



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

**Cintas Corporation No.3
Cumberland County
Westbrook, Maine
A-999-71-D-R/M**

**Departmental
Findings of Fact and Order
Air Emission License
Renewal and Amendment**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Cintas Corporation No.3 (Cintas) has applied to renew their Air Emission License for the operation of emission sources associated with their commercial laundry facility. Additionally, the maximum heat input capacity for the Boiler will be corrected to reflect the unit's actual firing rate.

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:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler	8.4	8,235	Natural gas	2006	2007	1

Cintas also has several small boilers, water heaters, and unit heaters not listed in the table above. These are considered insignificant emissions units because they are each rated below 1.0 MMBtu/hr, the heat input capacity level at or above which would require their inclusion in the license; therefore, these small boilers, water heaters, and unit heaters are not addressed further in this license.

Process Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Material Process Rate (Dried lb/hr)	Fuel Type	Stack #
Dryer 1	1.4	1,360	900	Natural Gas	2
Dryer 2	1.4	1,360	900	Natural Gas	3
Dryer 3	1.4	1,360	900	Natural Gas	4
Dryer 4	1.4	1,360	900	Natural Gas	5
Dryer 6	1.4	1,360	900	Natural Gas	6
Steam Tunnel	1.5	1,471	N/A	Natural Gas	Steam Tunnel

C. Definitions

Shop towel means a piece of cotton fabric or other material that is used to clean equipment, parts, objects, or surfaces of general soil, grease, or oil. Small amounts of solvents containing volatile organic compounds may be present on a shop towel, but these solvents must not have low flash points.

Print towel means 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.

Furniture towel means 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.

Records or Logs mean either hardcopy or electronic records.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

Cintas has applied to renew currently licensed emission units as well as modify their license as addressed in Section I(A) above.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the “Significant Emissions” levels as defined in the Department’s *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.)

ch. 100. This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

E. Facility Classification

With the annual shop towel processing limit, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Cintas is subject to license restrictions that keep facility emissions below major source thresholds for VOC; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Fuel Burning Equipment

Cintas operates the Boiler for steam. The corrected boiler heat input capacity is 8.4 MMBtu/hr and firing natural gas. The boiler was installed in 2007 and exhausts through its own stack, Stack #1.

Dryers #1, #2, #3, #4, and #6 are used to dry the laundered material, and each is rated at 1.4 MMBtu/hr firing natural gas. Each unit exhausts through its own stack.

The Steam Tunnel exposes garments to steam and is used as a final step in the laundering process. It has a 1.5 MMBtu/hr burner firing natural gas and exhausts through its own stack.

1. BPT Findings

The BPT emission limits for the Boiler, Dryers #1, #2, #3, #4, #6, and the Steam Tunnel were based on the following:

PM/PM₁₀/PM_{2.5} – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO₂ – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
NO_x – 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
Visible – 06-096 C.M.R. ch. 115, BPT
Emissions

The BPT emission limits for the Boiler, Dryers #1, #2, #3, #4, #6, and the Steam Tunnel are the following:

Unit	Pollutant	lb/MMBtu
Boiler	PM	0.05

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler	0.42	0.42	0.42	0.00	0.82	0.69	0.05
Dryer 1	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer 2	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer 3	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer 4	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer 6	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Steam Tunnel	0.08	0.08	0.08	0.00	0.15	0.12	0.01

2. Visible Emissions

Visible emissions from the Boiler, Dryers #1, #2, #3, #4, #6, and the Steam Tunnel shall each not exceed 10% opacity on a six-minute block average basis.

The Department has determined that the BPT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limits for the Boiler, Dryers #1, #2, #3, #4, #6, and the Steam Tunnel have been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the Order of this air emission license.

3. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to their size, the Boiler and Steam Tunnel are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after

June 9, 1989. Dryers #1, #2, #3, #4, #6 are similarly not subject to Subpart Dc because they are not steam generating units. [40 C.F.R. § 60.40c]

4. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ

The Boiler and the Steam Tunnel are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ as the units are gas-fired. Dryers #1, #2, #3, #4, and #6 are not subject to Subpart JJJJJ because they are not considered boilers. [40 C.F.R. § 63.11195]

C. Consent Agreement and Final Order

In May 2014, a Consent Agreement and Final Order (CAFO) was signed between the U.S. Environmental Protection Agency (USEPA) and Cintas. The CAFO addressed the laundering of towels which had the potential to emit substantial emissions of VOC. The following requirements from the CAFO are included in this air emission license.

1. Prohibition on Laundering Print and Furniture Towels

- a. Cintas may launder shop towels but shall not launder print or furniture towels (as defined in this air emission license).
- b. Shop towels from customers that also use print towels or furniture towels may be laundered if such shop towels contain no more than small amounts of solvents and these solvents do not have low flash points.

2. VOC Emission Cap

Emissions of VOC from all sources on-site must be limited to 9.9 tpy (12-month rolling total).

3. Shop Towel Throughput Limit

Cintas' throughput shall be limited to the processing of 2,910,000 pounds of soiled shop towels per year on a 12-month rolling total basis. This throughput limit is based on an emission factor of 6.8 lb VOC per 1,000 pounds of soiled shop towels.

4. Print and Furniture Towel Handling Procedures

Any print towels or furniture towels that are received at the facility shall be stored in closed containers or bags in a covered area outside the building and transported off-site for handling in accordance with applicable environmental laws.

5. Pre-Laundering Procedures for Shop Towels

- a. Soiled shop towels received at Cintas shall be kept in sealed bags or covered containers until the towels are sorted for washing.
- b. Soiled shop towels received during a day generally shall be laundered that same day or night. Soiled shop towels that are not laundered on the day or night of receipt shall be stored in closed containers or bags in a covered area outside of the laundry building.
- c. Any shop towels containing or saturated with free liquid that are received at the facility shall be stored in closed containers or bags in a covered area outside the laundry building and transported off-site for handling in accordance with applicable environmental laws.

6. Shop Towel Washing

- a. Cintas shall limit soiled shop towel load sizes on a 12-month rolling average to no more than 1.25 times the manufacturer's rated clean-towel capacity of the washers.

For example: Cintas must limit shop towel load size to 750 pounds on a 12-month rolling average for a washer with a manufacturer's rated capacity of 600 pounds.

- b. Cintas shall limit the ratio of soiled shop towel load size to manufacturer's rated washer capacity to no more than 1.75 to 1 for any single load.

For example: Cintas must limit the maximum shop towel load size in any one load to 1,050 pounds for any washer with a manufacturer's rated capacity of 600 pounds.

7. Wastewater

Cintas shall keep wastewater trenches, settling pits, and equalization tanks covered at all times other than during maintenance operations. This provision does not apply to plumbing vents installed on such trenches, pits, and tanks.

8. Training

- a. Cintas shall provide training for all employees who handle soiled shop towels or who are otherwise responsible for shop towel laundering, regarding proper procedures for transporting, receiving, storing, processing, washing, and drying shop towels.
- b. Cintas shall develop written training materials describing these procedures for covered plant staff and managers. The materials shall also contain specific

instructions for handling any print, furniture, or non-compliant shop towels that are received at the facility.

9. Recordkeeping

Cintas shall maintain copies of the following records on-site and have them available for inspection upon request of the Department or EPA:

- a. Definitions of shop, print, and furniture towels, and written procedures for Cintas employees and managers who handle or are otherwise responsible for towel laundering to ensure that Cintas does not launder print/furniture towels or shop towels containing free liquids.
- b. Training materials regarding shop towel handling procedures, and records demonstrating that all current employees who handle shop towels or who are otherwise responsible for towel laundering have been trained on proper handling procedures.
- c. The wash formula for shop towels.
- d. Soiled shop towel throughput records, including washer load size records.

D. Dryer PM Emissions

In previous licenses for the facility, particulate emissions from the drying of textiles were not addressed. As new information has become available from a stack test of a similar facility, the emissions of particulate matter can be quantified and addressed in this air emission license renewal.

Cintas conducted stack testing for Filterable PM, PM₁₀, and PM_{2.5} at their Grand Rapids MI facility in 2017. The test was conducted with Bar Towels, Shop Towels, Dust Mops, and Floor Mats as the laundered materials. The facility in Grand Rapids has similar dryers as well as particulate dryer lint filters on the vents through which the units exhaust to atmosphere. Testing results showed that the highest emissions of PM, PM₁₀, and PM_{2.5} were when the facility was drying Shop Towels with Bar Towels being the next highest. Tested emission rates are shown in the Table below:

Pollutant		Emission Rate	Unit
PM	Shop Towels	1.56×10^{-3}	Lb of emissions per lb of clean, dry textile
	Bar Towels	1.29×10^{-3}	
PM ₁₀	Shop Towels	1.05×10^{-3}	
	Bar Towels	2.12×10^{-4}	
PM _{2.5}	Shop Towels	9.41×10^{-4}	
	Bar Towels	1.36×10^{-4}	

This facility has a maximum capacity of 27,594,000 lb/year of dry laundered textiles with the 450 lb/hr capacity of the seven washing machines being the limiting factor. With the emissions factors above and the material processing limits detailed in the CAFO, Dryers #1, #2, #3, #4, and #6 shall be limited to the following emission limits from the drying of laundered textiles.

Unit	Dried Material	PM (lb/hr)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)
Dryer 1	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer 2	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer 3	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer 4	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer 6	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12

In addition to the limits above, Cintas shall operate and maintain lint traps on the exhausts of all dryers at the facility.

E. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

F. Fugitive Emissions

Cintas shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

Cintas shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

G. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant

activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on the following assumptions:

- A VOC limit of 9.9 tpy from the cleaning of Shop Towels;
- Operating the dryers for 8,760 hr/yr each using the worst-case emission factors; and
- Operating the fuel burning equipment for 8,760 hr/yr each.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	CO	VOC
Boiler	1.8	1.8	1.8	0.0	3.6	3.0	0.2
Dryers	1.5	1.5	1.5	0.0	3.0	2.5	0.2
Steam Tunnel	0.3	0.3	0.3	0.0	0.6	0.5	-
Shop Towel Laundry	-	-	-	-	-	-	9.9
Dryer Lint	18.1	3.9	2.8	-	-	-	-
Total TPY	21.8	7.6	6.5	0.0	7.2	6.1	10.3

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by-case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
PM _{2.5}	15
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Cintas to submit additional information and may require an ambient air quality impact analysis at that time.

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-D-R/M subject to the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof 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.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115.
[06-096 C.M.R. ch. 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension

upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 115]

- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115] Payment of the annual air emission license fee for Cintas is due by the end of February of each year.
[38 M.R.S. § 353-A(3)]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege.
[06-096 C.M.R. ch. 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.
[06-096 C.M.R. ch. 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.
[06-096 C.M.R. ch. 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
[06-096 C.M.R. ch. 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
 - A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff

inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
or

2. Pursuant to any other requirement of this license to perform stack testing.
 - B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. Submit a written report to the Department within thirty (30) days from date of test completion.
[06-096 C.M.R. ch. 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. Within thirty (30) days following receipt of the written test report by the Department, or another alternative timeframe approved by the Department, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and
 - B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
[06-096 C.M.R. ch. 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or license requirement. [06-096 C.M.R. ch. 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next

state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]

- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 115]
- (16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(17) **Fuel Burning Equipment**

- A. The Boiler, Dryers #1, #2, #3, #4, and #6, and the Steam Tunnel are licensed to fire natural gas. [06-096 C.M.R. ch. 115, BPT]
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler	PM	0.05	06-096 C.M.R. ch. 115, BPT

- C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	PM_{2.5} (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler	0.42	0.42	0.42	0.00	0.82	0.69	0.05
Dryer #1	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer #2	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer #3	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer #4	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Dryer #6	0.07	0.07	0.07	0.00	0.14	0.11	0.01
Steam Tunnel	0.08	0.08	0.08	0.00	0.15	0.12	0.01

- D. Visible emissions from the Boiler, Dryers #1, #2, #3, #4, and #6, and the Steam Tunnel shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(18) Consent and Final Order [06-096 C.M.R. ch. 115, BPT]

A. Prohibition on Laundering Print and Furniture Towels

1. Cintas may launder shop towels but shall not launder print or furniture towels, as defined in this air emission license.
2. Shop towels from customers that also use print towels or furniture towels may be laundered if such shop towels contain no more than small amounts of solvents and these solvents do not have low flash points.

B. VOC Emission Cap

Emissions of VOC from all licensed sources on-site must be limited to 9.9 tpy on a 12-month rolling total basis.

C. Shop Towel Throughput Limit

Cintas' throughput shall be limited to the processing of 2,910,000 pounds of soiled shop towels per year on a 12-month rolling total basis.

D. Print and Furniture Towel Handling Procedures

Any print towels or furniture towels that are received at the facility shall be stored in closed containers or bags in a covered area outside the building and transported off-site for handling in accordance with applicable environmental laws.

E. Pre-Laundering Procedures for Shop Towels

1. Soiled shop towels received at Cintas shall be kept in sealed bags or covered containers until the towels are sorted for washing.
2. Soiled shop towels received during a day generally shall be laundered that same day or night. Soiled shop towels that are not laundered on the day or night of receipt shall be stored in closed containers or bags in a covered area outside of the laundry building.
3. Any shop towels containing or saturated with free liquid that are received at the facility shall be stored in closed containers or bags in a covered area outside the laundry building and transported off-site for handling in accordance with applicable environmental laws.

F. Shop Towel Washing

1. Cintas shall limit soiled shop towel load sizes on a 12-month rolling average to no more than 1.25 times the manufacturer's rated clean-towel capacity of the washers.
2. Cintas shall limit the ratio of soiled shop towel load size to manufacturer's rated washer capacity to no more than 1.75-to-1 for any single load.

G. Wastewater

Cintas shall keep wastewater trenches, settling pits, and equalization tanks covered at all times other than during maintenance operations. This provision does not apply to plumbing vents installed on such trenches, pits, and tanks.

H. Training

1. Cintas shall provide training for all employees who handle soiled shop towels, or who are otherwise responsible for shop towel laundering, regarding proper procedures for transporting, receiving, storing, processing, washing, and drying shop towels.
2. Cintas shall develop written training materials describing these procedures for covered plant staff and managers. The materials shall also contain specific instructions for handling any print, furniture, or non-compliant shop towels that are received at the facility.

I. Recordkeeping

Cintas shall maintain copies of the following records on-site and have them available for inspection upon request of the Department or EPA:

1. Definitions of shop, print, and furniture towels, and written procedures for Cintas employees and managers who handle or are otherwise responsible for towel laundering to ensure that Cintas does not launder print/furniture towels or shop towels containing free liquids.
2. Training materials regarding shop towel handling procedures, and records demonstrating that all current employees who handle shop towels, or who are otherwise responsible for towel laundering, have been trained on proper handling procedures.
3. The wash formula for shop towels.
4. Soiled shop towel throughput records, including washer load size records.

(19) **Dryer PM Emissions**

A. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	Dried Material	PM (lb/hr)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)
Dryer #1	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer #2	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer #3	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer #4	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12
Dryer #6	Shop Towels	1.40	0.95	0.85
	All Other Textiles	1.16	0.19	0.12

B. Cintas shall operate and maintain lint traps on the exhausts of all dryers at the facility.
[06-096 C.M.R. ch. 115, BPT]

(20) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(21) **Fugitive Emissions**

A. Cintas shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

B. Cintas shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

[06-096 C.M.R. ch. 101, § 4(C)]

- (22) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Cintas may be required to submit additional information. Upon written request from the Department, Cintas shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.
[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 16th DAY OF DECEMBER, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/1/24

Date of application acceptance: 10/1/24

This Order prepared by Chris Ham, Bureau of Air Quality.