slings, weighed and staged for laundering. The staged laundry is transported to the wash alley via overhead conveyor lines or large bins. The soiled laundry is loaded into a washing machine and washed with detergent and hot water. Washing times vary depending on the type of product being washed based on established formulations. The formulation for shop towels takes approximately 65 minutes of wash time. Washing machines vent inside the building.

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

- (c) The MSOP 097-33734-00721, issued May 19, 2015 required that VOC emissions from soiled shop towels be tested during washing and drying at the ARAMARK Uniform & Career Apparel, LLC, in Indianapolis or at another representative ARAMARK facility. A stack test was conducted on July 15, 2015 at the Terre Haute facility as a representative ARAMARK facility. The resulting VOC emission factors established during the test provided that as a worst case, if ARAMARK Uniform & Career Apparel, LLC, in Indianapolis washed and dried only soiled shop towels at the facilities maximum capacity, the facility would be a Major Part 70 source. As a result of the emission factor established during the stack test, ARAMARK Uniform & Career Apparel, LLC is requesting a transition from a Minor Source Operating Permit (MSOP) to Federally Enforceable Operating Permit (FESOP).

<b>Existing Approvals</b>
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Due to this application, the source is transitioning from a MSOP097-33734-00721, issued May 19, 2015 to a FESOP.

### County Attainment Status

The source is located in Marion County (Center Township):

Pollutant	Designation
SO <sub>2</sub>	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 <sup>th</sup> 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 <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Attainment effective July 11, 2013, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Attainment 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<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Marion County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO<sub>2</sub>**  
 U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County Center Township as nonattainment for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (d) **Other Criteria Pollutants**  
 Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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



### **Background and Description of Permitted Emission Units**

The Office of Air Quality (OAQ) has reviewed an application, submitted by ARAMARK Uniform & Career Apparel, LLC on August 4, 2016, relating to an industrial laundry operation.

The source consists of the following permitted emission units:

- (a) Seven (7) washers, with no controls and exhausting inside the building, as follows:
  - (1) Three (3) Ellis washers, identified as W1, W3, and W4, installed in 1997, with a maximum throughput capacity of 900 pounds of clean dry weight laundry per load.
  - (2) Two (2) Ellis Washers, identified as W2 and W6, both installed in 1999, each with a maximum throughput capacity of 675 pounds of clean dry weight laundry per load.
  - (3) One (1) Ellis Washer, identified as W7, installed in 1999, with a maximum throughput capacity of 90 pounds of clean dry weight laundry per load.
- (b) Four (4) dryers using natural gas, as follows:
  - (1) One (1) natural gas-fired industrial dryer, identified as D1, installed in 2001, with a nominal capacity of 600 pounds of dry textiles per load, and a maximum heat input capacity of 2.90 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through dryer stack S1.
  - (2) Two (2) natural gas-fired industrial dryers, identified as D2 and D3, installed in 1998, with a nominal capacity of 400 pounds of dry textiles per load, and a maximum heat input capacity of 2.75 million British thermal units per hour (MMBtu/hr) each, utilizing dryer lint filters for particulate control and exhausting through dryer stacks S2 and S3.
  - (3) One (1) natural gas-fired industrial dryer, identified as D4, installed in 2006, with a nominal capacity of 100 pounds of dry textiles per load, and a maximum heat input capacity of 0.25 million British thermal units per hour (MMBtu/hr), utilizing dryer lint filters for particulate control and exhausting through dryer stack S4.

### **Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) One (1) natural gas-fired Steam Tunnel, identified as T1, installed in 1998, with a maximum heat input capacity of 0.4 MMBtu/hr, with no controls and exhausting through a stack S5.
- (b) One (1) natural gas-fired Cleaver Brooks boiler, identified as Boiler 1, installed in 1966, with a maximum heat input capacity of 10.0 MMBtu/hr, with no controls and exhausting through stack S6.
- (c) Miscellaneous liquid storage tanks.
- (d) Twelve (12) natural gas-fired Building Heaters (HVAC), identified as HVAC 1 through HVAC 12, with a total maximum heat input rate of 3.1 MMBtu/hr.

### Enforcement Issues

There are no pending enforcement actions related to this source.

### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Permit Level Determination - FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	59.85
PM10 <sup>(1)</sup>	3.02
PM2.5 <sup>(1)</sup>	3.02
SO <sub>2</sub>	0.06
NO <sub>x</sub>	9.51
VOC	147.07
CO	7.99

- (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 (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Worst Case Single*	6.45
TOTAL HAPs	14.80

\* Tetrachloroethylene

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of VOCs are greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit

(FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

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

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM*	PM10	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Washers	0.00	0.00	0.00	0.00	0.00	7.65	0.00	-	-
Dryers	59.67	2.30	2.30	0.00	0.00	69.27	0.00	-	-
All other Processes Associated with Washer /Dryer Operation	0.00	0.00	0.00	0.00	0.00	12.31	0.00	-	-
VOCs from Detergent Usage Mass Balance	0.00	0.00	0.00	0.00	0.00	8.09	0.00	-	-
Natural Gas Combustion	0.18	0.72	0.72	0.06	9.51	0.52	7.99	negl	0.18
<b>Total PTE of Entire Source</b>	<b>59.85</b>	<b>3.02</b>	<b>3.02</b>	<b>0.06</b>	<b>9.51</b>	<b>97.83</b>	<b>7.99</b>	<b>6.45</b>	<b>14.80</b>
Title V Major Source Thresholds**	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
Emission Offset Major Thresholds	--	--	--	100	--	--	--	-	-
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 <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

**FESOP Status**

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

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

- (a) The maximum combined throughput weight of washed soiled shop towels (SST) to the washers shall not exceed 16 million lbs of SST per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission from the washers when processing soiled shop towels shall not exceed 0.96 lbs VOC per 1000 lbs of SST.
- (c) The VOC emission from the dryers when processing soiled shop towels shall not exceed 8.66 lbs VOC per 1000 lbs of SST.
- (d) The Permittee shall implement the following good work practices:
  - (1) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a cover area or in sealed containers prior to being shipped off-site for laundering.
  - (2) Shop towels containing or saturated with free liquid shall not be processed at this facility.
  - (3) Soiled shop towels shall be processed separately from other textile goods.

Compliance with these limits, combined with the potential to emit VOC from the washers and dryers when processing soiled other material and all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per year, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable to this source.

#### PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
- (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

#### Emission Offset Minor Source

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit SO<sub>2</sub> is less than 100 tons per year and the potential to emit all nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

<b>Federal Rule Applicability Determination</b>
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#### New Source Performance Standards (NSPS)

- (a) The requirements of New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart Dc Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units that were constructed after June 9, 1989, were not included in this permit for the one (1) 10 MMBtu/hr natural gas-fired boiler identified as, Boiler 1 because the boiler was constructed in 1966.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR Part 63, Subpart JJJJJ (6J), which is incorporated by reference in 326 IAC 20-95, were not included in this permit for the one (1) 10

MMBtu/hr natural gas-fired boiler identified as, Boiler 1 because natural gas-fired boilers are exempt under 40 CFR 63.11195.

- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is not subject to 326 IAC 1-5-2.

326 IAC 2-8-4 (FESOP)

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

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

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

326 IAC 2-3 (Emission Offset)

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

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

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

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source is subject to 326 IAC 6.5 because its PM actual emissions are not restricted to less than 10 tons/year and the source is located in Marion County.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

The source is not subject to the requirements of 326 IAC 6-5, because potential fugitive particulate emissions are less than 25 tons per year.

<b>State Rule Applicability - Individual Units</b>
--

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

(a) 326 IAC 6.5-1-2(a), which limits emissions so that Particulate matter does not exceed 0.03 grain per dscf and applies to the following:

- (1) Four (4) dryers identified as D1, D2, D3, and D4;
- (2) Natural gas-fired steam tunnel, identified as T1; and
- (3) HVAC heaters, various small units totaling 3.1 MMBtu/hr.

(b) 326 IAC 6.5-1-2(b)(3), applies to the one (1) natural gas-fired boiler, Boiler 1, which limits particulate matter content of not greater than one-hundredth (0.01) foot (dscf).

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 boiler the limitations in 326 IAC 6.5 prevails. Therefore, 326 IAC 6-2-4 does not apply to the boiler, identified as Boiler 1.

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

The unlimited VOC potential emissions from each dryer, identified as D1, D2, and D3 is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from each unit to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, each dryer, identified as D1, D2, and D3 shall be limited as follows:

- (1) The amount of dried soiled shop towels (SST) processed from dryer D1 shall not exceed 5,751,742 lbs of SST per twelve (12) consecutive month period with compliance determined at the end of each month
- (2) The amount of dried soiled shop towels (SST) processed from dryer D2 shall not exceed 5,751,742 lbs of SST per twelve (12) consecutive month period with compliance determined at the end of each month
- (3) The amount of dried soiled shop towels (SST) processed from dryer D3 shall not exceed 5,751,742 lbs of SST per twelve (12) consecutive month period with compliance determined at the end of each month
- (4) VOC emission from each dryer, identified as D1, D2, and D3 when processing soiled shop towels shall not exceed 8.66 lbs VOC per 1000 lbs of SST.
- (5) The Permittee shall implement the following good work practices:
  - (i) Print towels or furniture towels shall not be processed at this facility. Print towels or furniture towels that are sent to the facility will be bagged and stored in a covered area or in sealed containers prior to being shipped off-site for laundering.
  - (ii) Shop towels containing or saturated with free liquid shall not be processed at this facility.

- (iii) Soiled shop towels shall be processed separately from other textile goods.

Compliance with these limits shall limit the potential to emit VOC from each dryer, identified as D1, D2, and D3 to less than twenty-five (25) tons per year and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) The monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
filters	inspections	semi-annual

Inspections of the filters for dryers identified as, D1, D2, D3, and D4 are required to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

- (b) The testing requirements are not applicable to the source.
- (1) The facility has a throughput limit for soiled shop towels with calculated VOC emissions, based on an emission factor established during a stack test at a similar ARAMARK facility in Terre Haute. The representative stack test and emission factor has been verified by IDEM, Compliance and Enforcement Data Section and it has been determined that an additional test at this facility is not required. Records of compliance with the throughput limit will ensure compliance.
- (2) The filters that control particulate from the dryers identified as, D1, D2, D3, and D4 comply with the particulate matter limit by ensuring filter specifications.

<b>Conclusion and Recommendation</b>
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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 August 4, 2016.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. F097-37472-00721. The staff recommends to the Commissioner that this FESOP be approved.

<b>IDEM Contact</b>
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- (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**  
**Potential to Emit Summary**

**Company Name:** Aramark Uniform & Career Apparel, LLC  
**Source Address:** 2050 West Oliver Ave, Indianapolis, IN 46221  
**Permit Number:** 097-37472-00721  
**Reviewer:** Monica Dick

Emission Unit	Potential to Emit (tons per year) uncontrolled								Total HAP
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Single HAP Tetrachloroethylene	
Washers	0.00	0.00	0.00	0.00	0.00	126.33	0.00	6.45	14.62
Dryers	59.67	2.30	2.30	0.00	0.00		0.00		
All other Processes Associated with Washer/Dryer Operation	0.00	0.00	0.00	0.00	0.00	20.21	0.00		
Natural Gas Combustion	0.18	0.72	0.72	0.06	9.51	0.52	7.99	-	0.18
<b>Source wide PTE (tons per year)</b>	<b>59.85</b>	<b>3.02</b>	<b>3.02</b>	<b>0.06</b>	<b>9.51</b>	<b>147.07</b>	<b>7.99</b>	<b>6.45</b>	<b>14.80</b>

Emission Unit	Potential to Emit After Issuance (tons per year)								Total HAP
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Single HAP	
Washers	0.00	0.00	0.00	0.00	0.00	85.00	0.00	6.45	14.62
Dryers	59.67	2.30	2.30	0.00	0.00		0.00		
All other Processes Associated with Washer/Dryer Operation	0.00	0.00	0.00	0.00	0.00	12.31	0.00		
Natural Gas Combustion	0.18	0.72	0.72	0.06	9.51	0.52	7.99	-	0.18
<b>Source wide PTE (tons per year)</b>	<b>59.85</b>	<b>3.02</b>	<b>3.02</b>	<b>0.06</b>	<b>9.51</b>	<b>97.83</b>	<b>7.99</b>	<b>6.45</b>	<b>14.80</b>



**Appendix A: Emissions Calculations**  
**VOC Emissions From Washers and Dryers**

**Company Name:** Aramark Uniform & Career Apparel, LLC  
**Source Address:** 2050 West Oliver Ave, Indianapolis, IN 46221  
**Permit Number:** 097-37472-00721  
**Reviewer:** Monica Dick

TABLE 1

Emission Unit	Emission Factor (lb VOC/1000 lb of SST) <sup>1</sup>	Total Maximum Capacity Pounds of Soiled Shop Towels/load (lb of SST/yr) <sup>2</sup>	Unrestricted VOC PTE (tons/yr)	Limited Capacity (lb SST/yr) <sup>5</sup>	Limited VOC Tons per year
Washers	0.96	26,280,000	12.6	16,000,000	7.65
Dryers	8.65824706		113.8		69.27
All other Processes Associated with Washer/Dryer Operation (when processing SST) <sup>4</sup>			20.2		12.31
		Total:	146.55		

Emission Unit (Balance of capacity under Limited PTE)	Detergent Usage Emission Factor (lb VOC/ 1,000 lb of Soiled Other Materials) <sup>3</sup>	Balance Capacity (lb SOM/yr) <sup>6</sup>	SOM PTE Tons VOC per year
Washers and Dryers	0.46	35,282,650	8.09
		Total:	97.31

Shop Towel Bottleneck : Dryer capacity is less than washer capacity.	
washer capacity	47,012,000
dryer capacity	26,280,000

**Shop Towel Bottleneck :** Dryer capacity is less than washer capacity.

washer capacity	47,012,000
dryer capacity	26,280,000

Note: Only soiled shop towels are regulated under the Industrial Launderers Initiative. However, to account for the entire source emission being limited under the FESOP the emissions from the remaining or balance capacity, i.e., washing "other types of material" were also calculated. Emission factor used for the balance or remaining emissions was based on the sum of VOC contents of the worst case combination of booster and detergents used in laundering the worst "other types of material."

TABLE 2

Emission Unit	Capacity (lbs Clean Dry Weight)	Maximum Capacity Pounds of Soiled Shop Towels/load (lb of SST/load)	Wash/Dry Cycle Duration (hr)	Maximum Loads per year	Emission Factor (lb VOC/1000 lb SST)	Unrestricted VOC PTE (tons/yr)	326 IAC 8-1-6 Applicability Is this facility PTE => 25 tpy (yes/no)
<b>Washers</b>							
W1	900	1260	1.08	8,111	0.956078518	4.9	NO
W2	675	945	1.08	8,111	0.956078518	3.7	NO
W3	900	1260	1.08	8,111	0.956078518	4.9	NO
W4	900	1260	1.08	8,111	0.956078518	4.9	NO
W6	675	945	1.08	8,111	0.956078518	3.7	NO
W7	90	126	1.08	8,111	0.956078518	0.5	NO
<b>TOTAL Capacity</b>	<b>4,140</b>	<b>5,796</b>	<b>1.08</b>	<b>8,111</b>	<b>0.956078518</b>	<b>22.5</b>	<b>--</b>

Dryers	Rated Capacity (lbs/hour)	Maximum Capacity Pounds of Soiled Shop Towels/load (lb of SST/load)	Wash/Dry Cycle Duration (hr)	Maximum Loads per year	Emission Factor (lb VOC/1000 lb SST)	Unrestricted VOC PTE (tons/yr)	326 IAC 8-1-6 Applicability Is this facility PTE => 25 tpy (yes/no)	Emission Unit	Maximum Capacity Pounds of Soiled Shop Towels (lb of SST/year) <sup>7</sup>	Emission Factor (lb VOC/1000 lb SST)	Limited VOC PTE (tons/yr)	Is this facility PTE => 25 tpy (yes/no)
Dryer 1	600	900	0.75	11,680	8.66	45.5	Yes	Dryer 1	5,751,742	8.66	24.9	NO
Dryer 2	400	600	0.75	11,680	8.66	30.3	Yes	Dryer 2	5,751,742	8.66	24.9	NO
Dryer 3	400	600	0.75	11,680	8.66	30.3	Yes	Dryer 3	5,751,742	8.66	24.9	NO
Dryer 4	100	150	0.75	11,680	8.66	7.6	NO					
<b>Total Capacity</b>	<b>1,500</b>	<b>2,250</b>	<b>0.75</b>	<b>11,680</b>	<b>8.66</b>	<b>113.8</b>	<b>--</b>					

Soil Factor 1.4  
 Dryer ST load factor 1.5

TABLE 3

Emission Unit	Detergent Usage Emission Factor (lb VOC/ 1,000 lb of Soiled Other Materials) <sup>3</sup>	Maximum Capacity Pounds of Soiled Other Materials/year (lb of SOM/yr)	Unrestricted VOC PTE (tons/yr)	326 IAC 8-1-6 Applicability Is this facility PTE => 25 tpy (yes/no)
Detergent Usage Mass Balance	0.46	51,282,650	11.8	No

<sup>1</sup> The emission factors for the washers and dryers represent test data from an Aramark facility in Terre Haute, IN on July 18, 2015, for laundering of shop towels and a safety factor increase of 25%. Test results were reported "as carbon". The conversion from "as carbon" to "as propane" is the ratio of % carbon in carbon to % carbon in propane or 100/81.714 = 1.224.

<sup>2</sup> The number of loads are based on washer and dryer physical and operational design. The maximum number of loads that can be processed depends on the capacities of the dryers as a bottleneck. All shop towels washed are assumed dried. This scenario is reflected in Table 1 PTE calculations.

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

<sup>3</sup> The VOCs from Detergent Usage Determined through Mass Balance includes usages from washing all other soiled materials being

<sup>4</sup> All Other processes associated with Washer/Dryer operation = represents the "All Other" category (including but not limited to fugitive VOC emissions from unloading washers, pretreatment of wastewater, wastewater transport through floor trenches, etc...). IDEM has determined that these emissions are equivalent to approximately 16% of the washer/dryer process emissions based on a review of all existing Industrial Laundry stack test data, and more specifically, observations made during stack tests conducted at the G&K Services Industrial Towel Laundering facility, located in Manchester, NH, by TRC Environmental Corporation of Windsor CT, on May, 22, 2009, and the Coyne Textile Services Industrial Laundry facility, located in New Bedford, MA, by AECOM, on June 8, 2010. Taken from permit number F097-33212-00687, issued on 1/14/2014.

<sup>5</sup> Limited Capacity (lb SST/yr) is set at a number to limit source-wide < 100 tpy.

<sup>6</sup> The throughput of soiled other materials can only occur when shop towels are not being processed. Maximum throughput of soiled other materials is shown in Table 3.

<sup>7</sup> Limited Capacity (lb SST/yr) is set at a number that equals a Limited Dryer PTE for VOC of 24.9 tons/yr.

**Methodology**

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

**Appendix A: Emissions Calculations**  
**Mass Balance-Based Emission Factors - Other Merchandise**

**Company Name:** Aramark Uniform & Career Apparel, LLC  
**Source Address:** 2050 West Oliver Ave, Indianapolis, IN 46221  
**Permit Number:** 097-37472-00721  
**Reviewer:** Monica Dick

**Detergent Emission Factor based on Worst Case Laundry Formula**

<b>Laundry Category</b>	<b>G</b>
Detergent oz/CWT <sup>1</sup>	9
Booster oz/CWT <sup>2</sup>	3.9
Detergent lb VOC/CWT <sup>3</sup>	4.51E-03
Booster lb VOC/CWT <sup>4</sup>	4.13E-02
Total lb VOC/CWT <sup>5</sup>	0.05
<b>Total lb VOC/1000 lb Soiled Other Material<sup>6</sup></b>	<b>0.46</b>
Potential Throughput of Soiled Other Material (lbs-SOM/year) <sup>7</sup>	51,282,650

Assumes 100% VOCs in detergent/booster are emitted. Location of emissions not specified by this mass-balance approach.

(1) CWT = 100 pounds-soiled

(2) Two-part system is 70% detergent, 30% booster.  $\text{Booster oz/CWT} = \text{Detergent oz/CWT} / 0.7 * 0.3$ .

(3)  $\text{Detergent lb VOC/CWT} = \text{lb VOC/gal} * \text{gal/128 oz} * \text{oz/CWT}$ , where TCX-0L123 is 0.76% wt VOC with a specific gravity of 1.013.  
 $0.06 \text{ lb VOC/Gal} = 1.013 \text{ (sp. gr.)} * 8.334 \text{ lb/gal} * 0.76\% \text{ wt VOC}$

(4)  $\text{Booster lb VOC/CWT} = \text{lb VOC/gal} * \text{gal/128 oz} * \text{oz/CWT}$ , where TCX-6L125 is 16.8% wt VOC with a specific gravity of 0.98.  
 $1.37 \text{ lb VOC/Gal} = 0.98 \text{ (sp. gr.)} * 8.334 \text{ lb/gal} * 16.8\% \text{ wt VOC}$

(5)  $\text{Total lb VOC/CWT} = \text{Detergent lb VOC/CWT} + \text{Booster lb VOC/CWT}$

(6)  $\text{Total lb VOC/1000 lb-soiled other material} = \text{Detergent lb VOC/CWT} * 10$

(7) Category G laundry has a 0.8 load factor, 1.09 soil factor, and 37 minute cycle time.

$4,140 \text{ lbs-Clean Dry Weight (facility washer capacity)} * 0.8 \text{ (Load Factor)} * 1.09 \text{ (Soil Factor)} * 60\text{min} / 37\text{min (cycle time)} * 8,760 \text{ hrs/year} = 51,282,650 \text{ pounds-soiled material/year}$

**HAP Emissions From Washers and Dryers, Shop Towel Laundering**  
**Appendix A: Emissions Calculations**

**Company Name:** Aramark Uniform & Career Apparel, LLC  
**Source Address:** 2050 West Oliver Ave, Indianapolis, IN 46221  
**Permit Number:** 097-37472-00721  
**Reviewer:** Monica Dick

Compound (HAP)	Facility-wide Emission Factor <sup>1</sup> (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)
Methanol	6.05E-06	26,280,000	0.08	<b>14.62</b>
Hexane	2.77E-08		0.0004	
2-Butanone	1.06E-07		0.001	
Chloroform	8.05E-06		0.11	
Isooctane	4.23E-07		0.01	
Trichloroethylene	1.61E-06		0.02	
Toluene <sup>2</sup>	2.56E-04		3.36	
Tetrachloroethylene <sup>2</sup>	4.91E-04		<b>6.45</b>	
Ethylbenzene	1.43E-05		0.19	
Xylene <sup>2</sup>	3.35E-04		4.40	

<sup>1</sup> The facility-wide emission factor is based on stack test at the Aramark facility in Terre Haute, IN on July 18, 2015, and includes a 25% compliance assurance factor. The facility-wide emission factor includes emissions from the dryers plus 16%, and the washers plus 16%. The additional 16% was added to account for all other processes associated with washer/dryer operation.

<sup>2</sup> Data qualifiers were present in Terre Haute, IN test report for these compounds. Therefore, emission factors based on a stack test at the Cintas facility in Cumberland, RI, April 19, 2012, was used and includes a 25% compliance assurance safety factor.

**Methodology**

Unrestricted Potential to Emit (tpy) = Facility-wide unrestricted 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: Aramark Uniform & Career Apparel, LLC  
 Source Address: 2050 West Oliver Ave, Indianapolis, IN 46221  
 Permit Number: 097-37472-00721  
 Reviewer: Monica Dick

Dryer Duration (hr) =	0.75
Maximum No. of Loads (annual) =	11,680.00

## PM - PTE

Dryer ID	Maximum Capacity Pounds of Dry Shop Towels (lb of Shop Towel/load)	Maximum Capacity Pounds of Wet Laundry (lb of wet laundry/load)	Emission Factor (lb PM/lb of shop towel) <sup>2</sup>	Control Efficiency %	Potential to Emit after Controls (tons per year)	Potential to Emit After Controls (lb/hr)	Uncontrolled Potential to Emit (tons per year)	Uncontrolled Potential to Emit (lb/hr)
D1	600	1200	0.00078	80%	5.47	1.25	27.33	6.24
D2	400	800	0.00078	80%	3.64	0.83	18.22	4.16
D3	400	800	0.00078	80%	3.64	0.83	18.22	4.16
D4	100	200	0.00078	80%	0.91	0.21	4.56	1.04
Total (tons per year) =					11.93		59.67	

## PM10/PM2.5 - PTE

Dryer ID	Maximum Capacity Pounds of Clean Dry Laundry (lb of laundry/load)	Maximum Capacity Pounds of Wet Laundry (lb of wet laundry/load)	Emission Factor (lb PM10/lb of wet shop towel) <sup>2</sup>	Control Efficiency %	Potential to Emit after Controls (tons per year)	Potential to Emit After Controls (lb/hr)	Uncontrolled Potential to Emit (tons per year)	Uncontrolled Potential to Emit (lb/hr)
D1	600	1200	0.00003	80%	0.21	0.05	1.05	0.24
D2	400	800	0.00003	80%	0.14	0.03	0.70	0.16
D3	400	800	0.00003	80%	0.14	0.03	0.70	0.16
D4	100	200	0.00003	80%	0.04	0.01	0.18	0.04
Total (tons per year) =					0.46		2.30	

## Methodology

Potential to Emit Uncontrolled (tons per year) = Max. loads (annual) \* Maximum Capacity Pounds of Wet Laundry (lb of wet laundry/load) \* EF (lb/lb)/2000 / 20% efficiency)

Note: the emission factor is after controls and represents 80% control efficiency. This number (PTE Uncontrolled) was extrapolated to determine emissions prior to controls.

Potential to Emit Controlled (tons per year) = Max. loads (annual) \* Maximum Capacity Pounds of Wet Laundry (lb of wet laundry/load) \* EF (lb/lb)/2000

Maximum Capacity Pounds of Wet Laundry (lb of wet laundry/load) = Maximum Capacity Pounds of Dry Shop Towels (lb of Shop Towel/load) \* 2

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

<sup>2</sup> The emission factor for after control emissions was provided by the source:

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

Page 6 of 6, TSD App. A

MMBtu/hr	EU
10	Boiler
8.65	Dryers
0.4	Steam Tunnel
3.1	HVAC Units
22.15	Total

**Company Name:** Aramark Uniform & Career Apparel, LLC  
**Source Address:** 2050 West Oliver Ave, Indianapolis, IN 46221  
**Permit Number:** 097-37472-00721  
**Reviewer:** Monica Dick

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
22.15	1020	190.2

	Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.2	0.7	0.7	0.1	9.5	0.5	8.0

\*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 C

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

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

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

	HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
Potential Emission in tons/yr	1.997E-04	1.141E-04	7.134E-03	1.712E-01	3.234E-04	1.790E-01

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
Potential Emission in tons/yr	4.756E-05	1.046E-04	1.332E-04	3.614E-05	1.997E-04	5.212E-04

Methodology is the same as above

<b>Total HAPs</b>	<b>1.795E-01</b>
<b>Worst HAP</b>	<b>1.712E-01</b>

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

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



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

October 4, 2016

Mark Kissinger  
ARAMARK Uniform & Career Apparel, LLC  
2050 W Oliver Ave  
Indianapolis, IN 46221

Re: Public Notice  
ARAMARK Uniform & Career Apparel, LLC  
Permit Level: FESOP - Transition from MSOP  
Permit Number: 097 - 37472 - 00721

Dear Mark Kissinger:

Enclosed is a copy of your draft FESOP - Transition from MSOP, 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 October 8, 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 Indianapolis Central Library Branch, 40 East St. Clair Street 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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Governor

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Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

October 4, 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 ARAMARK Uniform & Career Apparel, LLC, 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 October 8, 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: FESOP - Transition from MSOP  
Permit Number: 097 - 37472 - 00721

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

October 4, 2016

To: Indianapolis Central Library Branch 40 East St. Clair Street 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: ARAMARK Uniform & Career Apparel, LLC**  
**Permit Number: 097 - 37472 - 00721**

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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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## Notice of Public Comment

**October 4, 2016**

**ARAMARK Uniform & Career Apparel, LLC**

**097 - 37472 - 00721**

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](mailto: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 10/4/2016 ARAMARK Uniform & Career Apparel LLC 097 - 37472 - 00721 (draft/		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Mark Kissinger ARAMARK Uniform & Career Apparel LLC 2050 W Oliver Ave Indianapolis IN 46221 (Source CAATS)									
2		Benjamin Silver GM ARAMARK Uniform & Career Apparel LLC 2050 W Oliver Ave Indianapolis IN 46221 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN 46204 (Library)									
5		Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
7		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
8		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)									
9		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)									
10		TGM Autumn Woods, Inc. 500 North Dearboen, Suite 400 Chicago IL 60654 (Affected Party)									
11		Patti Stickney Short Elliott Hendrickson, Inc. 6808 Odana Road, Suite 200 Madison WI 53719 (Consultant)									
12											
13											
14											
15											

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