Florida Department of

Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Teresa R. Knepper, P.E.
DATE: April 22, 2011
SUBJECT: Evaluation Summary for Steiner Corporation/Alsco, Inc.; Alsco, Tallahassee 0730065-005-AO, Leon County

We recommend issuing a permit to Steiner Corporation/Alsco, Inc. to operate their Alsco, Tallahassee facility. This permit follows 0730065-004-AO, effective June 6, 2006. There have not been any significant changes since the last renewal.

Process Description.
Alsco, Inc., is a commercial laundry facility. The plant primarily cleans tablecloths, napkins, and bedding. The facility does not clean any high-VOC (volatile organic compound) content laundry (i.e., clothes or rags from printing operations) and does not use perchloroethylene.

The facility uses one 17 MMBtu/hour boiler (N-27-64) to produce hot water for the laundering process. This boiler is equipped with a dual fuel burner, the primary fuel being natural gas. Only during times of natural gas curtailment, No. 2 fuel oil with a sulfur content of less than 0.5 percent by weight may be burned. There are also five natural gas burning dryers which are insignificant sources of emissions.

Pollution Control Equipment.
The facility uses lint filters on the dryer exhausts. Use of natural gas as the primary fuel constitutes BACT for the boiler under Rule 62-296.406, F.A.C.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	0.20	0.86	N/A	N/A
SO2	N/A	0.06	0.27	N/A	N/A
VOC	N/A	0.14	0.62	N/A	N/A
NOx	N/A	2.6	11.3	N/A	N/A
CO	N/A	2.2	9.5	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	Not more than 20% opacity	

Based on the permit application, received April 6, 2011 and emission calculations, this facility is not a major source of air pollution or a major stationary source.

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-296.406, F.A.C., which limits opacity and requires BACT for SO2 and PM, and in accordance with 40 CFR part 60 subpart Dc, being between 10 and 100 MMBtu/hour, and installed after June 9, 1989. However, since the boiler

is less than 30 MMBtu/hour and it burns natural gas as a primary fuel and No. 2 fuel oil (less than 0.5 percent sulfur) as a secondary fuel, it is only subject to record keeping and reporting requirements. On April 23, 2001, EPA granted a Department request to maintain monthly fuel usage records and semiannual reporting, as long as the facility certifies that No. 2 fuel oil, with sulfur content less than 0.5% by weight, would only be used during a natural gas curtailment. The certification letter is in the file.

Based on the information provided by the facility, all the dryers are exempt from permitting by Rule 62-210.300(3)(a)14, F.A.C. However, this exemption from permitting does not alleviate these units from complying with Section II Facility-Wide Conditions or Appendix G-1, General Conditions, of this permit. Dryer emissions must also be incorporated in any facility-wide emission calculations (for Title V determinations).

Compliance Monitoring.
Records of monthly fuel use are required to be maintained as well as fuel supplier certifications to verify the sulfur content of any fuel oil burned. Semiannual reports are required if fuel oil is burned and annual reports are required if no fuel oil is burned. VE testing is required prior to permit renewal.

Compliance History. In April of 2006, 2193 gallons of diesel were reported burned, but no record of notification to the Department is in the file. A subsequent inspection conducted on 6/26/08 noted that a gas curtailment had occurred in the April 8-11, 2008 timeframe and notification had not been made to the Department in a timely manner. Finally, the inspection report from April 16, 2010 recorded a minor non-conformance due to the facility not maintaining monthly records of natural gas usage. Apparently, the flow meter had been damaged during the 2008 curtailment and had never been repaired. Other than those issues, all inspection reports for the last five years have recorded that the facility was in compliance.

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test. There was no original construction permit for this facility.

TK/c