



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

11/24/2015

Certified Mail

Earl Harris
 UniFirst Corporation - Brooklyn Hgts
 1450 East Granger Road
 Brooklyn Heights, OH 44131

| | |
|----|------------------------------------|
| 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 |

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

Facility ID: 1318118705
 Permit Number: P0118972
 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 and Cleveland Division of Air Quality
 Permit Review/Development Section 2nd Floor
 Ohio EPA, DAPC 75 Erieview Plaza
 50 West Town Street Suite 700 Cleveland, OH 44114
 PO Box 1049
 Columbus, Ohio 43216-1049

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:

UniFirst Corporation is an existing industrial laundering facility, which uses only non-VOC detergents and water to clean shop towels and other textile goods. In December, 2012, UniFirst performed an emission testing at its Portland, Maine facility as a result of a USEPA request. The test result developed new emission factors for VOC and HAP emissions for shop towels laundering and were used in the development of this permit. UniFirst 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 laundered.

UniFirst currently has one 8.4 mmBtu/hr boiler (exempt), six 115,000 mmBtu/hr or less HVAC units (exempt), five 300,000 mmBtu/hr or less space heater units (exempt), one 1.2 mmBtu/hr steam tunnel (exempt), ten washers, five dryers, and one 27 gpm wastewater treatment system.

This PTIO, including ten washers (P006 – P015), five dryers (P001 – P005) and one 27 gpm wastewater treatment system (P029), proposes voluntary federally enforceable limitations to restrict facility-wide VOC/HAP 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 in accordance with Ohio EPA's Engineering Guide 61.

3. Facility Emissions and Attainment Status:

UniFirst is located at 1450 East Granger Road, Brooklyn Heights, Ohio, 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} (SO₂ 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. Actual and potential emission calculations for VOC and HAP emissions were performed for the facility. In accordance with Engineering Guide 61, UniFirst is considered a true minor for Title V purposes only. The facility has actual VOC emissions that are less than 20 percent of the VOC major source threshold of 100 TPY, and actual HAP emissions that are less than 20 percent of the major thresholds of 10 TPY (single) and 25 TPY (combined). UniFirst has agreed to maintain monthly records of VOC/HAP emissions to demonstrate that the facility remains under 9.9 tons VOC/HAP 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 2,100,000 pounds of soiled shop towels per rolling, 12-month period to be laundered facility-wide, which yield to no more than 9.9 tons actual VOC/HAP 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.
- e. Separating soiled shop towels from other textile goods for processing.

5. Conclusion:

The rolling 12-month emission limitations and operating restrictions contained in this PTIO are adequate to provide federally enforceable limitations to ensure that the facility remains a true minor source so that it is not subject to the Title V permitting requirements. This PTIO permit has been issued Draft in order to ensure federal enforceability of the emission limits and operating restrictions, and to allow for the 30-day public comment period.

6. Please provide additional notes or comments as necessary:

None.

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC/HAP | 9.9 |

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

UniFirst Corporation - Brooklyn Hgts

1450 East Granger Road,, Brooklyn Heights, OH 44131

ID#:P0118972

Date of Action: 11/24/2015

Permit Desc:Initial PTIO for industrial laundry equipment including wastewater treatment (P029), five natural gas dryers (P001 - P005), and ten washing machines (P006 - P015). The equipment is used to launder apparel, mats, mops and shop towels..

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
UniFirst Corporation - Brooklyn Hgts**

| | |
|----------------|-----------------------------------|
| Facility ID: | 1318118705 |
| Permit Number: | P0118972 |
| Permit Type: | Initial Installation |
| Issued: | 11/24/2015 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



Division of Air Pollution Control
Permit-to-Install and Operate
for
UniFirst Corporation - Brooklyn Hgts

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Draft Permit-to-Install and Operate

UniFirst Corporation - Brooklyn Hgts

Permit Number: P0118972

Facility ID: 1318118705

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318118705
Application Number(s): A0053552
Permit Number: P0118972
Permit Description: Initial PTIO for industrial laundry equipment including wastewater treatment (P029), five natural gas dryers (P001 - P005), and ten washing machines (P006 - P015). The equipment is used to launder apparel, mats, mops and shop towels.
Permit Type: Initial Installation
Permit Fee: \$3,200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/24/2015
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:

UniFirst Corporation - Brooklyn Hgts
1450 East Granger Road
Brooklyn Heights, OH 44131

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 Erieview Plaza
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: P0118972

Permit Description: Initial PTIO for industrial laundry equipment including wastewater treatment (P029), five natural gas dryers (P001 - P005), and ten washing machines (P006 - P015). The equipment is used to launder apparel, mats, mops and shop towels.

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

| | |
|-----------------------------------|----------------------|
| Emissions Unit ID: | P029 |
| Company Equipment ID: | Wastewater treatment |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

Group Name: Washers & Dryers (2006-pres)

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | P001 |
| Company Equipment ID: | Dryer 1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P002 |
| Company Equipment ID: | Dryer 2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P004 |
| Company Equipment ID: | Dryer 4 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P006 |
| Company Equipment ID: | Washer 1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P007 |
| Company Equipment ID: | Washer 2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P008 |
| Company Equipment ID: | Washer 3 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P009 |
| Company Equipment ID: | Washer 4 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

Group Name: Washers & Dryers (pre-2006)

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | P003 |
| Company Equipment ID: | Dryer 3 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| | P005 |



Draft Permit-to-Install and Operate

UniFirst Corporation - Brooklyn Hgts

Permit Number: P0118972

Facility ID: 1318118705

Effective Date: To be entered upon final issuance

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | |
| Company Equipment ID: | Dryer 5 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | |
| Company Equipment ID: | Washer 5 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | |
| Company Equipment ID: | Washer 6 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | |
| Company Equipment ID: | Washer 7 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | |
| Company Equipment ID: | Washer 8 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | |
| Company Equipment ID: | Washer 9 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | |
| Company Equipment ID: | Washer 10 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Draft Permit-to-Install and Operate
UniFirst Corporation - Brooklyn Hgts
Permit Number: P0118972
Facility ID: 1318118705
Effective Date: To be entered upon final issuance

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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



Draft Permit-to-Install and Operate

UniFirst Corporation - Brooklyn Hgts

Permit Number: P0118972

Facility ID: 1318118705

Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install and Operate
UniFirst Corporation - Brooklyn Hgts
Permit Number: P0118972
Facility ID: 1318118705
Effective Date: To be entered upon final issuance

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) B.2.a)(1), B.2.b)(1), B.3.a), B.4.a), B.5.a), and B.6.a)(1).

2. Applicable Emissions Limitations and/or Control Requirements

a) The specific operation(s), property, and/or equipment that constitute the facility along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Facility-wide emissions 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 |
|-----|--|---|
| (1) | OAC rule 3745-31-05(F) (Voluntary restriction to remain a true minor) | See B.2.b)(1) and B.3.a below. |

b) Additional Terms and Conditions

(1) The total facility-wide volatile organic compound (VOC) and combined hazardous air pollutant (HAP) emissions from laundering operations shall not exceed 9.9 tons per rolling, 12-month period. This includes emissions from all laundering emissions units identified in Section C of this permit, all emissions units that are De Minimis per OAC rule 3745-15-05, and all emissions units that are permanently exempt per OAC rule 3745-31-03(A)(1).

3. Operational Restrictions

a) The permittee shall not launder more than 2,100,000 pounds of soiled shop towels (SST) per rolling, 12-month period in this facility.

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

a. 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).

- (2) The permittee shall process SST in this facility separately from other textile goods.
- (3) The permittee shall only use non-VOC detergents and water to launder all the materials processed in this facility.
- (4) To ensure enforceability with the facility-wide restrictions 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 (lbs) | Maximum Allowable VOC / combined HAP Emissions (tons) |
|--------|---------------------------------------|---|
| 1 | 175,000 | 0.83 |
| 1 – 2 | 350,000 | 1.65 |
| 1 – 3 | 525,000 | 2.48 |
| 1 – 4 | 700,000 | 3.30 |
| 1 – 5 | 875,000 | 3.75 |
| 1 – 6 | 1,050,000 | 4.13 |
| 1 – 7 | 1,225,000 | 4.95 |
| 1 – 8 | 1,400,000 | 5.76 |
| 1 – 9 | 1,575,000 | 6.60 |
| 1 – 10 | 1,750,000 | 7.43 |
| 1 - 11 | 1,925,000 | 8.25 |
| 1 - 12 | 2,100,000 | 9.9 |

After the first 12 calendar months of operation following issuance of this permit, compliance with the restrictions of the total SST laundered and VOC/HAP emissions shall be based upon a rolling, 12-month summation (current month plus previous 11 months) of the total SST laundered and VOC/HAP emissions collected and recorded as in B.4.a).

- b) The permittee shall not allow print towels or furniture towels to be laundered in this facility. Print towels or furniture towels that are sent to this facility shall be bagged and stored outside in a covered area prior to being sent off-site for laundering at a non-UniFirst facility.
 - (1) 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°F.

- (2) 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°F.

4. Monitoring and/or Recordkeeping Requirements

a) The permittee shall collect and record the following information each month facility-wide:

- (1) the total amount of SST laundered, in pounds;
- (2) the rolling, 12-month summation of total SST laundered, in pounds;
- (3) the monthly VOC emissions generated by SST laundering, in tons, and shall be calculated as follows:

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

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, 1.02 pound VOC emissions per 1,000 pounds SST laundered, as determined based upon December 15, 2012 performance stack test conducted at UniFirst, Portland, Maine facility in accordance with a Testing Order issued on April 27, 2012 by US EPA;

EF_D = VOC emission factor for drying SST, 5.66 pounds VOC emissions per 1,000 pounds SST laundered, as determined based upon December 15, 2012 performance stack test conducted at UniFirst, Portland, Maine facility in accordance with a Testing Order issued on April 27, 2012 by US EPA; and

EF_T = VOC emission factor for wastewater treatment system, 2.12 pounds VOC emissions per 1,000 pounds SST laundered, as determined based upon December 15, 2012 performance stack test conducted at UniFirst, Portland, Maine facility in accordance with a Testing Order issued on April 27, 2012 by US EPA. The wastewater treatment system includes emissions from the EQ/DAF/sludge tanks, shaker screen, and settling tanks.

- (4) the rolling, 12-month period VOC emissions, in tons.

5. Reporting Requirements

a) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ). 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:

- (1) 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:
 - a. The permittee shall not launder more than 2,100,000 pounds of soiled shop towels (SST) per rolling, 12-month period in this facility.
 - b. Facility-wide VOC / combined HAP emissions shall not exceed 9.9 tons per rolling, 12-month period.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (4) the magnitude and duration of each deviation (excursion).
- b) 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 DAQ.

6. Testing Requirements

- a) Compliance with the Emissions Limitations and/or Control Requirements specified in B.2. of these terms and conditions shall be determined in accordance with the following methods:

(1) Emission Limitation:

The facility-wide VOC / combined HAP emissions from laundering operations shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in B.4.a) above.



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C. Emissions Unit Terms and Conditions



1. P029, Wastewater treatment

Operations, Property and/or Equipment Description:

Wastewater Treatment System (27 gallons per minute)

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)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 3745-31-03 (A)(3) June 30, 2008 | VOC emissions shall not exceed 2.12 pounds per 1,000 pounds of soiled shop towels (SST) laundered. The requirements of this rule include compliance with the requirements established pursuant to OAC rule 3745-31-05 (F). See b)(2)a. below. |
| b. | OAC rule 3745-31-05 (A)(3)(a)(ii) June 30, 2008 | See b)(2)b. and b)(2)c. below. |
| c. | OAC rule 3745-31-05 (F) (Voluntary Restriction to Remain True Minor) | See section B. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| d. | OAC rule 3745-114-01 | See g)(1) below. |

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (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. The requirements apply once U.S. EPA approves OAC paragraph 3745-31-05 (A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC emissions since the calculated annual emission rate is less than 10 tons per year, taking into account the voluntary emission restrictions from OAC rule 3745-31-05 (F).

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 Cleveland Division of Air Quality (Cleveland DAQ). 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 DAQ.

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:



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UniFirst Corporation - Brooklyn Hgts

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Facility ID: 1318118705

Effective Date: To be entered upon final issuance

a. Emission Limitation:

VOC emissions shall not exceed 2.12 pounds per 1000 pounds of SST laundered.

Applicable Compliance Method:

The emission limitation was based upon a December 2012 performance stack test conducted at the UniFirst Portland, Maine facility in accordance with a Testing Order issued 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 units' 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 federally enforceable permit to install and operate (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 P029 was installed in calendar year 2011.



2. Emissions Unit Group - Dryers (pre-2006): P003, P004, P005

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| P003 | Dryer 3, Challenge, 2.75mm BTU/hr |
| P004 | Dryer 4, Challenge, 2.75mm BTU/hr |
| P005 | Dryer 5, Challenge, 2.75mm BTU/hr |

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 5.66 pounds per 1,000 pounds of soiled shop towels (SST) laundered. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (F). See c)(1) below. |
| b. | OAC rule 3745-31-05 (F) (Voluntary Restriction to Remain True Minor) | See Section B. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| c. | 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. |
| d. | OAC rule 3745-17-11 | Particulate emissions from each emissions unit shall not exceed 1.83 pounds per hour. See b)(2)a. and b)(2)b. below. |
| e. | OAC rule 7345-114-01 | See g)(1) below. |

(2) Additional Terms and Conditions

- a. The uncontrolled particulate emission rate for each emissions unit is less than 10 pounds per hour, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 is not applicable to each emissions unit.
- b. Particulate emissions from each emissions unit shall not exceed 1.83 pounds per hour, in accordance with Table I requirements of OAC rule 3745-17-11.

c) Operational Restrictions

- (1) The permittee shall operate a lint filter for each emission unit to control particulate emissions whenever the emissions unit is in operation. The lint filter for each emissions unit shall be cleaned frequently and shall be 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 Cleveland Division of Air Quality upon request.
- (2) The permittee shall conduct periodic inspections and annual comprehensive inspection of the lint filter while the emissions unit is shut down. The permittee shall perform any needed maintenance and repair for each 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 (periodic and annual) of each 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 Cleveland Division of Air Quality.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality. 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 DAQ.

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 5.66 pounds per 1000 pounds of SST laundered.

Applicable Compliance Method:

The emission limitation was based upon a December 2012 performance stack test conducted at the UniFirst Portland, Maine facility in accordance with a Testing Order issued 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 shall not exceed 1.83 pounds per hour

Applicable Compliance Method:

The emission limitation was developed 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, 0.3 ton per hour, which is determined based upon facility information that a maximum of 600 pounds per hour of material is dried for each emissions unit.

If required, compliance shall be determined by performing a stack test using USEPA Method 5 of 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.
- (2) Emissions units P003 and P005 were installed in calendar year 1995, and emissions unit P004 was installed in calendar year 2002.

3. Emissions Unit Group - Washers (pre-2006): P011, P012, P013, P014 & P015

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| P011 | Washer 6, Washex, 450 lbs |
| P012 | Washer 7, Washex, 450 lbs |
| P013 | Washer 8, Washex, 450 lbs |
| P014 | Washer 9, Washex, 450 lbs |
| P015 | Washer 10, Washex, 450 lbs |

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 1.02 pounds per 1,000 pounds of soiled shop towels (SST) laundered. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (F). |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| b. | OAC rule 3745-31-05 (F) (Voluntary Restriction to Remain True Minor) | See Section B. |
| c. | OAC rule 3745-114-01 | See g)(1) below. |

(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 Cleveland Division of Air Quality. 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 DAQ.

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 1.02 pounds per 1000 pounds of SST laundered.

Applicable Compliance Method:

The emission limitation was based upon a December 2012 performance stack test conducted at the UniFirst Portland, Maine facility in accordance with a Testing Order issued by US EPA.



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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 units P011, P012, P013, P014, and P015 were installed in calendar year 1995.



4. Emissions Unit Group - Dryers (2006-pres): P001 & P002

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| P001 | Dryer 1, American Dryer Company, 550k BTU/hr |
| P002 | Dryer 2, American Dryer Company, 550k BTU/hr |

- 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)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) June 30, 2008 | VOC emissions shall not exceed 5.66 pound per 1,000 pounds of soiled shop towels (SST) laundered. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (F). See b)(2)a. and c)(1) below. |
| b. | OAC rule 3745-31-05 (A)(3)(a)(ii) June 30, 2008 | See b)(2)b., b)(2)c., and b)(2)d. below. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| c. | OAC rule 3745-31-05 (F) (Voluntary Restriction to Remain True Minor) | See Section B. |
| d. | 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. |
| e. | OAC rule 3745-17-11 | Particulate emissions from each emissions unit shall not exceed 1.83 pounds per hour. See b)(2)e. and b)(2)f. below. |
| f. | OAC rule 3745-114-01 | See g)(1) below. |

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (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. The requirements apply once U.S. EPA approves OAC paragraph 3745-31-05 (A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the particulate emissions since the potential to emit is less than 10 tons per year.
- d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC emissions since the calculated annual emission rate is less than 10 tons per year, taking into account the voluntary emission restrictions from OAC rule 3745-31-05 (F).
- e. The uncontrolled emission rate for each emissions unit is less than 10 pounds per hour, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 is not applicable to each emissions unit.
- f. Particulate emissions from each emissions unit shall not exceed 1.83 pounds per hour, in accordance with Table I requirements of OAC rule 3745-17-11.

c) Operational Restrictions

- (1) The permittee shall operate a lint filter for each emission unit to control particulate emissions whenever the emissions unit is in operation. The lint filter for each emissions unit shall be cleaned frequently and shall be 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 Cleveland DAQ upon request.
- (2) The permittee shall conduct periodic inspections and annual comprehensive inspection of the lint filter while the emissions unit is shut down. The permittee shall perform any needed maintenance and repair for each 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 (periodic and annual) of each 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 Cleveland DAQ upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality. 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 the Cleveland DAQ.

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 5.66 pounds per 1000 pounds of SST laundered.

Applicable Compliance Method:

The emission limitation was based upon a December 2012 performance stack test conducted at the UniFirst Portland, Maine facility in accordance with a Testing Order issued 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 shall not exceed 1.83 pounds per hour

Applicable Compliance Method:

The emission limitation was developed 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



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P = Process weight rate, 0.3 ton per hour, which is determined based upon facility information that a maximum of 600 pounds per hour of material is dried for each emissions unit.

If required, compliance shall be determined by performing a stack test using USEPA Method 5 of 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.
- (2) Emissions units P001 and P002 were installed in calendar year 2011.



5. Emissions Unit Group - Washers (2006-pres): P006, P007, P008, P009 & P010

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| P006 | Washer 1, Milnor, 80 lbs |
| P007 | Washer 2, Brim, 275 lbs |
| P008 | Washer 3, Brim, 675 lbs |
| P009 | Washer 4, Brim, 675 lbs |
| P010 | Washer 5, Brim, 675 lbs |

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)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) | VOC emissions shall not exceed 1.02 pounds per 1,000 pounds of soiled shop towels (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)a. and c)(1) below. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| b. | OAC rule 3745-31-05 (A)(3)(a)(ii) | See b)(2)b. and b)(2)c. below. |
| c. | OAC rule 3745-31-05 (F) (Voluntary Restriction to Remain True Minor) | See Section B. |
| d. | OAC rule 3745-114-01 | See g)(1) below. |

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (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. The requirements apply once U.S. EPA approves OAC paragraph 3745-31-05 (A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC emissions since the calculated annual emission rate is less than 10 tons per year, taking into account the voluntary emission restrictions from OAC rule 3745-31-05 (F).

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 Cleveland Division of Air Quality. 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 DAQ.

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 1.02 pounds per 1000 pounds of SST laundered.

Applicable Compliance Method:

The emission limitation was based upon a December 2012 performance stack test conducted at the UniFirst Portland, Maine facility in accordance with a Testing Order issued 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) These emissions units were installed during the following calendar years:

| | |
|------|------|
| P006 | 2012 |
| P007 | 2011 |
| P008 | 2013 |
| P009 | 2014 |
| P010 | 2014 |