



Environmental Protection and Growth Management Department
POLLUTION PREVENTION DIVISION – AIR QUALITY PROGRAM
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF AIR CONSTRUCTION PERMIT

ISSUED TO:

PERMITTEE:

UniFirst Corporation
Authorized Representative:
Mr. Alex Dukeshire, General Manager
UniFirst Corporation
500 S.W. 13th Terrace
Pompano Beach, Florida 33069

AIRS ID NO: 0112751

FINAL Permit Number: 0112751-001-AC

Issue Date: June 5, 2015

Expiration Date: April 6, 2016

Facility Name: UniFirst Corporation – Pompano Beach

Location: 500 S.W. 13th Terrace, Pompano Beach, Broward County, Florida.

Project Description: Obtain an after-the-fact construction permit to operate an industrial laundry plant. UniFirst Corporation is also a supplier of uniforms, work wear and related products to businesses, providing a wide range of apparel from traditional uniforms, industrial wear, specialty and protective clothing to corporate casual and executive attire. In addition, UniFirst provides floor care and restroom products, including a range of mats, mops, soaps, air fresheners, and paper items, and provides rental wipers (often referred to as shop towels) to a variety of clients.

The Standard Industrial Classification (SIC) is 7218; and the North American Industrial Classification Standard (NAICS) Code is 812332. **Lat/Long:** 26°13'21.78" N / 80°08'72.08" W **UTM:** Zone 17; 585.8 km East; 2900.8 km North.

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (protection of air quality) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Pollution Prevention Division (PPD) and made a part hereof.

The permit is organized in Sections as follows:

1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions, Sections [A] to [B]
5. Appendix A- NSPS Subpart A – General Provisions
6. Appendix B - 40 CFR Part 60, Subpart Dc- Standards of Performance for Small Industrial, Commercial and Institutional Steam Generating Units,

Executed in Broward County, Florida

Robert C. Wong
Environmental Licensing Manager
Pollution Prevention Division

1. FACILITY DESCRIPTION

UniFirst Corporation is a supplier of uniforms, work wear and related products to businesses, providing a wide range of apparel from traditional uniforms, industrial wear, specialty and protective clothing to corporate casual and executive attire. UniFirst also provides floor care and restroom products, including a range of mats, mops, soaps, air fresheners, and paper items, and it provides rental wipers (often referred to as shop towels) to a variety of clients. The facility uses conventional industrial laundry equipment and methods, e.g., washing machines (or washers) and natural gas-fired dryers, to launder the apparel, mats, mops, and shop towels that it rents to customers. Compared to apparel, shop towels constitute a minor proportion of the volume of materials laundered at the facility. From receipt and throughout the washing and drying process, shop towels are segregated from apparel items and processed separately. Unlike shop towels, the other textiles laundered at the facility, such as shirts, coats, floor mats, aprons, coveralls, smocks and pants are not expected to come into contact with volatile organic compounds (VOC)-containing materials during normal use. Thus, it is expected that there would be no significant VOC or hazardous air pollutants (HAP) emissions during the laundering of these textiles.

General operations at the facility include receiving and sorting apparel and allied products, washing, drying and a variety of pressing, folding, and aggregating steps prior to returning the cleaned items to the customer.

Wastewater from the laundering process is pre-treated onsite prior to discharge to the North Regional Wastewater Treatment Plant (the local POTW) under Industrial User Wastewater Discharge Permit (Permit No. BCWWS-1149-11B).

The table below lists the principal pieces of process equipment operated at the facility.

ID #	Manufacturer	Capacity (Lbs.)	Max. Heat Input (BTU/hr.) *	Model Number
Dryer 1	Cissel	110	250,000	144FD42-G-R
Dryer 2	Challenge	600	2,900,000	CP-400Y-600S
Dryer 3	Challenge	600	2,900,000	CP-400Y-600S
Dryer 4	Brim	675	2,500,000	755-6022-602
Washer 1	Unimax	100	N/A	UW125PVQ
Washer 2	Unimax	100	N/A	UW125PVQ
Washer 3	Braun	400	N/A	200N0PP
Washer 4	Braun	400	N/A	200N0PP
Washer 5	Braun	400	N/A	200N0PP
Washer 6	Braun	600	N/A	400N00VP
Washer 7	Braun	600	N/A	400N00VP
Washer 8	Braun	600	N/A	400N00VP
Washer 9	Braun	600	N/A	400N00VP

Note: * BTU/hr. = British thermal units per hour

Operation of the industrial dryers identified on the table involves directing heated air through a perforated metal tumbler to dry the wet textiles. The dryer is directly heated by a natural gas-fired burner. Exhaust from the drying process passes through a lint trap before being vented to the atmosphere. The facility also operates a Cleaver Brooks natural gas-fired boiler rated at 10.46 million BTU per hour (MMBtu/hr.) heat input. This boiler is not subject to the area source MACT, 40 CFR 63 – Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters. It only burns natural gas; and as a gas-fired boiler defined under 40 CFR Part 63.11237, is exempt from 40 CFR Part 63, Subpart JJJJJ. Also, it is not subject to the major source MACT, 40 CFR 63 – Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters. Although, the facility is not considered

a major source (Title V) of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) based upon the potential emission calculations, they requested VOC, individual HAP and total HAP emission limitations below the major source (Title V) thresholds in order to avoid major source (Title V) applicable requirements. These limitations will allow the facility to be considered a synthetic minor source. Additionally, F.A.C. 62-296.406 – Fossil Fuel Steam Generators with less than 250 MMBTU/hr. Heat Input, New and Existing does not apply, because this boiler is exempt from F.A.C. Rule 62-296.300 (3) (a) (34) (g) – Categorical Exemption; the heat input is greater than 10 MMBTU/hr., but the maximum annual natural gas consumption is 90 million cubic feet, which is less than 150 million cubic feet natural gas consumption limit set by the rule. On the other hand, it is subject to 40 CFR Part 60 – Subpart Dc, Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units, because the heat input is greater than 10 MMBtu/hr.

In addition to the sources identified above, the facility operates a natural gas-fired Leonard steam tunnel Model VTP32, with a maximum heat input of 0.99 MBTU/hr.; which is an insignificant source of air emissions. The steam tunnel is utilized to remove wrinkles from apparel. Shop towels are not processed through the steam tunnel at the facility. The steam tunnel is exempt pursuant to 62-210.300(3) (a) 33, F.A.C., because its maximum heat input capacity is less than 10 MMBtu/hr.

There is no pollution control device, other than operational practices.

Figure 1 depicts the flow diagram for the facility.

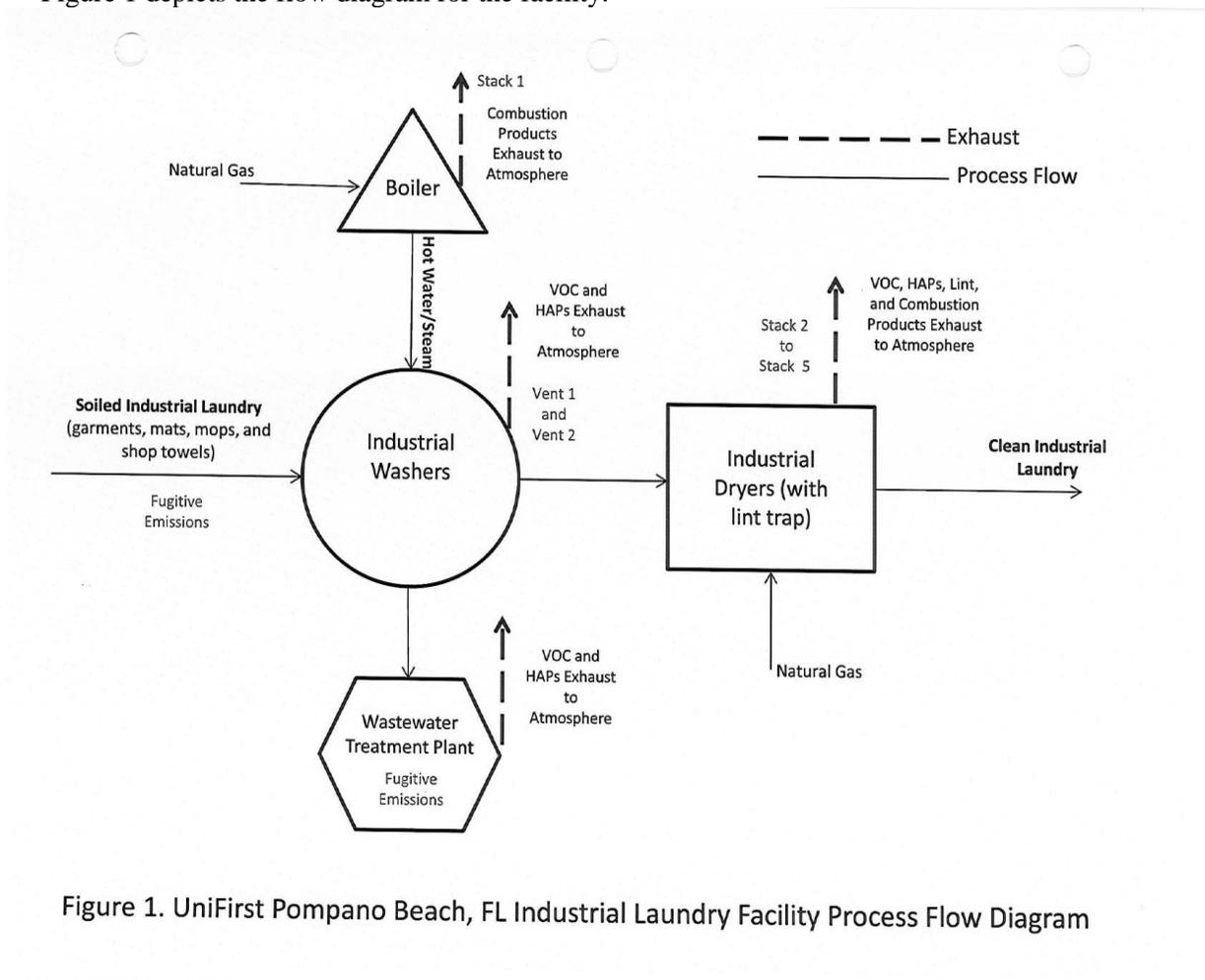


Figure 1. UniFirst Pompano Beach, FL Industrial Laundry Facility Process Flow Diagram

The facility consists of the following emission units:

<u>E.U. ID</u> <u>No.</u>	<u>Brief Description</u>
001	Fuel burning equipment consisting of a Cleaver Brooks natural gas-fired boiler with a rated capacity of 10.46 MMBtu/hr.
002	Nine (9) industrial washers with maximum capacity ranging from 100 through 600 pounds. Air emissions from the washers vent to two roof vent exhausts.
003	Four (4) industrial natural gas-fired dryers with maximum capacity ranging from 110 through 675 pounds and maximum heat input ranging from 250,000 through 2,900,000 Btu/hr. Air emissions from the dryers exhaust through a stack. Each dryer has its own stack. Exhaust passes through a lint trap prior to exhausting to the atmosphere. Shop towels laundering operation consisting of shop towel receiving/sorting; and shop towel washing.

Shop towel washer wastewater handling and wastewater treatment operation are insignificant sources of air emissions. This operation is regulated under Industrial User Discharge Permit No.: BCWWS-1149-11B).

2. GENERAL CONDITIONS

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the PPD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160 (1), F.A.C.]
2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPD.
[Rule 62-4.160 (2), F.A.C.]
3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
[Rule 62-4.160 (3), F.A.C.]
4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160 (4), F.A.C.]
5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPD.
[Rule 62-4.160 (5), F.A.C.]
6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPD and FDEP rules.
[Rule 62-4.160 (6), F.A.C.]

7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPD and FDEP rules.[Rule 62-4.160 (7), F.A.C.]
8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPD with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPD for penalties or for revocation of this permit.[Rule 62-4.160 (8), F.A.C.]
9. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPD immediately by phone at 954-519-1499 or by Email at PPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
[Rules 62-4.130 and 62-4.070(3), F.A.C.]
10. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPD, may be used by the PPD as evidence in any enforcement proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
[Rule 62-4.160 (9), F.A.C.]
11. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or FDEP rules.
[Rule 62-4.160 (10), F.A.C.]
12. Permit Transfer. This permit is transferable only upon PPD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPD.
[Rule 62-4.160 (11), F.A.C.]
13. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
[Rule 62-4.160 (12), F.A.C.]
14. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:
 - (a) Upon request, the Permittee shall furnish all records and plans required under FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPD.
 - (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These

materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPD rule.

- (c) Records of monitoring information shall include:
1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed.
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.
- [Rule 62-4.160 (14), F.A.C.]

15. Information Submittal. When requested by the PPD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPD, such facts or information shall be corrected promptly.
[Rule 62-4.160 (15), F.A.C.]
16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.
[Broward County Code, Sec. 27-173]

3. FACILITY-WIDE CONDITIONS

17. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C. and Broward County Code, Sec. 27-175(e)]
18. VOC or Organic Solvents Emissions. The owner or operator shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the PPD.

The owner or operator shall maintain shop towels in closed containers when being stored overnight, and implement other practices to minimize VOC emissions.

[Rule 62-296.320(1), F.A.C., Rule 62-4.070(3), F.A.C.]

19. Facility Wide VOC, Total HAP and Individual HAP Emissions. In order to avoid major source (Title V) applicable standards the permittee shall comply with the following:

VOC Emissions:

- Volatile organic compounds (VOC) emissions shall be less than 16 tons in any consecutive twelve-month period.

Individual HAP Emissions:

- Emissions shall be less than 1.40 tons in any consecutive twelve-month period.

Total HAP Emissions:

- Total HAP emissions shall be less than 3 tons in any consecutive twelve-month period.

[Rule 62-4.070(3) F.A.C., Rule 62-213.4220(3(c) 1, emissions limitations were requested by the applicant on the construction application received March 2, 2015]

20. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the outdoor atmosphere any air pollutants from sources, the opacity of which is equal or greater than 20 percent. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4) (b) (1), F.A.C., DEP Guidance, DARM-PER-33]

21. **Concealment.** No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.
[Broward County Code, Sec. 27-175(b)]
22. **Circumvention.** No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C and Broward County Code, Sec. 27-175(c)]
23. **Maintenance.** No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.
[Broward County Code, Sec. 27-175(d)]
24. **Special Compliance Tests.** When PPD after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a PPD rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions units to conduct compliance tests which identify the nature and quantity of pollutants emissions from the emissions unit and to provide a report on the results of said tests to the PPD.
[Rule 62-297.310(7) (b), F.A.C.]
25. **Operating Permit.** Sixty days before the expiration date of this construction permit, the permittee shall apply for an operation permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-4.090 F.A.C.]
{**Permitting Note:** The permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the <http://www.dep.state.fl.us/air/emission/epsap/default.htm> website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]
26. **Annual Operation Report (AOR).** The AOR shall be submitted to the PPD by April 1 of the following year. If the permittee elects to use FDEP’s electronic annual operation report software (EAOR), the report must be submitted directly to FDEP and there is no requirement to submit a copy to PPD.
[Rule 62-210.370(3), F.A.C.]
{**Permitting Note.** Information on the EAOR submittal is available at <http://www.dep.state.fl.us/air/emission/eaor/default.htm>}

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Fuel burning equipment consisting of a Cleaver Brooks natural gas-fired boiler with a rated capacity of 10.46 MMBtu/hr. heat input.

Permitting Note: The Cleaver Brooks natural gas-fired boiler is regulated under New Source Performance Standards (NSPS) -40 CFR 60 - Subpart Dc, Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units adopted and incorporated by reference in Rule 62-204.800, F.A.C. The boiler only combusts natural gas and thus it is not subject to the more stringent monitoring and recordkeeping requirements of Subpart Dc.

Appendix A – NSPS Subpart A – General Provisions and **Appendix B** – NSPS Subpart Dc are included for reference.

Operational Limitation

- A.1. Fuel used at the boiler shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C.]

Recordkeeping and Reporting Requirements

A.2. NSPS Subpart Dc Applicability:

The boiler is subject to all applicable requirements of 40 CFR 60, Subpart Dc, which applies to Small Industrial, Commercial, or Industrial Boilers. Specifically, the boiler shall comply with 40 CFR §60.48c Reporting and Recordkeeping Requirements. The facility will maintain records of the natural gas delivered to the facility, including the boiler, on a monthly basis.

[40 CFR §60.48c(g)(3), Control Number: 0000126, Region 4, Alternative Fuel Usage Recordkeeping, December 7, 2000, Control Number: 03000114, Region 10, Alternative Fuel Monitoring Plan for Boilers, July 10, 2003; and construction permit application received March 2, 2015]

A.3. Recordkeeping Requirements:

All records required under 40 CFR §60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
[40 CFR §60.48c (i)]

A.5. Reporting Requirements:

The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Department and shall be postmarked by the 30th day following the end of the reporting period.
[40 CFR §60.48c (j)]

Other Requirement

- A.6. The permittee shall calculate emissions of the pollutants emitted by the boiler on a consecutive twelve - month rolling period, in order to demonstrate compliance with Facility-wide Condition No. 19. All records shall be made available to PPD personnel upon request.
[Rule 62-4.070(3), F.A.C.]

Subsection B. This section addresses the following emissions unit:

E.U. ID No.	Brief Description
002	Nine (9) industrial washers with maximum capacity ranging from 100 through 600 pounds. Air emissions from the washers vent to two roof vent exhausts.
003	Four (4) industrial natural gas-fired dryers with maximum capacity ranging from 110 through 675 pounds and maximum heat input ranging from 250,000 through 2,900,000 Btu/hr. Air emissions from the dryers exhaust through a stack. Each dryer has its own stack. Exhaust passes through a lint trap prior to exhausting to the atmosphere. Shop towels laundering operation consisting of shop towel receiving/sorting; and shop towel washing.

Operational Limitations

- B.1** Fuel used at the washers and dryers shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C.]
- B.2** The shop towels to be laundered at the facility shall be limited to 3,500,000 pounds per year.
[Rule 62-4.070(3) F.A.C., and construction permit application received March 2, 2015]

Recordkeeping and Notification Requirements

- B.3** The permittee shall maintain records of the maintenance for the washers and dryers.
[Rule 62-4.070(3) F.A.C.]
- B.4** The permittee shall keep records of the usage rate of shop towel usage on a calendar-month basis; and shall calculate VOC, individual HAP and total HAP emissions on a consecutive twelve - month rolling period in order to demonstrate compliance with Facility-wide Condition No. 19.
[Rule 62-4.070(3) F.A.C.]
- B.5** The permittee shall keep records of the amount of shop towels processed on a consecutive twelve- month rolling period.
[Rule 62-4.070(3), F.A.C.]
- B.6** The permittee shall notify PPD of any change in VOC and/or HAP-containing soiled textile laundered at the facility and/or fuel used at the dryers for approval prior to use.
[Rule 62-4.070(3), F.A.C.]
- B.7** The permittee shall maintain the records required by this section for a period of five (5) years from the date the records were created and be made available for PPD staff review, if necessary.
[Rule 62-4.070(3), F.A.C.]