



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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Commissioner

April 11, 2012

Mr. Cory Fye  
ARAMARK Uniform & Career  
Apparel, LLC  
110 Glen Street  
Lawrence, MA 01803

**RE: LAWRENCE**  
Transmittal No.: X241187  
Application No.: NE-12-005  
Class: *NM99*  
FMF No.: 53704  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Fye:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the existing operation of four (4) industrial laundry dryers at your textile rental services facility located at 110 Glen Street in Lawrence, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner / operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

**1. DESCRIPTION OF FACILITY AND APPLICATION**

The Permittee uses conventional industrial laundry equipment and methods including water washers and four (4) natural gas fired dryers to launder its customers' textile rental items. This Application is submitted to establish operational restrictions on drying shop towels and limit volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions from the four (4) existing industrial laundry dryers at the Facility. The Permittee filed certification for one, 14.7 million Btu per hour boiler pursuant to Regulation 310 CMR 7.26(30)(c) in 2002. The Permittee shall not launder towels with free solvent liquids or that are heavily soiled with solvents. VOC and HAP emissions associated with water washers are insignificant. The maximum emission factor of 1.578 pounds of VOC per 1000 pounds of soiled shop towels laundered (laundry weight before washing) is based on VOC compliance emission testing of dryers at similar facility at Sacramento, California from 2006 to 2011.

**2. EMISSION UNIT (EU) IDENTIFICATION**

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

<b>Table 1</b>			
<b>EU#</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU1	Challenge CPG43S3L Dryer	2,750,000 Btu/hr	None
EU2	Challenge CPG602022B Dryer	2,900,000 Btu/hr	None
EU3	Challenge CPG43S3L Dryer	2,750,000 Btu/hr	None
EU4	Challenge CPG602022B Dryer	2,900,000 Btu/hr	None

**Table 1 Key:**

EU# = Emission Unit Number  
 PCD = Pollution Control Device  
 Btu/hr = British thermal units per hour

**3. APPLICABLE REQUIREMENTS**

**A. OPERATIONAL, PRODUCTION AND EMISSION LIMITS**

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2, below:

<b>Table 2</b>			
<b>EU#</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
EU1 EU2 EU3 EU4	Maximum of six (6) loads of soiled shop towels per day, each load not to exceed 1260 pounds.	VOC	0.2 TPM and 2.2 TPY
		HAPs (total)	0.2 TPM and 2.2 TPY

**Table 2 Key:**

EU# = Emission Unit Number  
 VOC = Volatile Organic Compounds  
 HAPs (total) = total Hazardous Air Pollutants  
 TPM = tons per month  
 TPY = tons per consecutive 12-month period

**Note:** Calculation of VOC emissions will be sufficient to demonstrate compliance with the HAPs (total) emission limits.

**B. COMPLIANCE DEMONSTRATION**

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

<b>Table 3</b>	
<b>EU#</b>	<b>Monitoring and Testing Requirements</b>
EU1 EU2 EU3 EU4	1. The Permittee shall monitor pounds of soiled shop towels laundered* each month and per consecutive 12-month period to determine compliance status with VOC and HAPs (total) emission limits in Table 2, using an emission factor of 1.578 pounds of VOC per 1000 pounds of soiled shop towels laundered*.
Facility-wide	2. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13.

**Table 3 Key:**

EU# = Emission Unit Number  
 USEPA = United States Environmental Protection Agency

Laundered\* = Laundry weight before washing

<b>Table 4</b>	
<b>EU#</b>	<b>Record Keeping Requirements</b>
EU1 EU2 EU3 EU4	1. The Permittee shall maintain on-site records of pounds of soiled shop towels laundered* each month and per consecutive 12-month period to determine compliance status with VOC and HAPs (total) emission limits in Table 2, using an emission factor of 1.578 pounds of VOC per 1000 pounds of soiled shop towels laundered*.
Facility-wide	2. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of VOC and HAPs (total) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 <sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/aqforms.htm#report">http://www.mass.gov/dep/air/approvals/aqforms.htm#report</a> .
	3. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	4. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EUs approved herein on-site.
	5. The Permittee shall maintain a record of routine maintenance activities performed on the approved EUs and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	6. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EUs and monitoring equipment, as applicable. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	7. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	8. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**

- EU# = Emission Unit Number
- SOMP = Standard Operating and Maintenance Procedure
- USEPA = United States Environmental Protection Agency
- Laundered\* = Laundry weight before washing

<b>Table 5</b>	
<b>EU#</b>	<b>Reporting Requirements</b>
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify Northeast Regional Office of MassDEP, BWP Permit Chief by telephone at (978) 694-3200 or e-mail at (nero.air@state.ma.us) or fax at (978) 694-3499 as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s request.
	4. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for any emission testing as defined in Table 3 Monitoring and Testing Requirements.
	5. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for any emission testing as defined in Table 3 Monitoring and Testing Requirements.

**Table 5 Key:**  
 EU# = Emission Unit Number

#### **4. SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

<b>Table 6</b>	
<b>EU#</b>	<b>Special Terms and Conditions</b>
Facility-wide	1. The Permittee shall not launder towels with free solvent liquids or that are heavily soiled with solvents.

- B. The Permittee shall install and use exhaust stacks, as required in Table 7, on each of the Emission Units that are consistent with good air pollution control engineering practice and that discharge so as to not cause or contribute to a condition of air pollution. Each exhaust

stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

<b>Table 7</b>				
<b>EU#</b>	<b>Stack Height Above Ground (feet)</b>	<b>Stack Inside Exit Dimensions (feet)</b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
EU1	18.3	2	34.5	185
EU2	17.6	2	34.5	185
EU3	18.5	2	34.5	185
EU4	17.3	2	34.5	185

**Table 7 Key:**

EU# = Emission Unit Number

°F = Degree Fahrenheit

**6. GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial, or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **7. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## **8. APPEAL PROCESS**

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Dhiraj B. Desai by telephone at (978)694-3282 or in writing at the letterhead address.

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Dhiraj B. Desai  
Environmental Engineer

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James E. Belsky  
Permit Chief  
Bureau of Waste Prevention

ecc: Board of Health, 200 Common Street, Lawrence, MA 01840  
Fire Department, 65 Lowell Street, Lawrence, MA 01840  
MassDEP/Boston - Yi Tian  
MssDEP/NERO – M. Altobelli, M. Persky, D. Desai