

Lane Regional Air Pollution Authority
Air Contaminant Discharge Permit

REVIEW REPORT

Aramark Uniform Services

Permit No. 200032

1. General Background Information

Aramark operates an industrial laundry facility in Eugene, Oregon. The source began operation at this location in 1967 and has operated unpermitted until issuance of this permit. Laundry operations at this facility include the washing, drying and sorting of uniforms, linens and floor mats. The facility also launders shop and print towels.

Aramark originally submitted a Title V Permit Application for this facility in July 1996, which was based on emission test data obtained from a sister facility located in Chicago, Illinois. However, emissions data from a sister facility located in Portland, Oregon has been used to update the emission calculations. Based on the resulting updated emission inventory, Aramark requested to reclassify its Eugene, Oregon facility as a synthetic minor source. The Application for a Synthetic Minor Air Contaminant Discharge Permit was submitted to LRAPA on November 24, 1997.

Aramark operates a 6.3 million Btu per hour natural gas-fired boiler, a 3.0 million Btu per hour natural gas-fired water heater, two industrial washers, five natural gas-fired dryers, and one steam-heated dryer.

2. Reasons for Permit Action

The source operates the following processes listed in Table A, Part II of LRAPA Rule 34: Category 61(b) -Sources emitting more than 10 tons per year of hydrocarbons, and Category 58(d) - fuel burning equipment between 10 million and 100 million Btu per hour.

3. Synthetic Minor Limits

The Synthetic Minor permit limits the source's potential to emit to 9.5 tons per rolling 12-month period of any single Hazardous Air Pollutant (HAP) and 24.5 tons per rolling 12-month period of any combination of HAPs. These limits are below the Title V thresholds of 10 tons per year for a single HAP or 25 tons per year for any combination of HAPs. At such time that the HAP emissions exceed these thresholds, the source will become subject to the provisions of Title V permitting requirements.

Aramark maintains that the stack test data obtained for Aramark's sister facility located in Portland, Oregon are representative of its Eugene, Oregon facility operations. Details regarding the stack testing are provided in the report prepared by RMT, Inc., entitled, Print Towel Processing Operations- Air Emissions and Wash Water Loading Factor, dated July 1997. A summary of the emission factors provided in the Synthetic Minor Application are included in the table below. The emission factor provided for wastewater treatment does not differentiate VOCs from HAPs. Therefore it is assumed that all of the VOC's emitted are HAPs as Toluene.

Emission Point	VOC (lb/100 towels)	HAPs (lb/100 towels)	Toluene (lb/100 towels)
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Counting Station	0.0639	0.0088	0.00034
Washers	0.0985	0.0412	0.0321
Dryers	0.0154	0.00039	0.0026
Wastewater Treatment	0.0053	0.0053	0.0053
Total	0.1831	0.0557	0.0403

4. Enforcement History

There have been no enforcement actions taken against this facility.

5. Performance Test Results

There has been no performance testing conducted at this facility. However, in an effort to characterize the emissions associated with the processing of VOC-laden print towels, Aramark conducted sampling activities at four of its industrial laundry facilities (Chicago, IL; Dayton, OH; Sacramento, CA; and Portland, OR). Details regarding the emissions testing are provided in the report prepared by RMT, Inc., entitled, Print Towel Processing Operations- Air Emissions and Wash Water Loading Factor, dated July 1997.

6. Plant Site Emission Limits

Aramark maintains that emissions data derived from their Portland, Oregon facility are representative of the emission expected from the Eugene, Oregon facility. Based on these data, this facility is a major source for toluene, with a Potential to Emit (PTE) 12.17 tons per year. The potential to emit HAPs is 16.59 tons per year. And, the potential to emit VOCs is 51.33 tons per year. These are based on the washer capacity (limiting factor/process bottleneck) of 6400 towels per hour, an operating schedule of 8760 hours per year, and emission factors provided by Aramark.

Baseline Emission Rate

This source existed during the baseline period of 1978, but, does not have records of production for that period. Therefore, following DEQ guidance, it is assumed that baseline emissions were the same as current emission. Therefore, the baseline emission rate for VOC is set at current actual emissions rate. Current actual emissions data was provided in the Print Towel Processing Operations Air Emissions and Wash Water Loading Factors Report submitted in support of the permit application.

Proposed Plant Site Emission Limits (PSELs)

The PSELs in the permit are based on projected operating conditions, as described in the permit application and additional information. The PSEL for VOC is set equal to the baseline emission rate of 4.6 tons per year plus 39.5 tons per year (The Significant Emissions Rate minus 0.5 tons per year). The PSELs for carbon monoxide (CO) and nitrogen oxides (NOx) are based on the total capacity of all fuel burning equipment (23.7 MMBtu/hr). Compliance with CO and NOx limits is assumed since the

limits are based on the capacity of the equipment.

The baseline emission rates, netting baseline, and previous and proposed PSEL are shown below.

Pollutant	Baseline Emission Rate (ton/yr)	Netting Baseline (ton/yr)	Plant Site Emission Limit (PSEL)		
			Previous PSEL (ton/yr)	Proposed PSEL (ton/yr)	PSEL Increase
PM	0.0	0.0	0.0	0.0	0.0
PM ₁₀	0.0	0.0	0.0	0.0	0.0
SO ₂	0.0	0.0	0.0	0.0	0.0
NO _x	1.4	1.4	0.0	10.4	10.4
CO	1.2	1.2	0.0	8.7	8.7
VOC	4.6	4.6	0.0	44.1	+44.1

7. Hazardous Air Pollutants

Aramark has identified and characterized the emissions of 14 Hazardous Air Pollutants from its Portland, Oregon facility. The emissions of toluene are expected to be the highest of the individual HAPs. Therefore, toluene is the limiting factor used to establish the Synthetic Minor Limits. Based on the analysis provided in the report prepared by RMT, Inc., entitled, Print Towel Processing Operations- Air Emissions and Wash Water Loading Factor, dated July 1997, the facility is required to calculate a 12 month rolling total of HAPs for every month, which will ensure that the facility does not exceed the specified HAP limits.

8. Typically Achievable Control Technology (TACT)

LRAPA Title 32-008 requires an existing emission unit at a source to meet TACT if the emissions unit has emissions of criteria pollutants greater than 10 tons per year of any gaseous pollutant or five tons per year of particulate, the emissions unit is not subject to the emissions standards under LRAPA Title 32, Title 33, Title 39, or Title 46 for the pollutants emitted, and the source is required to have a permit. All emissions units at the source meet these criteria. There is no air pollution control equipment installed on these units. LRAPA 32-001 defines TACT for existing sources as the emission level that is typical of emissions units that are similar in type and size as the affected emissions unit. Since commercial laundry facilities typically do not have add-on VOC control equipment, this source meets TACT.

9. New Source Review and Prevention of Significant Deterioration

Because the proposed PSELs for all regulated pollutants are below the Significant Emission Rates (SERs) in LRAPA Title 38, the source is not subject to LRAPA's New Source Review (NSR) requirements.

10. New Source Performance Standards

This facility does not operate any emissions units subject to any New Source Performance Standard.

11. Performance Testing

The permittee is required to perform testing in order to measure VOC and HAP emissions. The results from the performance testing will be used to verify the emission factors used to estimate the emissions contained in this permit. Since the methodology used in the report prepared by RMT, Inc., entitled, Print Towel Processing Operations- Air Emissions and Wash Water Loading Factor, dated July 1997 was used as the basis for this permit, that same methodology will be required in the emission factor verification testing. In summary, the required testing shall utilize SUMMA canisters to collect samples to be analyzed for VOCs using EPA Method TO-14, which uses a gas chromatograph to separate components and a mass spectrometer to identify the individual sample components. This analysis shall also account for the fugitive emissions from the handling of print towels and shop rags, the application and uses of laundry solvents, and quantify the air emissions from the facility's wastewater collection and treatment system. If the results from the testing show that the emission factors used in this permit underestimate the facilities emissions, then the facility is required to apply for a permit modification and pay associated fees to incorporate the new emission factors.

12. Continuous Compliance

The permittee shall keep and maintain an accurate count of all print towels processed to verify compliance with the Synthetic Minor Limits in this permit. Also, the permittee shall maintain records of fuel usage to demonstrate compliance with the PSELs. The permittee will not need to demonstrate compliance with the short-term PSEL, since they need to demonstrate compliance with the long-term PSEL monthly as a 12-month rolling total.

13. Reporting Requirements

The permittee is required to submit an annual summary to document compliance with the Synthetic Minor Limits and PSELs in this permit.

The source is also required to submit an annual summary for the information required by General Condition 13.

14. Public Notice

The draft permit was placed on public notice from October 10, 2000, to November 9, 2000. No written comments were received during this 30-day comment period.