



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Cintas Corporation No. 3  
Cumberland County  
Westbrook, Maine  
A-999-71-C-A (SM)**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #1**

**FINDINGS OF FACT**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

1. Cintas Corporation No. 3 (Cintas) was issued Air Emission License A-999-71-B-N/A on October 1, 2014 permitting the operation of emission sources associated with their industrial laundry facility.
2. Cintas has requested an amendment to their license to add two new washers and one new dryer to expand the facility's laundering capacity.
3. The equipment addressed in this license is located at 88 Spiller Drive, Westbrook, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

**Process Equipment**

<u>Equipment</u>	<u>Maximum Capacity</u> (MMBtu/hr)	<u>Maximum Firing Rate</u> (scf/hr)	<u>Fuel Type</u> <u>% Sulfur</u>	<u>Stack #</u>
Dryer 6	1.4	1,360	Natural Gas, Neg.	6

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

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106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
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PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the “Significant Emission” levels as defined in the Department’s *Definitions Regulation*, 06-096 CMR 100 (as amended). The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>	<u>Significant Emission Levels</u>
PM	3.8	4.1	0.3	100
PM <sub>10</sub>	3.8	4.1	0.3	100
SO <sub>2</sub>	0.08	0.1	0.02	100
NO <sub>x</sub>	7.5	8.1	0.6	100
CO	6.2	6.7	0.5	100
VOC	10.4	10.4	0.0	50
CO <sub>2e</sub>	<100,000	<100,000	<100,000	100,000

This modification is determined to be a minor modification and has been processed as such.

II. **BEST PRACTICAL TREATMENT (BPT)**

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Dryer 6

Cintas proposed to add a 1.4 MMBtu per hour, natural gas-fired dryer (Dryer 6), which vents to Stack #6.

BACT for Dryer 6 shall be firing of natural gas as fuel, and operation and maintenance of the dryer in accordance with the manufacturer's recommendations.

1. BACT Findings

The BACT emission limits for Dryer 6 were based on the following:

- PM/PM<sub>10</sub> – 0.05 lb/MMBtu based on 06-096 CMR 115, BPT
- SO<sub>2</sub> – 0.6 lb/MMscf based on AP-42, Table 1.4-2, dated 7/98
- NO<sub>x</sub> – 100 lb/MMscf based on AP-42, Table 1.4-1, dated 7/98
- CO – 84 lb/MMscf based on AP-42, Table 1.4-1, dated 7/98
- VOC – 5.5 lb/MMscf based on AP-42, Table 1.4-2, dated 7/98
- Opacity – 06-096 CMR 101 or previous BACT

The BACT emission limits for Dryer 6 are the following:

<u>Unit</u>	<u>PM</u> (lb/hr)	<u>PM<sub>10</sub></u> (lb/hr)	<u>SO<sub>2</sub></u> (lb/hr)	<u>NO<sub>x</sub></u> (lb/hr)	<u>CO</u> (lb/hr)	<u>VOC</u> (lb/hr)
Dryer 6	0.07	0.07	0.01	0.14	0.11	0.01

Visible emissions from Dryer 6 shall not exceed 10% opacity on a six (6)-minute block average, except for no more than one (1), six (6)-minute block average in a three (3)-hour period.

C. Annual Emissions

1. Total Annual Emissions

Cintas shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on 8760 hours per year of operation, firing natural gas, and laundering of a maximum of 2,911,765 shop towels.

**Total Licensed Annual Emissions for the Facility**  
**Tons per year**  
(used to calculate the annual license fee)

	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>	<u>HAP</u>
Previously licensed equipment	3.8	3.8	0.08	7.5	6.2	10.4	1.7
Dryer 6	0.3	0.3	0.02	0.6	0.5	0.03	-
<b>Total TPY</b>	<b>4.1</b>	<b>4.1</b>	<b>0.1</b>	<b>8.1</b>	<b>6.7</b>	<b>10.4</b>	<b>1.7</b>

**ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-999-71-C-A subject to the conditions found in Air Emission License A-999-71-B-N/R, and in the following conditions:

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

**THE FOLLOWING SPECIFIC CONDITION (20) SHALL BE ADDED TO AIR EMISSION LICENSE A-999-71-C-A:**

**(20) Dryer 6**

- A. Cintas is licensed to install and operate Dryer 6.
- B. Fuel

Dryer 6 shall fire natural gas. [06-096 CMR 115, BACT]

C. Emissions shall not exceed the following [06-096 CMR 115, BACT]:

<u>Emission Unit</u>	<u>PM</u> (lb/hr)	<u>PM<sub>10</sub></u> (lb/hr)	<u>SO<sub>2</sub></u> (lb/hr)	<u>NO<sub>x</sub></u> (lb/hr)	<u>CO</u> (lb/hr)	<u>VOC</u> (lb/hr)
Dryer 6	0.07	0.07	0.01	0.14	0.11	0.01

D. Visible Emissions

Visible emissions from Dryer 6 shall not exceed 10% opacity on a six (6)-minute block average, except for no more than one (1), six (6)-minute block average in a three (3)-hour period. [06-096 CMR 101, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 24 DAY OF March, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Come for  
PATRICIA W. AHO, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-999-71-B-N/A.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 01/23/2015

Date of application acceptance: 01/27/2015

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, PE, Bureau of Air Quality.

