

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

J631123597

FACILITY: DOMESTIC UNIFORM RENTAL		SRN / ID: J6311
LOCATION: 3800 18TH STREET, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Steven Campbell , General Manager		ACTIVITY DATE: 11/07/2013
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: FY 2014 Self Initiated Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Self-Initiated Inspection

INSPECTED BY: Todd Zynda, AQD

PERSONNEL PRESENT: Steven C. Campbell, General Manager/V.P.

FACILITY PHONE NUMBER: 313-831-6700

FACILITY FAX NUMBER: 313-831-2617

FACILITY WEBSITE: www.domesticuniform.com

FACILITY BACKGROUND

Domestic Uniform Rental (Domestic), formerly known as Domestic Linen Supply, is a uniform and linen rental business. The facility located at 3800 18th Street, Detroit, Michigan provides washing, drying, processing, and pressing of uniforms and linens for a variety of customers. Residential properties surround the facility to north and east of the facility, with the nearest residential property approximately 55 feet to the north. To the west of the facility is a vacant lot and unoccupied building. The University of Detroit Mercy School of Dentistry campus is located to the south.

PROCESS OVERVIEW

The facility provides washing, drying, processing, and pressing of uniform and linens through the use of eight industrial sized washers, four industrial gas dryers, three industrial size steam pressers, eight smaller (pant or shirt) steam pressers, and three "shakers" (used for removing lint from wastewater prior to discharge to Detroit Water and Sewerage Department [DWSD]). Domestic also operates one process steam boiler, rated at 49 million British thermal units per hour (MMBtu/hr).

COMPLAINT/COMPLIANCE HISTORY

There have been no complaints for this facility.

There are no records of previous inspections for this facility on file.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VIOLATION NOTICES

None

INSPECTION NARRATIVE

On November 7, 2013 the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) inspector, Mr. Todd Zynda conducted an unannounced level 2 inspection of Domestic. During the inspection, Mr. Steven Campbell, General Manager, provided information and a tour of facility operations relating to air quality permits.

The inspection was conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and Wayne County Installation Permits C-2043 and C-6987.

At 11:00 AM, AQD staff arrived onsite and performed outside observations. Visible emissions were not observed at the time of the inspection. At 11:10 AM Mr. Zynda entered the facility, stated the purpose for the inspection, and was greeted by Mr. Campbell. During the opening meeting the facility operations were discussed. Mr. Zynda explained that MDEQ is evaluating older Wayne County Installation Permits to assess if the facility is still in operation and to evaluate if permitted equipment is still operating. Mr. Campbell was provided a copy of Wayne County Permit Installation Permit C-6987 for the operation of a Clever-Brooks boiler using No. 4 fuel oil. According to Mr. Campbell, the incinerator permitted under C-2043 is no long in use or present at the facility.

Following an introductory meeting, a tour of the facility was conducted. During the tour the eight industrial washers were observed. The washers are electric and are manufactured by G.A. Braun, Inc. with the largest washer rated at 240 volts. Next, the four industrial dryers, also manufactured by Braun, Inc and rated at 2.5 MMBtu/hr, were observed. Each dryer exhaust to its own individual stack located at roof level. According to Mr. Campbell the industrial dryers and washers were installed sometime in the mid-1990's.

Following observation of the industrial dryers and washers, three "shaker" units were observed. The shaker units process wastewater prior to discharge to the sewer, by removing lint and other materials. The "shaker" units operate using electricity.

Following observation of the "shaker" units, the facility boiler was observed. The facility boiler (49 MMBtu/hr), manufactured by Combustion Engineering, operates on natural gas exclusively. According to Mr. Campbell, there is no back up fuel for the boiler. If the natural gas supply is disrupted, the facility shuts down. The boiler plate indicates a construction date of 1973. In addition to the operating boiler, Domestic also has a permanently shut down boiler (Clever-Brooks, DL68). According to Mr. Campbell, the boiler has not operated in a long time, and needs to be removed from the facility. It was determined that Wayne County Installation Permit C-6987 was issued for the Clever-Brooks boiler. During the inspection it was discussed that permit C-6987 would be voided as the boiler is permanently shut down and no longer operational.

Following inspection of the boiler(s), the three industrial steam pressers, and eight smaller (pant or shirt) steam pressers were observed. Steam for the pressers is generated from the boiler at the facility.

APPLICABLE RULES/PERMIT CONDITIONS

Wayne County Installation Permits

The below Wayne County Installation Permits will be voided.

- C-2043 – Incinerator: The incinerator has been removed and is no longer in operation at the facility.
- C-6987 – Clever-Brooks Boiler Capable of Burning #4 Fuel Oil: The boiler has been permanently shut down (but still present at the facility).

Federal Requirements

New Source Performance Standards (NSPS)

40 Code of Federal Regulations (CFR) Part 60, Subpart Dc – "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units". **NOT APPLICABLE.** The boiler in operation at the facility is not subject to Subpart Dc as it was constructed before June 9, 1989. The plate on the boiler indicates a 1973 construction date. According to the Mr. Campbell there have not been significant modifications to the boiler.

Permit to Install Exempt Equipment

Boiler

The boiler plate on the operating boiler indicates a fuel consumption rate of 48,100 cubic feet per hour. Assuming an average gross heating value of natural gas of approximately 1,020 British thermal units per standard cubic foot (Btu/scf) (AP-42, Section 1.4), the rated heat capacity of the boiler is 49 MMBtu/hr. The

boiler is exempt from permit to install (PTI) requirements under the following rule.

R336.1282(b)(i): "Permit to install does not apply to.. Fuel-burning equipment which is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns only... Sweet natural gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour."

Industrial Washers and Dryers

The eight industrial washers and four natural gas industrial dryers are exempt under the following rule:

R336.1281(f): "Permit to install does not apply to...Landry dryers, extractors, or tumblers for fabrics cleaned with only water solutions of bleach or detergents."

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

Not Applicable. All lots are paved.

MAERS REPORT REVIEW:

The facility is not required to submit Michigan Air Emissions Reporting System (MAERS).

FINAL COMPLIANCE DETERMINATION:

The facility is in compliance with current federal and state air quality regulations. Wayne County installation permits C-2043 and C-6987 will be voided as the equipment is no longer in operation at the facility. The boiler in operation at the facility is exempt from PTI requirements under Rule 282(b)(i).

NAME

DATE

SUPERVISOR

[Signature]

11/14/13

W.M.

