

## FINAL DETERMINATION

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### PERMITTEE

Cintas Corporation  
3735 Corporex Park Dr.  
Tampa, FL 33619

### PERMITTING AUTHORITY

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

### PROJECT

Air Permit No. 0571427-006-AC  
Minor Air Construction Permit

This permit authorizes the installation of two (2) new replacement dryers at Cintas Corporation, an industrial laundry facility.

### NOTICE AND PUBLICATION

The EPCHC distributed a draft minor air construction permit package on April 20, 2018. The applicant published the Public Notice in the La Gaceta newspaper on April 27, 2018. The EPCHC received the proof of publication on April 27, 2018. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

### COMMENTS

No comments on the Draft Permit were received from the public or the applicant.

### CONCLUSION

The final action of the Department is to issue the permit as drafted.

**COMMISSION**

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**PERMITTEE**

Cintas Corporation  
27 Whitney Drive  
Milford, OH 45150

Air Permit No. 0571427-006-AC  
Permit Expires: September 1, 2019  
Minor Air Construction Permit

*Authorized Representative:*

James Buckman, Director of Environmental and  
Chemical Engineering

Cintas Corporation  
Two (2) New Replacement Dryers

**PROJECT**

This is the draft air construction permit, which authorizes the facility to install two (2) new replacement natural gas fired dryers. 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 Drive, Tampa, FL 33619. The UTM coordinates of the existing facility are Zone 17, 349.0 km East, and 3100.0 km North.

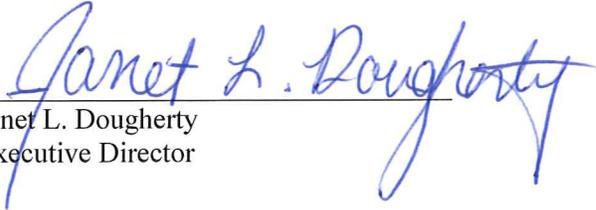
**STATEMENT OF BASIS**

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

  
Janet L. Dougherty  
Executive Director

*Environmental Excellence in a Changing World*

**Roger P. Stewart Center**

**3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - [www.epchc.org](http://www.epchc.org)**

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FINAL PERMIT

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**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](mailto:buckmanj@cintas.com)  
Jeffrey Klaiber, P.E., Haley & Aldrich, Inc. - [Jklaiber@haleyaldrich.com](mailto:Jklaiber@haleyaldrich.com)  
Mike Deffenbaugh, Cintas Corporation - [DeffenbaughW@cintas.com](mailto:DeffenbaughW@cintas.com)  
Van-Anh Thai, Cintas Corporation - [Thaiv@cintas.com](mailto:Thaiv@cintas.com)  
Marvin Scott, EEC, Inc. - [mscott@eec-tampabay.com](mailto:mscott@eec-tampabay.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.

*S. Nassen*

Clerk

*5/15/18*

Date

**SECTION 1. GENERAL INFORMATION (FINAL)**

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**FACILITY DESCRIPTION**

This permit authorizes the installation of two (2) new replacement dryers 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 (Dryers #1, #2 and #3) 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 Pony Dryer (smallest) is typically used to dry garments only, although it is not limited to drying only garments. 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 existing Dryer #2 will be replaced by a Jenson 800 dryer, Model T444, with a capacity of 800 pounds per load. The existing Dryer #3 will be replaced by a Jenson 450 dryer, Model T443, with a capacity of 450 pounds per load. The new replacement dryers 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.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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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), 62-210.200, F.A.C. and Permit Nos. 0571427-001/004-AC and Application No. 0571427-006-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](mailto: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,

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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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.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

### A. Operation of Natural Gas Fired 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 replace Dryer #2 with a Jenson 800 dryer, Model T444 and to replace Dryer #3 with a Jenson 450 dryer, Model T443. [Rule 62-4.070(3), F.A.C. and Application No. 0571427-006-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 four dryers shall not exceed 51,846,720 pounds per twelve consecutive month period. [Rule 62-4.070(3), F.A.C., and Permit Nos. 0571427-001/004-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., and Permit Nos. 0571427-001/004-AC]

- A) The maximum combined natural gas usage of the dryers (EU 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., and Permit Nos. 0571427-001/004-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., and Permit No. 0571427-001-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 two (2) new replacement dryers 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 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 Hillsborough County

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)**

**A. Operation of Natural Gas Fired Dryers**

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 Jenson 800 dryer, Model T444 and Jenson 450 dryer, Model T443, capacity are defined as 90-100% of the rated capacity of drying 800 and 450 pounds (in clean, dry weight equivalents) of mops per load, respectively. 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)

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)**

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**A. Operation of Natural Gas Fired 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