Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

10/9/2015

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Jim Buckman
Cintas - 11 Strongsville Rntl
27 Whitney Drive
Milford, OH 45150

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318558722
Permit Number: P0119104
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5*Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination (not applicable)

   Netting Determination (not applicable)

2. Source Description:

   Cintas – 11 Strongsville Rntl is an existing industrial laundering facility, which uses only non-VOC detergents and water to clean shop towels and other textile goods. In April, 2012, Cintas performed an emission testing at its Cumberland, Rhode Island facility as a result of a USEPA Region I request. The test result developed new emission factors for VOC and HAPs emissions for shop towels laundering, and Region I determined that the facility is a potential VOC major source for Title V purposes. Cintas – 11 Strongsville Rntl has been determined to be a true minor facility, with VOC potential emissions less than 100 tpy, taking into account the voluntary federally enforceable restriction of the pounds of soiled shop towels used.

   Cintas – 11 Strongsville Rntl currently has one 6.695 MMBtu/hr boiler (exempt), four 0.2 MMBtu/hr HVAC heaters (exempt), eleven roof top heaters 0.40 MMBtu/hr or less (exempt), one 0.604 MMBtu/hr steam tunnel (exempt), eight washers (de minimis), one 120 lbs dryer (de minimis), four 450 lbs dryers (P001, P002, P003 and P004), and a 150 gpm wastewater treatment system (P005).

   This PTIO, including 4 dryers and a 150 gpm wastewater treatment system (WWTS), proposes voluntary federally enforceable limitations to restrict facility-wide VOC emissions from shop towel laundering operations, as well as total soiled shop towels being laundered in the facility for the purpose of remaining a true minor facility.

3. Facility Emissions and Attainment Status:

   Cintas Strongsville facility is located at 8221 Dow Circle, Strongsville, Cuyahoga County.

   Cuyahoga County is currently designated as non-attainment for ozone (VOC and NO_x precursor), partial non-attainment for lead, and non-attainment for $PM_{2.5}$ (SO_2 and NO_x precursors).

   The facility is not a “Major Source” for any single HAP emissions and combined total HAPs emissions, and will not be a “Major Source” for VOC emissions based upon the voluntary federally enforceable restrictions. Calculations were performed at all the Ohio Cintas facilities, and per Engineering Guide 61, they are all considered true minors for Title V Purposes only. These facilities have actual VOC emissions that are less than 20 percent of the VOC major source threshold of 100 tpy. Cintas has agreed to maintain monthly records of VOC emissions to demonstrate that all their Ohio facilities remain under 20 tons VOC per rolling 12 month period.

4. Source Emissions:

   This PTIO contains terms and conditions that restrict the facility operations as follows:

   a. Laundering only shop towels, no print towels/furniture towels;
   b. The maximum 5,891,016 pounds of soiled shop towels per rolling, 12-month period to be laundered

facility-wide, which yield to no more than 20.0 tons actual VOC emissions per rolling, 12-month period, and monthly records to demonstrate compliance with these limits;

c. Not laundering shop towels that contain, or are saturated with, free liquid;
d. Use only non-VOC detergents and water for laundering; and
e. Separating soiled shop towels from other textile goods for processing.

5. Conclusion:

Conclusion:The emission limitations contained in this PTIO are adequate to provide federally enforceable limitations to ensure that the facility remains a true minor source when considering Title V. Permit should be issued in draft to ensure federal enforceability and to allow a comment period.

6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	20.0

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation
Cintas - 11 Strongsville Rntl
8221 Dow Circle,, Strongsville, OH 44136
ID#:P0119104
Date of Action: 10/9/2015
Permit Desc:Initial PTIO for four industrial laundry dryers (P001 - P004) equipped with lint filters and one wastewater treatment system (P005)..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Cintas - 11 Strongsville Rntl

Facility ID:	1318558722
Permit Number:	P0119104
Permit Type:	Initial Installation
Issued:	10/9/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Cintas - 11 Strongsville Rntl

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Authorization

Facility ID:	1318558722
Application Number(s):	A0053739
Permit Number:	P0119104
Permit Description:	Initial PTIO for four industrial laundry dryers (P001 - P004) equipped with lint filters and one wastewater treatment system (P005).
Permit Type:	Initial Installation
Permit Fee:	$2,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/9/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Cintas - 11 Strongsville Rntl
8221 Dow Circle
Strongsville, OH 44136

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119104
Permit Description: Initial PTIO for four industrial laundry dryers (P001 - P004) equipped with lint filters and one wastewater treatment system (P005).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P005**
Company Equipment ID:	EU5 - WWT
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: 450 lb/hr industrial dryers

Emissions Unit ID:	**P001**
Company Equipment ID:	EU1 - Dryer #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	EU2 - Dryer #2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	EU3 - Dryer #3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	EU4 - Dryer #4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) Sections B.2 – B.7.

2. The total actual emissions of Volatile Organic Compounds (VOCs) from emissions units P001 (450 pound capacity Dryer #1), P002 (450 pound capacity Dryer #2), P003 (450 pound capacity Dryer #3), P004 (450 pound capacity Dryer #4), P005 (150 gallons per minute Wastewater Treatment System), other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install or PTIO pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 20.0 tons per rolling, 12-month period.

3. The permittee shall not launder more than 5,891,016 pounds of soiled shop towels (SST) per rolling, 12-month period in this facility.

   a) The permittee shall not allow shop towels to be laundered in this facility that contain, or are saturated with, free liquid.

      (1) A shop towel is a piece of cotton fabric or other material that is used to clean equipment, parts, objects, or surfaces of general soil, grease, or oil and may contain small amounts of solvents containing volatile organic compounds (VOCs).

   b) The permittee shall process SST in this facility separately from other textile goods.

   c) The permittee shall only use non-VOC detergents and water to launder all the materials laundered in this facility.

   d) To ensure enforceability with the facility-wide restriction during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the facility-wide limitation levels specified in the following table:

Month	Maximum Allowable SST Laundered (cumulative lbs)	Maximum Allowable VOC Emissions (cumulative tons)
1	490,918	1.67
1 – 2	981,836	3.34

Month	Maximum Allowable SST Laundered (cumulative lbs)	Maximum Allowable VOC Emissions (cumulative tons)
1 – 3	1,472,754	5.00
1 – 4	1,963,672	6.68
1 – 5	2,454,590	8.35
1 – 6	2,945,508	10.02
1 – 7	3,436,426	11.69
1 – 8	3,927,344	13.36
1 – 9	4,418,262	15.03
1 – 10	4,909,180	16.70
1 - 11	5,400,098	18.34
1 - 12	5,891,016	20.00

After the first 12 calendar months of operation following issuance of this permit, compliance with the restrictions of the total SST laundered and VOC emissions shall be based upon a rolling, 12-month summation (current month plus previous 11 months) of the total SST laundered and VOC emissions collected and recorded as in section B.5.

4. The permittee shall not allow print towels or furniture towels to be laundered in this facility. Print towels or furniture towels that are received at this facility shall be bagged prior to being sent off-site for laundering at a non-Cintas facility.

   a) A print towel is a piece of cotton fabric or other material, received from a customer whose SIC Code is 27 (NAICS Code 323) or whose business is otherwise identifiable as printing or graphic arts, that is used to clean printing equipment, parts, objects, or surfaces and that contains any solvent with a flash point less than 140^0F.

   b) A furniture towel is a piece of cotton fabric or other material, received from a customer whose SIC Code is 25 (NAICS Code 337) or whose business is otherwise identifiable as wood furniture manufacturing or refinishing, that is used in the cleaning finishing or refinishing of wood furniture and that contains any solvent with a flash point less than 140^0F.

5. The permittee shall collect and record the following information each month for the entire facility:

   a) The total amount of SST laundered, in pounds;

   b) The rolling, 12-month summation of total SST laundered;

c) The monthly VOC emissions generated by SST laundering, in tons, calculated as follows:

$E_{MVOC} = [(M_{SST})(EF_w + EF_D + EF_T)/(1,000)] / 2,000$ pounds per ton

Where,

E_{MVOC} = the monthly VOC emissions facility-wide, in tons;

M_{SST} = the total amount of SST laundered in the facility, in pounds;

EF_W = VOC emission factor for washing SST, 0.42 pound VOC emissions per 1,000 pounds SST laundered, as determined based upon April 19, 2012 performance stack test conducted at Cintas Cumberland, Rhode Island facility in accordance with a Testing Order issued on August 3, 2011 by US EPA;

EF_D = VOC emission factor for drying SST, 4.59 pounds VOC emissions per 1,000 pounds SST laundered, as determined based upon April 19, 2012 performance stack test conducted at Cintas Cumberland, Rhode Island facility in accordance with a Testing Order issued on August 3, 2011 by US EPA;

EF_T = VOC emission factor for wastewater treatment system, 1.78 pounds VOC emissions per 1,000 pounds SST laundered, as determined based upon April 19, 2012 performance stack test conducted at Cintas Cumberland, Rhode Island facility in accordance with a Testing Order issued on August 3, 2011 by US EPA; and

d) The rolling, 12-month period total VOC emissions, in tons.

6. The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. The annual PER shall identify the following:

a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

(1) The permittee shall not launder more than 5,891,016 pounds of soiled shop towels (SST) per rolling, 12-month period in this facility.

(2) The total allowable emissions of VOCs shall not exceed 20.0 tons per rolling, 12-month period.

b) the probable cause of each deviation (excursion);

c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d) the magnitude and duration of each deviation (excursion).

7. Compliance with the emission limitation specified in B.2.and the operational restriction specified in B.3 shall be demonstrated by the recordkeeping specified in B.5.

C. Emissions Unit Terms and Conditions

1. P005, EU5 – Wastewater Treatment System

Operations, Property and/or Equipment Description:

Wastewater Treatment System: 150 GPM capacity

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 1.78 lbs / 1000 pounds SST laundered. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(F).
b.	OAC 3745-31-05(F) (Voluntary Restriction to Remain True Minor)	See B.2.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 1.78 lbs / 1000 pounds SST laundered.

<u>Applicable Compliance Method:</u>

The emission limitation was based upon April 19, 2012 performance stack test conducted at Cintas Cumberland, Rhode Island facility in accordance with a Testing Order issued on August 3, 2011 by US EPA.

If required, the following test method(s) shall be employed to demonstrate compliance with the allowable VOC emission rate(s): Method 18, Method 25 or Method 25A of 40 CFR Part 60, Appendix A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

2. Emissions Unit Group - 450 lb/hr industrial dryers #1, #2, #3, #4: P001, P002, P003, P004

EU ID	Operations, Property and/or Equipment Description
P001	Dryer #1: 450 pound capacity natural gas-fired
P002	Dryer #2: 450 pound capacity natural gas-fired
P003	Dryer #3: 450 pound capacity natural gas-fired
P004	Dryer #4: 450 pound capacity natural gas-fired

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b., b)(2)b., and g)(1)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	VOC emissions shall not exceed 4.59 lbs / 1000 pounds SST laundered. The requirements for VOC emissions established pursuant to this rule are equivalent to requirements of OAC rule 3745-31-05(F). See B.2. and b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC 3745-31-05(F) (Voluntary Restriction to Remain True Minor)	See B.2.
d.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 1.51 pounds per hour, in accordance with Table I requirements. See c)(1) and d)(1) – d)(3).
e.	OAC rule 3745-17-07(A)	The visible particulate emissions from any stack associated with the emissions unit shall not exceed twenty percent (20%) opacity, as a 6-minute average.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves OAC paragraph 3745-31-05 (A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. This rule paragraph applies once USEPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) as part of the Ohio SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC Emissions since the potential to emit is less than 10 tons per year.

c) Operational Restrictions

(1) The permittee shall operate a lint filter for this emissions unit to control particulate emissions whenever the emissions unit is in operation. The lint filter for each emissions unit shall be cleaned and maintained in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dryer and its lint filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct inspections of the lint filter while the emissions unit is shut down. The permittee shall perform any needed maintenance and repair for the emissions unit including lint filter to ensure that it is operated in accordance with the manufacturer's recommendations.

(3) The permittee shall document each inspection of the lint filter and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland Division of Air Quality.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

VOC emissions shall not exceed 4.59 lbs / 1000 pounds SST laundered.

<u>Applicable Compliance Method:</u>

This emission limitation was established based upon April 19, 2012 performance stack test conducted at Cintas Cumberland, Rhode Island facility in accordance with a Testing Order issued on August 3, 2011 by US EPA.

If required, the following test method(s) shall be employed to demonstrate compliance with the allowable VOC emission rate(s): Method 18, Method 25 or

Method 25A of 40 CFR Part 60, Appendix A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Opacity Limitation:

The visible particulate emissions from any stack associated with the emissions unit shall not exceed twenty percent (20%) opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

c. Emission Limitation:

Particulate emissions from each emissions unit (dryer) shall not exceed 1.51 pounds per hour.

Applicable Compliance Method:

The emission limitation was established based upon OAC rule 3745-17-11 Table I requirements as follows:

$E = 4.10(P)^{0.67}$

Where,

E = Allowable emission rate, in pounds per hour; and

P = Process weight rate, 0.225 ton per hour, which is determined based upon facility provided information of maximum 450 pounds per hour capacity for this emissions unit.

If required, the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5, Particulates, 40 CFR Part 60, Appendix A

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.