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James Buckman
Director of Environmental and Chemical Engineering
Cintas Corporation
27 Whitney Dr.
Milford, OH 45150

RE: Project No. 0571427-004-AC
Cintas Corporation located in Tampa, FL
Additional Dryer

Dear Mr. Buckman:

On December 27, 2017, you submitted an application to install a fifth, natural gas fired dryer at your industrial laundry facility. This existing facility is located in Hillsborough County at 3735 Corporex Park Dr., Tampa, FL 33619.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact Diana M. Lee, P.E., Chief, Air Permitting, at (813) 627-2600 ext. 1276 or by email at lee@epchc.org.

Executed in Tampa, Florida.

Sincerely,

Janet L. Dougherty

Janet L. Dougherty
Executive Director

Enclosures

JLD/LAW/law

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:
Cintas Corporation
27 Whitney Dr.
Milford, OH 45150

Authorized Representative:
James Buckman, Director of Environmental and Chemical Engineering

Project No. 0571427-004-AC
Minor Air Construction Permit

Additional Dryer
Hillsborough County, Florida

Facility Location: Cintas Corporation operates the existing facility, which is located in Hillsborough County at 3735 Corporex Park Dr. in Tampa, Florida 33619.

Project: This permit authorizes the facility to install a fifth, natural gas fired dryer, with a capacity of 600 pounds per load. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air operating permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical and mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813-627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the draft permit, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance the project will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the draft permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the draft permit, the Permitting Authority shall revise the draft permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-260 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

Janet L. Dougherty

Janet L. Dougherty
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written notice of Intent to Issue Air Permit package (including the Public Notice of Intent to Issue Air Permit and the draft permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

James Buckman, Cintas Corporation – buckmanj@cintas.com
Jeffrey Klaiber, P.E., Haley & Aldrich, Inc. – Jklaiber@haleyaldrich.com
Mike Deffenbaugh, Cintas Corporation – DeffenbaughW@cintas.com

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Sahmed Nasseri 1/24/18

Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Draft Air Permit No. 0571427-004-AC
Cintas Corporation
Hillsborough County, FL

Applicant: The applicant for this project is Cintas Corporation. The applicant's authorized representative and mailing address is: James Buckman, Director of Environmental and Chemical Engineering, 27 Whitney Dr. Milford, OH 45150.

Facility Location: Cintas Corporation operates the existing facility, which is located in Hillsborough County at 3735 Corporex Park Dr., Tampa, FL 33619.

Project: This permit authorizes the facility to install a fifth, natural gas fired dryer, with a capacity of 600 pounds per load. Cintas Corporation will remain a synthetic minor source of air emissions.

Permitting Authority: Applications for air operating permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical and mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's phone number is 813-627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Federally Enforceable State Operation Permit, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: https://fldep.dep.state.fl.us/air/emission/apds/default.asp.

Notice of Intent to Issue Air Permit: he Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that the project will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing

must contain the information set forth below and must be filed (received) with the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2600 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

TECHNICAL EVALUATION

&

PRELIMINARY DETERMINATION

APPLICANT
Cintas Corporation
3735 Corporex Park Dr.
Tampa, FL 33619
Facility ID No. 0571427

PROJECT
Project No. 0571427-004-AC
Application for Minor Source Air Construction Permit
Additional Dryer

COUNTY
Hillsborough County, Florida

PERMITTING AUTHORITY
Environmental Protection Commission of Hillsborough County
3629 Queen Palm Dr.
Tampa, FL 33619

January 24, 2018

1. GENERAL PROJECT INFORMATION

- **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Cintas Corporation is an industrial laundry facility and is categorized under Standard Industrial Classification Code No. 7218 – Industrial Launderers. The existing facility is located in Hillsborough County at 3735 Corporex Park Dr, Tampa, FL 33619. The UTM coordinates of the existing facility are Zone 17, 349.0 km East, and 3100.0 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS), except for ozone. Hillsborough County is designated as an air quality maintenance area for ozone.

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This permit authorizes the installation of a fifth, natural gas fired dryer. The dryer will be a Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent, with a capacity of 600 pounds per load.

Processing Schedule

December 27, 2017 - Received the application for a minor source air pollution construction permit.
Not Applicable - Requested additional information.
December 27, 2017 - Application Complete.

2. DEPARTMENT REVIEW

This permit authorizes the installation of a fifth, natural gas fired dryer at Cintas Corporation, an industrial laundry facility. Cintas primarily processes soiled shop towels, print towels, mops, and garments (materials), although the facility may process additional types of soiled materials.

The process begins by receiving soiled materials by truck and manually sorting the materials. The soiled materials

are then placed in cloth sacks, which are hung from an overhead rack where they are weighed and temporarily stored until ready to be washed. The sacks are then emptied into one of nine washers. All of the washers operate on electrical power.

After the wash cycle is complete, the facility operates four existing dryers to dry the materials. Three of the dryers can process up to 700 pounds per load each (in clean, dry weight equivalents), with cycle times that vary from 25 minutes to 45 minutes, depending on the material being processed. The fourth (smallest) dryer is typically used to dry garments only, although it is not limited to drying only garments. The fifth dryer that will be installed will be a Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent, with a capacity of 600 pounds per load. All of the dryers operate on natural gas with no backup fuel.

In addition to the dryers, the facility operates a natural gas fired Leonard Automatics, Model No. Special G32, steam tunnel. Cleaned materials (typically garments) are hung on hangers and pass through a large tunnel. The steam tunnel is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. – "Generic Emissions Unit or Activity Exemption". In addition to the dryers and the steam tunnel, some materials may be air dried.

Also, the facility uses a natural gas fired, 5.23 MMBtu/Hr Cleaver Brooks, Model No. CB200125, boiler with a stack economizer to provide steam for the steam tunnel and to heat the water that is used in the washers. The boiler does not have a backup fuel. The boiler is exempt from permitting pursuant to Rule 62-210.300(3)(a)33., F.A.C. – "Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour".

The facility is not requesting an increase in material throughput or in natural gas usage. Therefore, the potential emissions from the dryers (EU No. 002) remain at 49.5 tons/year of PM, 5.3 tons/year of HAPs, 3.5 tons/year of NOx, 2.9 tons/year of CO, and 0.02 tons/year of SO_2. The facility-wide VOC potential emissions remain at 80 tons/year.

The potential CO, NOx, and SO_2 emissions from all five dryers are calculated using emission factors from AP 42 Ch. 1.4 – Natural Gas Combustion and a maximum of 69.6 MMSCF of natural gas per twelve month period. In addition, the potential PM emissions from all five dryers are based on a maximum throughput of 51,876,720 pounds of soiled mops and an emission factor of 0.0019 pounds PM per pound of soiled mops processed. The emission factor is from a stack test performed at a G&K industrial laundry facility located in New Hampshire. The PM emissions from EU No. 002 also include emissions from the combustion of natural gas in the dryers.

Also, the potential VOC emissions are based on a maximum throughput of 15,000,000 pounds of soiled shop towels and an emission factor of 6.8 pounds VOC per 1,000 pounds of soiled shop towels processed, which is worst case. The emission factor is from a stack test performed at a G&K industrial laundry facility in New Hampshire and includes emissions from the following operations: dryer (on) and dryer (off). The potential VOC emissions from EU No. 002 also include emissions from the combustion of natural gas in the dryers.

In order to provide operational flexibility to the facility, this permit includes a limit on the amount of mops that may be processed but does not include a throughput limit on the other types of materials. The print towels and shop towels have different VOC and HAP emission factors. Therefore, the facility may be able to handle a larger amount of one type of material and still maintain compliance with the VOC and HAP PTEs.

The facility is subject to Rule 62-296.320, F.A.C. – "General Pollutant Emission Limiting Standards". The facility is also subject to Rule 62-296.712, F.A.C. – "Miscellaneous Manufacturing Process Operations" based on the drying process, which emits PM emissions.

Summary of Emissions

Emission Unit No. 002

Pollutant	Potential Emissions (TPY)	Actual Emissions (TPY)	Increase in Emissions (TPY)	Allowable Emissions
CO	2.9	0.9	2.0	NA
NOx	3.5	1.0	2.5	NA
PM	49.5	2.9	46.6	NA
SO_2	0.02	0.01	0.01	NA
VOC	50.8	4.6	46.2	NA

- The Actual Emissions are based on the average of 2015 and 2016 AOR data.
- The potential CO, NOx, and SO_2 emissions for all five dryers are based on a limit of 69.6 MMSCF of natural gas per twelve month period and emission factors from AP 42 Ch. 1.4 – Natural Gas Combustion.
- The potential PM emissions for all five dryers are based on a maximum throughput of 51,876,720 pounds of soiled mops and an emission factor of 0.0019 pounds PM per pound of soiled mops processed. The emission factor is from a stack test performed at a G&K industrial laundry facility located in New Hampshire. The PM emissions from EU No. 002 also include emissions from the combustion of natural gas in the dryers.
- The potential VOC emissions are based on a maximum throughput of 15,000,000 pounds of soiled shop towels and an emission factor of 6.8 pounds VOC per 1,000 pounds of soiled shop towels processed. The emission factor is from a stack test performed at a G&K industrial laundry facility in New Hampshire and includes emissions from the following operations: dryer (on) and dryer (off). The potential emissions are based on the processing of shop towels, which represent the worst case for the dryers. The potential emissions from EU No. 002 also include emissions from the combustion of natural gas in the dryers.
- The facility-wide potential PM and VOC emissions are calculated to be 49.5 and 80.0 tons/year, respectively.

Local Requirements
Rules of the EPCHC, Chapter 1-3 - Stationary Air Pollution and Ambient Air Quality Standards

State Requirements
Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (RACT) Particulate Matter
Rule 62-296.712, F.A.C. – Miscellaneous Manufacturing Process Operations

Federal NSPS Provisions
NA

Other Draft Permit Requirements
NA

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Lora Webb is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting Lora

Webb or Diana M. Lee, P.E. Chief, Air Permitting, at (813) 627-2600 or by email at webbl@epchc.org or lee@epchc.org.

COMMISSION
Lesley "Les" Miller, Jr., Chair
Victor D. Crist, Vice-Chair
Ken Hagan
Al Higginbotham
Pat Kemp
Sandra L. Murman
Stacy White

EXECUTIVE DIRECTOR
Janet L. Dougherty

DIVISION DIRECTORS
Richard Tschantz, Esq.
Andy Schipfer, P.E.
Hooshang Boostani, P.E.
Jerry Campbell, P.E.
Sam Elrabi, P.E.

PERMITTEE

Cintas Corporation
27 Whitney Dr.
Milford, OH 45150

Air Permit No. 0571427-004-AC
Permit Expires: September 1, 2019
Minor Air Construction Permit

Authorized Representative:
James Buckman, Director of Environmental and Chemical Engineering

Cintas Corporation
Additional Dryer

PROJECT

This is the final air construction permit, which authorizes the facility to install a fifth, natural gas fired dryer, with a capacity of 600 pounds per load. The proposed work will be conducted at the existing Cintas Corporation facility, which is an industrial laundry facility categorized under Standard Industrial Classification Code No. 7218 – Industrial Launderers. The existing facility is located in Hillsborough County at 3735 Corporex Park Dr., Tampa, FL 33619. The UTM coordinates of the existing facility are Zone 17, 349.0 km East, and 3100.0 km North.

Statement of Basis

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality

Upon issuance of this final permit, any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

(DRAFT)

_____

Janet L. Dougherty
Executive Director

DRAFT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

James Buckman, Cintas Corporation – buckmanj@cintas.com
Jeffrey Klaiber, P.E., Haley & Aldrich, Inc. – Jklaiber@haleyaldrich.com
Mike Deffenbaugh, Cintas Corporation – DeffenbaughW@cintas.com

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(DRAFT)

_____ _____
Clerk Date

DRAFT

FACILITY DESCRIPTION

This permit authorizes the installation of a fifth, natural gas fired dryer at Cintas Corporation, an industrial laundry facility. Cintas primarily processes soiled shop towels, print towels, mops, and garments (materials), although the facility may process additional types of soiled materials.

The process begins by receiving soiled materials by truck and manually sorting the materials. The soiled materials are then placed in cloth sacks, which are hung from an overhead rack where they are weighed and temporarily stored until ready to be washed. The sacks are then emptied into one of nine washers. All of the washers operate on electrical power.

After the wash cycle is complete, the facility operates four existing dryers to dry the materials. Three of the dryers can process up to 700 pounds per load each (in clean, dry weight equivalents), with cycle times that vary from 25 minutes to 45 minutes, depending on the material being processed. The fourth (smallest) dryer is typically used to dry garments only, although it is not limited to drying only garments. The fifth dryer that will be installed will be a Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent, with a capacity of 600 pounds per load. All of the dryers operate on natural gas with no backup fuel.

In addition to the dryers, the facility operates a natural gas fired Leonard Automatics, Model No. Special G32, steam tunnel. Cleaned materials (typically garments) are hung on hangers and pass through a large tunnel. The steam tunnel is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. – "Generic Emissions Unit or Activity Exemption". In addition to the dryers and the steam tunnel, some materials may be air dried.

Also, the facility uses a natural gas fired, 5.23 MMBtu/Hr Cleaver Brooks, Model No. CB200125, boiler with a stack economizer to provide steam for the steam tunnel and to heat the water that is used in the washers. The boiler does not have a backup fuel. The boiler is exempt from permitting pursuant to Rule 62-210.300(3)(a)33., F.A.C. – "Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour".

PROPOSED PROJECT

The facility will install a fifth dryer, which will be a Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent, with a capacity of 600 pounds per load. The dryer will operate on natural gas with no backup fuel.

This project will modify the following emissions units.

EU No.	Emission Unit Description
002	Dryers

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

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1. Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the Environmental Protection Commission of Hillsborough County.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. As requested by the permittee, in order to limit the potential to emit and establish the facility as a synthetic minor for VOC and Hazardous Air Pollutants (HAP), the following emission limitations shall apply facility-wide per any twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200, F.A.C. and Permit No. 0571427-001-AC]

A) The facility wide potential VOC emissions, including VOC emissions due to the combustion of natural gas, shall not exceed 80.0 tons/year.
B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 5.6 tons for any individual HAP and less than 18.5 tons for any combination of HAPs.

8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Environmental Protection Commission of Hillsborough County. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

9. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297,

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F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(8)(c), F.A.C.]

10. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following: [Rule 62-296.320(4)(c), F.A.C. and Permit No. 0571427-001-AC]

A) Exercise good housekeeping at all times.
B) Remove and properly dispose of lint from the dryers on a regular basis.
C) Limit the amount of time the garage doors are left open when unloading materials.

11. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1), F.A.C. and Permit No. 0571427-001-AC]

A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
C) Immediately attend to all spills/waste as appropriate.

12. The permittee shall not 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.]

13. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

14. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

15. Application for Air Operating Permit: Subsequent to any construction, reconstruction or modification of a facility or emissions unit authorized by an air construction permit, and demonstration of compliance with the conditions of such air construction permit, the owner or operator of such facility or emissions unit shall obtain an initial air operation permit or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter and Chapter 62-4, F.A.C. The operating permit application shall be submitted within 60 days of completion of compliance testing or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rule 62-210.300(2), F.A.C.]

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A. EU No. 002 – Dryers

This section of the permit addresses the following emissions units.

EU No.	Description
002	Dryers

EQUIPMENT

A.1. Equipment Name: The permittee is authorized to install one Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent. [Rule 62-4.070(3), F.A.C. and Application No. 0571427-004-AC]

PERFORMANCE RESTRICTIONS

A.2. Permitted Capacity: In order to limit the potential to emit, as requested by the permittee, the maximum amount of mops (in soiled weight equivalents) processed through all five dryers shall not exceed 51,846,720 pounds per twelve consecutive month period. [Rule 62-4.070(3), F.A.C. and Permit No. 0571427-001-AC]

A.3. Authorized Fuel: In order to limit the potential to emit, as requested by the permittee, the following restrictions and limitations shall apply per any twelve consecutive month period in order to ensure compliance with Specific Condition No. 7: [Rule 62-4.070(3), F.A.C., Permit No. 0571427-001-AC, and Application No. 0571427-004-AC]

A) The maximum combined natural gas usage of the dryers (EU No. 002) shall not exceed 69.6 million cubic feet.
B) The dryers shall burn natural gas only or be electric powered.

A.4. Hours of Operation: The hours of operation of the facility are not limited. [Rule 62-4.070(3), F.A.C., Permit No. 0571427-001-AC, and Application No. 0571427-004-AC]

EMISSIONS STANDARDS

A.5. The permittee shall not cause, permit, or allow any visible emissions greater than 5 percent opacity from any dryer or any other activity at the facility. [Rule 62-296.712(2), F.A.C. and Permit No. 0571427-001-AC]

A.6. When calculating emissions in order to demonstrate compliance with Specific Condition No. 7, the emission factors listed below for each type of material shall be used. [Rule 62-4.070(3), F.A.C., Permit No. 0571427-001-AC, and Application No. 0571427-004-AC]

Material	Pollutant	Emission Factor for Dryer
Shop Towels	VOC	6.7 lb/1,000 pounds of soiled towels
Print Towels	VOC	64.8 lb/1,000 pounds of soiled towels
Mops	PM	0.002 lb/pound of soiled mops

TESTING REQUIREMENTS

A.7. Initial Compliance Test: The Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent shall be tested to demonstrate compliance with the opacity standard (Specific Condition No. A.5.) within 60 days of startup. [Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]

A.8. Annual Compliance Tests: Test one dryer (EU No. 002) for visible emissions at the point of highest opacity during the drying of mops annually, once per calendar year (January 1 – December 31). Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of

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Hillsborough County within 45 days of such testing. The EPA Method 9 test for the emission units shall be a minimum of thirty (30) minutes in duration. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rule 62-297.310(5)(b) and (8)(a), F.A.C.]

A.9. Testing of emissions shall be conducted with the source operating at capacity. For the Brim, Model No. CPG6 600 lb, Pacesetter Dryer, or equivalent, capacity is defined as 90-100% of the rated capacity of drying 600 pounds (in clean, dry weight equivalents) of mops per load. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. [Rules 62-4.070(3) and 62-297.310(3), F.A.C.]

A.10. Test Requirements: At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPCHC, unless shorter notice is agreed to by the EPCHC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. In addition, tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.]

A.11. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [40 CFR 60.4244(a); Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

A.12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the following: [Rule 62-297.310(10), F.A.C.]

A) The make and model number of the dryer
B) The weight of the materials processed during the test
C) The temperature of the air in the dryer during the test

A.13. In order to demonstrate compliance with Section 2., Condition No. 7 and Specific Condition Nos. A.2. and A.3., the permittee shall maintain a monthly recordkeeping system for the most recent three year period. However, the facility should maintain daily records and make them available upon request. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

A) Month, Year
B) Amount of natural gas combusted in the dryers
C) Amount of soiled mops processed through the dryers (pounds)

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A. EU No. 002 – Dryers

D) Amount of soiled print towels processed through the dryers
E) Amount of soiled shop towels processed through the dryers
F) Monthly VOC emissions from the dryers
G) Rolling twelve month totals of B) through F) above

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