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ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Gerard Diruggiero
General Manager
UniFirst Corporation
6010 East Adamo Dr.
Tampa, FL 33619

RE: Hillsborough County Air Permitting

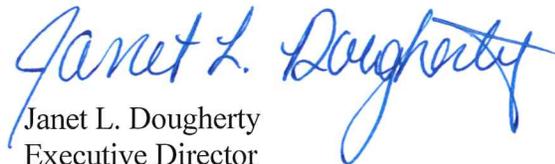
Dear Mr. Diruggiero:

Enclosed is Permit Number 0571451-001-AC for the after-the-fact construction of an industrial laundry facility, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,


Janet L. Dougherty
Executive Director

JDL/LAW/law

UniFirst Corporation
Tampa, FL 33619

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cc: Florida Department of Environmental Protection (posting online)
Elaina Modlin, P.E. – Geosyntec Consultants (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on 8/24/15 to the listed persons.

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



Clerk

8/24/15

Date

FINAL DETERMINATION

FOR

UniFirst Corporation

Hillsborough County

Construction Permit

Application Number

0571451-001-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

August 24, 2015

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on May 12, 2015 that included an Intent to Issue Permit No. 0571451-001-AC to UniFirst Corporation. The facility is located at 6010 East Adamo Dr., Tampa, Hillsborough County, FL, 33619. This permit authorizes the after-the-fact construction of an industrial laundry facility. The facility processes soiled shop towels, mops, and garments (materials). The facility does not process print towels.

The Public Notice of Intent to Issue was published in the La Gaceta on August 7, 2015.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted with the changes noted above.



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PERMITTEE:

UniFirst - Tampa
6010 East Adamo Dr.
Tampa, FL 33619

PERMIT/CERTIFICATION

Permit No: 0571451-001-AC
County: Hillsborough
Expiration Date: November 15, 2016
Project: Industrial Laundry Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part of hereof and specifically described as follows:

This permit authorizes the after-the-fact construction of an industrial laundry facility. UniFirst Corporation is an industrial laundry facility that launders apparel, garments, mats, mops, and shop towels (materials) using industrial sized washers and natural gas fired dryers. Compared to apparel and other items, shop towels constitute a minor proportion of the volume of materials laundered at the facility. The facility does not process print towels.

Materials are received by truck and manually sorted based on color and type of material. The materials are then placed in cloth sacks, which are hung from an overhead rack where they are temporarily stored until ready to be washed. The sacks are then emptied into one of eight washers. The washer capacities vary from 125 pounds of dry material to 650 pounds of dry material. All eight washers can operate at one time if needed and each washer can wash any type of material. All of the washers, which operate on electrical power provided by TECO, vent indoors.

When the washing cycle has finished, an operator opens the washer door and manually unloads the clean materials onto a moveable conveyor system. The conveyor system then moves in front of an empty dryer and the conveyor loads the materials into the dryer. There are five natural gas fired dryers that can operate at a maximum temperature of 160°F. The dryer capacities vary from 170 pounds of dry material to 600 pounds of dry material. Each dryer has its own stack which vents outdoors through the roof of the building.

The washers and dryers are controlled by a computer system. The washing and drying times are calculated by the computer and vary based on the type of material that is being washed and dried. The detergent for the washers is stored in enclosed tanks and is pumped to each washer as determined by the computer system.

An agency with values of environmental stewardship, fairness, and cooperation

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

An Affirmative Action / Equal Opportunity Employer

In addition to the dryers, the facility operates a natural gas fired Leonard, Model No. VTP32, steam tunnel. Cleaned materials (typically garments) are hung on hangers and pass through a large tunnel. The tunnel uses steam from the boiler, described below, to remove wrinkles from the items in lieu of manually ironing them. The steam tunnel can be used instead of a dryer (i.e., the wet materials are placed directly into the steam tunnel) or can be used in addition to the dryer (i.e., the materials are partially dried in the dryer and finish drying in the steam tunnel).

Also, the facility operates a natural gas fired, 8.22 MMBtu/Hr Johnston Boiler Co., Model No. PFTA200-4G-150S, boiler to provide steam for the steam tunnel and the hot water that is used in the washers. The boiler does not have a backup fuel.

The boiler is exempt from 40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units” pursuant to 60.40c(a) because it has a design heat input less than 10 MMBtu/Hr. Also, the boiler is exempt from 40 CFR 63 Subpart JJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources” pursuant to 40 CFR 63.11195(e) and 40 CFR 63.11237 because it meets the definition of a gas-fired boiler. In addition, 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” because the boiler is rated at less than 10.0 MMBtu/Hr and is fired on natural gas only.

Also, the steam tunnel is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. – “Generic Emissions Unit or Activity Exemption” since it would neither emit nor have the potential to emit 5.0 tons per year or more of any regulated air pollutant other than lead and HAPs.

Location: 6010 East Adamo Dr., Tampa, FL, 33619

UTM: 17- 363.5E and 3092.9N

NEDS No: 1451

Emission Unit Nos.:

001 – Industrial Washers

002 –Natural Gas Fired Dryers

Replaces Permit No.: NA

References Permit No.: NA

PERMITTEE:
UniFirst Corporation

PERMIT/CERTIFICATION NO.: 0571451-001-AC
PROJECT: Industrial Laundry Facility

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. 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.]
5. As requested by the permittee, in order to limit the potential to emit for Hazardous Air Pollutants (HAP), the HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons for any individual HAP and less than 25 tons for any combination of HAPs in any 12 consecutive month period. [Rules 62-212.300, 62-210.200, and 62-4.070(3), F.A.C.]
6. The permittee shall not cause, permit, or allow any visible emissions greater than 20 percent opacity from EU Nos. 001 and 002 or any other activity at the facility. [Rule 62-296.320(4)(b)1., F.A.C.]
7. The hours of operation of the facility are not limited. [Rule 62-4.070(3), F.A.C.]
8. In order to ensure compliance with Specific Condition No. 5, the following restrictions and limitations shall apply per any twelve consecutive month period: [Rule 62-4.070(3), F.A.C.]
 - A) The facility-wide throughput of soiled shop towels shall not exceed 3,500,000 pounds.
 - B) The maximum combined natural gas usage of the dryers (EU No. 002) shall not exceed 94.9 million cubic feet.
 - C) The maximum amount of dust mops processed through the dryers shall not exceed 12,000,000 pounds (on a soiled dust mop basis).
 - D) The dryers shall burn natural gas only or be electric powered.
 - E) The washers shall be electric powered only.
9. Test one dryer (EU No. 002) for visible emissions at the point of highest opacity during the drying of dust mops, within 60 days of issuance of this permit and annually thereafter. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of 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. [Rules 62-297.310(5)(b), 62-297.310(8)(a)3., and 62-297.310(10), F.A.C. and Ch. 1-3.52(3) of the

PERMITTEE:
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SPECIFIC CONDITIONS:

Rules of the EPCHC]

10. Compliance with the emission limitations of Specific Condition No. 6 shall be determined using EPA Method 9, contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3) and 62-297.310, F.A.C.]

11. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the rated capacity of processing a maximum of 600 pounds of dried dust 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. Failure to submit the weight of the materials processed during the test may invalidate the test. [Rules 62-4.070(3) and 62-297.310(3)(b), F.A.C.]

12. At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPC, unless shorter notice is agreed to by the EPC. 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 EPC a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the EPC by mutual agreement.. [Rule 62-297.310(9), F.A.C.]

13. In order to demonstrate compliance with Specific Condition Nos. 5 and 8, the permittee shall maintain a monthly recordkeeping system. The records shall be maintained onsite for three years and shall be made available to any local, 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), F.A.C.]

- A) Month/Year
- B) Amount of soiled shop towels processed through the washers and dryers
- C) Amount of dust mops processed through the dryers(on a soiled dust mop basis)
- D) Natural gas usage combusted in the dryers
- E) Rolling twelve month totals of B) through D) above

14. 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,

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storing and handling. Reasonable precautions shall include, but not limited to, the following: [Rule 62-296.320(4)(c), F.A.C.]

- A) Exercise good housekeeping at all times.
- B) Remove and properly dispose of lint from the dryers on a regular basis.

15. 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, 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.]

16. 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.]

- 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.

17. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(185), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment that would result in an increase in actual emissions.
- B) Installation or addition of any equipment which is a source of air pollution that would result in an increase in actual emissions.
- C) The in-kind replacement of washers and/or dryers is authorized, provided that the replacement equipment does not result in an increase in the heat input rate or capacity

18. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection

PERMITTEE:
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SPECIFIC CONDITIONS:

Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility.
[Rule 62-4.120, F.A.C.]

19. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

20. A minimum of two copies of an air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the compliance test or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY


Janet L. Dougherty
Executive Director

ATTACHMENT - GENERAL CONDITIONS

(1) 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 Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

(2) 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 Department.

(3) As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

(4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

(5) 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 Department rules, unless specifically authorized by an order from the Department.

(6) 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 Department rules. This provision includes 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 Department rules.

(7) The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, 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 Department rules. Reasonable time may depend on the nature of the concern being investigated.

ATTACHMENT - GENERAL CONDITIONS

(8) 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 the Department 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 and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

(9) In 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 source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

(10) The permittee agrees to comply with changes in Department 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 Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

(11) This permit is transferable only upon Department approval in accordance with Rules 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 is approved by the Department.

(12) This permit or a copy thereof shall be kept at the work site of the permitted activity.

(13) This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

(14) The permittee shall comply with the following:

- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- (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 recordings for continuous monitoring

ATTACHMENT - GENERAL CONDITIONS

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 Department 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.

(15) When requested by the Department, 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 Department, such facts or information shall be corrected promptly.