



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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UniFirst Corporation
Penobscot County
Bangor, Maine
A-644-71-E-R/A

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

After review of the air emissions license renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

The UniFirst Corporation has applied to renew their Air Emission License permitting the operation of emission sources associated with their industrial laundry facility.

The UniFirst Corporation has requested an amendment to their license in order to include the addition of a parts washer and two natural gas-fired dryers, and the conversion of the facilities' boilers to dual-fueled units. Natural gas is the primary fuel source, while #2 fuel oil will now only be used as an emergency backup fuel source for the boilers.

The equipment addressed in this license is located at 70 Godsoe Road, Bangor, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Mfg. Date</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler #1	8.4	137 cfm	Natural gas	1979	2011	1
		60 gal/hr	#2 Fuel oil, 0.5%		1979	
Boiler #2	8.4	137 cfm	Natural gas	1979	2011	2
		60 gal/hr	#2 Fuel oil, 0.5%		1979	

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

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Boilers #1 and #2 are dual-fuel fired units. Natural gas is the primary fuel source and #2 fuel oil is used only for emergency backup.

UniFirst Corporation has additional insignificant fuel-burning activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Chapter 115 license application and in Appendix B of *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

Dryers

<u>Equipment</u>	<u>Max. Raw Material Process Rate</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (cfm)</u>	<u>Fuel Type</u>	<u>Mfg. Date</u>	<u>Install. Date</u>	<u>Stack #</u>
Dryer #1	900 lbs/cycle	3.00	49	Natural gas	2011	2011	3
Dryer #2	900 lbs/cycle	3.00	49	Natural gas	2012	2012	4

This license also includes the operation of a parts washer, designated Parts Washer #1. Parts Washer #1 has a capacity of 15 gallons and uses a Safety-Kleen 105 solvent.

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 regulations. The emission increases are determined by subtracting the current licensed emissions preceding the modification from the maximum future licensed allowed emissions, as follows:

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>	<u>Sig. Level</u>
PM	1.3	5.0	3.7	100
PM ₁₀	1.3	5.0	3.7	100
SO ₂	5.3	5.3	0.0	100
NO _x	1.4	9.8	8.4	100
CO	0.4	8.3	7.9	100
VOC	0.1	0.5	0.4	50

This modification is determined to be a minor modification. Therefore, this license is determined to be a renewal and 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 as well as for those sources located in designated non-attainment areas.

BPT for new 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.

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. Boilers #1 and #2

UniFirst Corporation operates Boilers #1 and #2 primarily for facility hot water and heating needs. Boilers #1 and #2 each have a maximum design heat input capacity of 8.4 MMBtu/hr and are dual-firing units as of 2011. Initially, the boilers were manufactured and installed in 1979 to run #2 fuel oil. In 2011, the boilers were converted to fire both #2 fuel oil and natural gas. Boilers #1 and #2 use natural gas as the primary fuel source and #2 fuel oil as an emergency backup fuel source only. Boilers #1 and #2 each exhaust through Stacks #1 and #2 which are both 30.67 feet above ground and have an inside diameter of 1.29 feet.

Due to the size of Boilers #1 and #2, they are not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

1. BACT/ BPT Findings

The BACT/ BPT emission limits for the boilers were based on the following:

Natural Gas

- PM/PM₁₀ – Emissions are regulated by 06-096 CMR 103, *Fuel Burning Equipment Particulate Emission Standard*, however, the BACT determined PM emission limit of 0.05 lb/MMBtu when firing natural gas is more stringent [06-096 CMR 115, BACT]
- SO₂ – 0.6 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)
- NO_x – 100 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)
- CO – 84 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)
- VOC – 5.5 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)
- Opacity – Visible emissions from each of the boilers when firing natural gas shall not exceed an opacity of 10% on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

#2 Fuel Oil

- PM/PM₁₀ – 0.12 lb/MMBtu based on 06-096 CMR 103
- SO₂ – based on firing ASTM D396 compliant #2 fuel oil (0.5% sulfur); 0.5 lb/MMBtu
- NO_x – 24 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
- CO – 5 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
- VOC – 0.34 lb/1000 gal, AP-42, Table 1.3-3, dated 5/10
- Opacity – Visible emissions from each of the boilers when firing #2 fuel oil shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

The #2 fuel oil NO_x, CO and VOC emissions limits have been updated to the most recent AP-42 data available (dated 5/10). Previous licenses' emission limits had been based on data dated September 1998 [BPT (II)(B) of license renewal A-644-71-D-R].

The BPT emission limits for the boilers are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 (8.4 MMBtu/hr) <i>nat'l gas</i>	0.42	0.42	0.01	0.82	0.69	0.05
Boiler #1 (8.4 MMBtu/hr) <i>#2 fuel</i>	1.01	1.01	4.26	1.44	0.30	0.02
Boiler #2 (8.4 MMBtu/hr) <i>nat'l gas</i>	0.42	0.42	0.01	0.82	0.69	0.05
Boiler #2 (8.4 MMBtu/hr) <i>#2 fuel</i>	1.01	1.01	4.26	1.44	0.30	0.02

When firing #2 fuel oil, UniFirst Corporation shall be limited to 150,000 gallons/yr of #2 fuel oil with a maximum sulfur content of 0.5 % by weight on a calendar year basis.

Prior to January 1, 2016, the #2 fuel oil fired in Boilers #1 and #2 shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per 38 MRSA §603-A(2)(A)(3), beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm), and beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm).

2. Periodic Monitoring

Periodic monitoring for the boilers shall include recordkeeping to document fuel use both on a monthly and calendar year basis. Documentation shall include the fuel quantity and type.

3. 40 CFR Part 63 Subpart JJJJJ

Boilers #1 and #2 are operated as gas-fired boilers and therefore are not be subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). A gas-fired boiler is defined by this Subpart as follows:

any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [40 CFR § 63.11237]

UniFirst will only use liquid fuel (fuel oil) in the boilers during gas curtailment or gas supply emergencies. Any periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

C. Dryers #1 and #2

UniFirst Corporation now operates industrial laundry dryers, designated Dryer #1 and #2, that fire on natural gas. The dryers are each rated at 3.0 MMBtu/hr and are designed to process 900 pounds of laundry per cycle. Dryer #1 was manufactured and installed in 2011, and Dryer #2 in 2012. Dryer #1 will exhaust to Stack #3 and Dryer #2 will exhaust through Stack #4. Stacks #3 and #4 have heights above ground of 23.5 feet and 24.7 feet, respectively, and each have an inside diameter of 2 feet.

Dryers #1 and #2 each have a heat input capacity of less than 10 MMBtu/hr and are not steam generating units and are therefore not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. A steam generating unit is defined by this Subpart as follows:

a device that combusts any fuel and produces steam or heats water or heats any heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart. [40 CFR § 60.41c]

1. BACT Findings

The BACT emission limits for the dryers were based on the following:

- PM/PM₁₀ – Emissions are regulated by 06-096 CMR 103, *Fuel Burning Equipment Particulate Emission Standard*, however, the BACT determined PM emission limit of 0.05 lb/MMBtu when firing natural gas is more stringent [06-096 CMR 115, BACT]
- SO₂ – 0.6 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)
- NO_x – 100 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)
- CO – 84 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)
- VOC – 5.5 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)
- Opacity – Visible emissions from each dryer firing natural gas shall not exceed an opacity of 10% on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

The BACT emission limits for the dryers are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Dryers #1 (3.0 MMBtu/hr) <i>nat'l gas</i>	0.15	0.15	0.01	0.29	0.25	0.02
Dryers #2 (3.0 MMBtu/hr) <i>nat'l gas</i>	0.15	0.15	0.01	0.29	0.25	0.02

2. Periodic Monitoring

Periodic monitoring for the dryers shall include recordkeeping to document fuel use both on a monthly and calendar year basis. Documentation shall include the fuel quantity and type.

D. Parts Washer

Parts Washer #1 has a design capacity of 15 gallons. UniFirst Corporation uses Safety-Kleen 105 solvent. The parts washer is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended), and records shall be kept documenting compliance.

E. General Process Emissions

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

F. Annual Emissions

1. Total Annual Emissions

Because emissions are dependent on the fuel being fired, and UniFirst Corporation wishes to retain licensed capability to fire #2 fuel oil when natural gas is not available, the facility shall be restricted to the maximum annual emissions from the fuel which gives the highest tons per year quantity for each pollutant. The tons per year of pollutants from natural gas combustion were calculated based on maximum operation time in a year of 8,760 hours/yr. The tons per year limits of pollutants from #2 fuel oil combustion were calculated based on the previously licensed limit of 150,000 gallons/yr of #2 fuel oil fired in Boilers #1 and #2 with a sulfur content not to exceed 0.5% by weight [condition (16)(A) of license renewal A-644-71-D-R]. Due to these limitations, the highest emissions occur for PM, PM₁₀, NO_x, CO and VOC when firing natural gas in the boilers and SO₂ when firing number #2 fuel oil in the boilers.

The resulting annual emissions limits for the facility based on a calendar year are as follows:

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boilers #1 and #2	3.7	3.7	5.3	7.2	6.1	0.4
Dryers #1 and #2	1.3	1.3	0.02	2.6	2.2	0.1
Total TPY	5.0	5.0	5.3	9.8	8.3	0.5

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, UniFirst Corporation is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling is not required for a renewal if the total emissions of any pollutant released do not exceed the following and there are no extenuating circumstances:

<u>Pollutant</u>	<u>Tons/Year</u>
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on the total facility licensed emissions, UniFirst Corporation is below the emission levels required for modeling.

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-644-71-E-R/A subject to 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.

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.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 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 CMR 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 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]
 - (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 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 CMR 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 CMR 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 CMR 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 CMR 115]
 - (11) In accordance with the Department's air emission compliance test protocol and 40 CFR 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 CFR 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 CMR 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 such test results, 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 CFR 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 CMR 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 Part 70 license requirement. [06-096 CMR 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 emission 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 CMR 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 CMR 115]

SPECIFIC CONDITIONS

(16) Boilers #1 and #2

A. UniFirst Corporation is licensed to fire either #2 fuel oil or natural gas. Natural gas is the primary fuel source and #2 fuel oil shall be used only for emergency backup.

B. Fuel

1. Total fuel use for Boilers #1 and #2 when firing #2 fuel oil as an emergency backup shall not exceed 150,000 gal/yr of #2 fuel oil, based on a calendar year basis.
2. Prior to January 1, 2016, any #2 fuel oil fired in the boilers shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). [06-096 CMR 115, BPT]
3. Beginning January 1, 2016, the facility, when not using natural gas, shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018, the facility, when not using natural gas, shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]
5. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered (if applicable). Records of annual fuel use shall be kept on a monthly and calendar year basis. [06-096 CMR 115, BPT]

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

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
NG - Boiler #1, #2	PM	0.05	06-096 CMR 115, BACT
#2 Oil - Boiler #1, #2,	PM	0.12	06-096 CMR 115, BPT

D. Emissions from the boilers when firing natural gas shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.42	0.42	0.01	0.82	0.69	0.05
Boiler #2	0.42	0.42	0.01	0.82	0.69	0.05

E. Visible emissions from each boiler firing natural gas shall not exceed 10% opacity on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [06-096 CMR 101]

F. Emissions from the boilers when firing #2 fuel oil shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	1.01	1.01	4.26	1.44	0.30	0.02
Boiler #2	1.01	1.01	4.26	1.44	0.30	0.02

G. Visible emissions from the boilers when firing #2 fuel oil shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

(17) **Dryers #1 and #2**

A. UniFirst Corporation shall record the fuel quantity and type from the supplier records. Records of annual fuel use shall be kept on a monthly and calendar year basis. [06-096-CMR 115, BPT]

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

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Dryer #1, #2	PM	0.05	06-096 CMR 115, BACT

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Dryer #1	0.15	0.15	0.01	0.29	0.25	0.02
Dryer #2	0.15	0.15	0.01	0.29	0.25	0.02

D. Visible emissions from Stacks #3 and #4 shall not exceed 10% opacity on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

(18) **Parts Washer**

The parts washer at UniFirst Corporation is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

A. UniFirst Corporation shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]

- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 2. Wipe cleaning; and,
 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
1. UniFirst Corporation shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
 - (i) Waste solvent shall be collected and stored in closed containers.
 - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
 - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
 - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - (viii) Work area fans shall not blow across the opening of the degreaser unit.
 - (ix) The solvent level shall not exceed the fill line.
 2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(19) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

UniFirst Corporation
Penobscot County
Bangor, Maine
A-644-71-E-R/A

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

- (20) UniFirst Corporation 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.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 1st DAY OF October, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie L. Lyster
PATRICIA W. AHO, COMMISSIONER

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

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 07/13/2012

Date of application acceptance: 07/18/2012

Date filed with the Board of Environmental Protection:

This Order prepared by Allison M. Hazard, Bureau of Air Quality.



