STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

Governor Brad Little
Director John H. Tippets

March 13, 2020

Micah Crist, General Manager
Cintas Corporation
27 Whitney Drive
Milford, OH 45150

RE: Facility ID No. 027-00178, Cintas Corporation, Nampa
Final Permit Letter

Dear Mr. Crist:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0025 Project 62239 to Cintas Corporation located in Nampa for the industrial laundering facility. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received on May 23, 2019, and supplemental information provided on December 6, 2019.

This permit is effective immediately. This permit does not release Cintas Corporation from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard St. Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with David Luft, Air Quality Manager, at (208) 373-0201 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Zach Pierce at (208) 373-0502 or zach.pierce@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\zp
Permit No. P-2019.0025 PROJ 62239
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Cintas Corporation
Permit Number	P-2019.0025
Project ID	62239
Facility ID	027-00178
Facility Location	2302 E. Railroad St. Nampa, ID 83687

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued March 13, 2020

Zach Pierce, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is an initial permit to construct (PTC) for an existing facility that processes laundry through washers and dryers.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source		Control Equipment
2	Emissions Unit Name:	**Wash Alley**	None
	Washers 1-3:		
	Max. SST:	1000 lb/load	
	Cycle Time:	1.5 hr	
	Pony Washer 1:		
	Max. SST:	175 lb/load	
	Cycle Time:	1.5 hr	
	Emissions Unit Name:	**Wastewater Treatment Room**	
2, 3, 4	Emissions Unit Name:	**Dryer #1**	
	Manufacturer:	CLM	
	Model:	600GP	
	Manufacture Date:	Oct., 2000	
	Heat input rating:	1.6 MMBtu/hr	
	Max. SST:	750 lb/load	
	Cycle Time:	0.75 hr	
	Emissions Unit Name:	**Dryer #2**	
	Manufacturer:	CLM	
	Model:	800GP	
	Manufacture Date:	Oct., 2000	
	Heat input rating:	2.0 MMBtu/hr	
	Max. SST:	1000 lb/load	
	Cycle Time:	0.75 hr	
	Emissions Unit Name:	**Pony Dryer**	
	Manufacturer:	Cissel	
	Model:	KD175G	
	Manufacture Date:	Nov., 2000	
	Heat input rating:	0.45 MMBtu/hr	
	Max. SST:	219 lb/load	
	Cycle Time:	0.75 hr	
4	Emissions Unit Name:	**Steam Tunnel**	
	Manufacturer:	Leonard Automatics	
	Model:	VISION G24	
	Manufacture Date:	1995	
	Heat input rating:	0.8 MMBtu/hr	
	Fuel:	Natural Gas	
	Emissions Unit Name:	**HVAC #1-6**	
	Heat input ratings:	0.2 MMBtu/hr	
	Fuel:	Natural Gas	
	Emissions Unit Name:	**HVAC #7, 8**	
	Heat input ratings:	0.15 MMBtu/hr	
	Fuel:	Natural Gas	

Permit Section	Source		Control Equipment
4	Emissions Unit Name:	**Boiler #1**	None
	Manufacturer:	Sellers	
	Model:	125HP-SH-LN390	
	Manufacture Date:	1996	
	Heat input rating:	5.23 MMBtu/hr	
	Fuel:	Natural Gas	
	Emissions Unit Name:	**Water Heater**	
	Manufacturer:	Kemco	
	Model:	ORDER #19141	
	Manufacture Date:	1995	
	Heat input rating:	3.00 MMBtu/hr	
	Fuel:	Natural Gas	

2 Shop Towel Laundering

2.1 Process Description

The laundry brought to this facility is run through a wash cycle with detergent and water. This process specifically emits Volatile Organic Compounds (VOCs) as proved by source testing. The emissions from this washing cycle are subject to the weight of shop towels processed because emissions from the other textiles are considered negligible. The throughput of Soiled Shop Towels is the weight of the dirty shop towels to enter the shop towel laundering process.

Table 2.1 Shop Towel Laundering Description

Emissions Units / Processes	Emission Points
Wash Alley Washer 1-3: Max. SST: 1000 lb/load Cycle Time: 1.5 hr Pony Washer 1[a]: Max. SST: 175 lb/load Cycle Time: 1.5 hr	
Wastewater Treatment Room	
Dryers Dryer #1 Manufacturer: CLM Model: 600GP Manufacture Date: Oct., 2000 Heat input rating: 1.6 MMBtu/hr Max. SST: 750 lb/load Cycle Time: 0.75 hr Dryer #2 Manufacturer: CLM Model: 800GP Manufacture Date: Oct., 2000 Heat input rating: 2.0 MMBtu/hr Max. SST: 1000 lb/load Cycle Time: 0.75 hr Pony Dryer[a] Manufacturer: Cissel Model: KD175G Manufacture Date: Nov., 2000 Heat input rating: 0.45 MMBtu/hr Max. SST: 219 lb/load Cycle Time: 0.75 hr	Exit height: 29.58 ft (9.017 m) Exit diameter: 0.003 ft (0.001 m) Exit temperature: 140 °F (60 °C) Exit height: 30.66 ft (9.347 m) Exit diameter: 0.003 ft (0.001 m) Exit temperature: 140 °F (60 °C)

a) Pony Washer and Pony Dryer do not launder shop towels; therefore, their emissions from shop towel laundering are negligible.

Emission Limits

2.2 Opacity Limit

Emissions from Shop Towel Laundering stack, or any other stack, vent, or functionally equivalent opening associated with Shop Towel Laundering, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.3 Soiled Shop Towel Laundering Process Throughput Limits

The Soiled Shop Towel Laundering throughput shall not exceed 545,000 pounds (lbs) of Soiled Shop Towels per any consecutive 12-month period.

2.4 Shop Towel Requirement

The permittee shall process Soiled Shop Towels separately from other textile goods.

2.5 Print/Furniture Towels Requirement

The permittee shall not process any print or furniture towels.

2.6 Pony Washer and Pony Dryer Requirement

Shop Towels shall not be processed in the pony washer or the pony dryer.

2.7 Free Liquid Requirement

The permittee shall not process any towels containing free liquids.

2.8 Flash Point Requirement

The permittee shall not process shop towels that contain materials with flash points lower than 140°F.

Monitoring and Recordkeeping Requirements

2.9 Soiled Shop Towel Laundering Process Throughput Limits Monitoring

Each calendar month, the permittee shall monitor and record the throughput of Soiled Shop Towels for the previous month in pounds per month (lbs/mo). Soiled Shop Towel throughput shall be determined by summing the monthly throughput over the previous consecutive 12-month period to demonstrate compliance with the Soiled Shop Towel Laundering Process Throughput Limits.

2.10 Soiled Shop Towel Laundering Data Sheets

The permittee must require customers to provide safety data sheets (SDS) for review prior to accepting shop towel products. The permittee must keep SDS records for all the shop towels products processed through the facility.

2.11 Recordkeeping

Records shall be kept according to the Monitoring and Recordkeeping General Provision. Supporting information includes, but is not limited to, steel SDS sheets, receipts, and inventory logs.

3 Drying

3.1 Process Description

After the wash cycle, wet textiles are transferred to one of the dryers. Each dryer has an exhaust vent from its own stack on the roof. The dried laundry is transferred from the dryers into a cart, where it is taken for pressing, sorting and final processing. This process focuses on the emissions of particulates. The throughput of the dryers is measured by weight of Clean Dry Textiles, which is the weight of the textiles after the drying cycle is complete. The conversion factor to go from Soiled Shop Towels to Clean Dry Textiles is 1.25 lbs SST/lb CDT and was determined from source testing.

There is the potential for particulate or lint to be released during the drying of textile products, including shop towels. Lint is composed of tiny bits of fabric fibers that are shed from the edges of garments and other textiles. During the drying stage, the removal of water and the increased fabric friction result in lint being released. The lint is collected on a lint filter prior to being exhausted from the stack. The lint filters are cleaned frequently to prevent reduced airflow resulting from lint buildup because lint buildup on the filter can cause the dryer to operate at elevated temperatures and overheat, thus creating a fire hazard.

Table 3.1 Drying Description

Emissions Units / Processes		Emission Points	
Dryer #1			
Manufacturer:	CLM	Exit height:	29.58 ft (9.017 m)
Model:	600GP	Exit diameter:	0.003 ft (0.001 m)
Manufacture Date:	Oct., 2000	Exit temperature:	140 °F (60 °C)
Heat input rating:	1.6 MMBtu/hr		
Max. SST:	750 lb/load		
Cycle Time:	0.75 hr		
Dryer #2			
Manufacturer:	CLM	Exit height:	30.66 ft (9.347 m)
Model:	800GP	Exit diameter:	0.003 ft (0.001 m)
Manufacture Date:	Oct., 2000	Exit temperature:	140 °F (60 °C)
Heat input rating:	2.0 MMBtu/hr		
Max. SST:	1000 lb/load		
Cycle Time:	0.75 hr		
Pony Dryer			
Manufacturer:	Cissel		
Model:	KD175G		
Manufacture Date:	Nov., 2000		
Heat input rating:	0.45 MMBtu/hr		
Max. SST:	219 lb/load		
Cycle Time:	0.75 hr		

Emission Limits

3.2 Opacity Limit

Emissions from the Dryer stack, or any other stack, vent, or functionally equivalent opening associated with the Dryers, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.3 Drying Process Throughput Limits

Drying total throughput shall not exceed 10,500,000 lbs of Clean Dry Textiles per any consecutive 12-month period and shall not exceed 10,064,000 lbs of Non-Shop Towel Clean Dry Textiles per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

3.4 Drying Process Throughput Limits Monitoring

Each calendar month, the permittee shall monitor and record the textile throughput, both total textiles and Non- Shop Towel textiles, in the Drying process for the previous month in lbs/mo. Textile throughput shall be determined by summing the monthly throughput over the previous consecutive 12-month period to demonstrate compliance with the Drying Process Throughput Limits permit condition.

3.5 Recordkeeping

Records shall be kept according to the Monitoring and Recordkeeping General Provision. Supporting information includes, but is not limited to, steel SDS sheets, receipts, and inventory logs.

4 Boilers, Heaters, Dryers

4.1 Process Description

This facility operates various combustion equipment to help wash, dry, and steam the textiles along with having to heat the facility.

Table 4.1 Combustion Description

Emissions Units / Processes	Emission Points
Emissions Unit Name: Dryer #1 Manufacturer: CLM Model: 600GP Manufacture Date: Oct., 2000 Heat input rating: 1.6 MMBtu/hr Max. production: 600 lb/load	Exit height: 29.58 ft (9.017 m) Exit diameter: 0.003 ft (0.001 m) Exit temperature: 140 °F (60 °C)
Emissions Unit Name: Dryer #2 Manufacturer: CLM Model: 800GP Manufacture Date: Oct., 2000 Heat input rating: 2.0 MMBtu/hr Max. production: 800 lb/load	Exit height: 30.66 ft (9.347 m) Exit diameter: 0.003 ft (0.001 m) Exit temperature: 140 °F (60 °C)
Emissions Unit Name: Pony Dryer Manufacturer: Cissel Model: KD175G Manufacture Date: Nov., 2000 Heat input rating: 0.45 MMBtu/hr Max. production: 175 lb/load	
Emissions Unit Name: Boiler #1 Manufacturer: Sellers Model: 125HP-SH-LN390 Manufacture Date: 1996 Heat input rating: 5.23 MMBtu/hr Fuel: Natural Gas	Exit height: 38 ft (11.58 m) Exit diameter: 1.33 ft (0.405 m)
Emissions Unit Name: Water Heater Manufacturer: Kemco Model: ORDER #19141 Manufacture Date: 1995 Heat input rating: 3.00 MMBtu/hr Fuel: Natural Gas	Exit height: 33 ft (10.05 m) Exit diameter: 1.33 ft (0.405 m)
Emissions Unit Name: Steam Tunnel Manufacturer: Leonard Automatics Model: VISION G24 Manufacture Date: 1995 Heat input rating: 0.80 MMBtu/hr Fuel: Natural Gas	Exit height: 35.5 ft (10.82 m) Exit diameter: 1.33 ft (0.405 m)
Emissions Unit Name: HVAC #1-6 Heat input ratings: 0.2 MMBtu/hr Fuel: Natural Gas	
Emissions Unit Name: HVAC #7, 8 Heat input ratings: 0.15 MMBtu/hr Fuel: Natural Gas	

Emission Limits

4.2 Opacity Limit

Emissions from the Combustion stack, or any other stack, vent, or functionally equivalent opening associated with the Combustion, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

4.3 Fuel Burning Equipment - Particulate Matter - 58.01.01.675

In accordance with IDAPA 58.01.01.676, the permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 grains per dry standard cubic feet (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

Operating Requirements

4.4 Allowable Fuel Types

The combustion units shall only combust natural gas as fuel.

4.5 Natural Gas Usage Limits

Natural Gas usage shall not exceed 20 million standard cubic feet (MMSCF) per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

4.6 Natural Gas Usage Limits Monitoring

Each calendar month, the permittee shall monitor and record the usage of Natural Gas for the previous month in standard cubic feet per month (scf/mo). Combustion usage shall be determined by summing the monthly usage over the previous consecutive 12-month period to demonstrate compliance with the Natural Gas Usage Limits permit condition.

4.7 Recordkeeping

Records shall be kept according to the Monitoring and Recordkeeping General Provision. Supporting information includes, but is not limited to, steel SDS sheets, receipts, and inventory logs.

5 General Provisions

General Compliance

5.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

5.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

5.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

5.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

5.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

5.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

5.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

5.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

5.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

5.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

5.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

5.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

5.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

5.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

5.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]