# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

October 19, 2018

PERMIT TO INSTALL 80-18

**ISSUED TO**Cintas Corporation

LOCATED AT 51518 Quadrate Drive Macomb, Michigan

IN THE COUNTY OF Macomb

FRIS PENINSULA

# STATE REGISTRATION NUMBER P0696

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:  June 22, 2018		
DATE PERMIT TO INSTALL APPROVED: October 19, 2018	SIGNATURE:	
DATE PERMIT VOIDED:	SIGNATURE:	
DATE PERMIT REVOKED:	SIGNATURE:	

### **PERMIT TO INSTALL**

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### **Common Abbreviations / Acronyms**

Common Acronyms			Pollutant / Measurement Abbreviations
AQD Air Quality Division		acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	СО	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
СОМ	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit
department	Quality	gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H <sub>2</sub> S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental	NOx	Oxides of Nitrogen
MODO	Quality	ng	Nanogram
MSDS NA	Material Safety Data Sheet Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for	PM2.5	Particulate Matter equal to or less than 2.5
NCDC	Hazardous Air Pollutants		microns in diameter
NSPS NSR	New Source Performance Standards New Source Review	pph ppm	Pounds per hour Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
sc	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection	μg	Microgram
	Agency	μm	Micrometer or Micron
VE	Visible Emissions	voc	Volatile Organic Compounds Year
L	plicators, the procesure measured at the gur	yr	shall not avecad 10 psig

<sup>\*</sup>For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

#### **GENERAL CONDITIONS**

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. (R 336.1301)
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

#### **SPECIAL CONDITIONS**

#### **FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

# The following conditions apply Source-Wide to: FGFACILITY

#### **POLLUTION CONTROL EQUIPMENT:**

A lint filter for each dryer.

### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	Less than 89.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.4	R 336.1205(3)
2. Individual HAP	Less than 8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.5	R 336.1205(3)
3. Aggregate HAPs	Less than 22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.5	R 336.1205(3)

### II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
Soiled shop towels laundered	24,500,000 pounds per year	12-month rolling time period as determined at the end of each calendar month		SC VI.2	R 336.1205(3)
All textiles     laundered	74,500,000 pounds per year	12-month rolling time period as determined at the end of each calendar month		SC VI.2	R 336.1205(3)

#### III. PROCESS/OPERATIONAL RESTRICTIONS

#### IV. <u>DESIGN/EQUIPMENT PARAMETERS</u>

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))
- 2. The permittee shall keep monthly records for FGFACILITY of the weight, in pounds, of the following materials laundered during each calendar month and in the 12-month rolling time period ending that calendar month, using a method acceptable to the AQD District Supervisor.
  - a. Soiled shop towels
  - b. All textiles

The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(3))

- 3. The permittee shall monitor and record, in a satisfactory manner, the following information for fuels burned in FGFACILITY, on a monthly basis.
  - a. The types of fuels burned
  - b. The amount of each type of fuel burned

This requirement shall not apply for any month for which the AQD District Supervisor has approved calculating emissions from fuel combustion based on the equipment's potential to emit. (R 336.1205(3))

- 4. The permittee shall keep monthly records for FGFACILITY of VOC emission calculations determining the monthly emission rate in tons per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month, using the emission factors specified in Appendix A or an alternate method acceptable to the AQD District Supervisor. VOC emission calculations from fuel combustion shall use AP-42 emission factors or an alternate method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(3))
- 5. The permittee shall keep monthly records for FGFACILITY of individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month. The HAP emission factors specified in Appendix A shall be used, or alternate emission factors approved by the AQD District Supervisor. Individual and aggregate HAP emission calculations from fuel combustion shall use AP-42 emission factors or an alternate method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(3))

#### VII. REPORTING

NA

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## VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS

NA

 $\label{eq:potnotes:1} \hline \ ^1\text{This condition is state only enforceable and was established pursuant to Rule 201(1)(b).} \\$ 

# APPENDICES Appendix A: Emission Factors for FGFACILITY Emission Calculations

#### **VOC Emission Factors**

VOC emission factor, pounds per 1,000 pounds		
of textiles laundered		
Soiled shop towels Other textiles		
6.79	0.222	

### Hazardous Air Pollutant (HAP) Emission Factors

Pollutant	Emission factor, pound per 1,000 pounds of soiled shop towels laundered
Individual HAP *	0.49
Aggregate HAPs	1.24

\* This emission factor is for tetrachloroethylene, identified during the AQD review of PTI application No. 80-18 as the individual HAP with the greatest emission factor for soiled shop towel laundering.