

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

P069759225

FACILITY: Cintas Corporation		SRN / ID: P0697
LOCATION: 3149 Wilson Drive NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: John Naklizki , General Manager		ACTIVITY DATE: 07/16/2021
STAFF: Michael Cox	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection		
RESOLVED COMPLAINTS:		

On Friday July 16, 2021, AQD Staff Michael Cox conducted an unannounced scheduled inspection of Cintas Corporation located at 3149 Wilson Drive NW, Grand Rapids, MI 49544. The purpose of this inspection was to verify compliance with Permit to Install No. 82-18 and all other applicable air quality rules and regulations. Michael Cox arrived on site at approximately 1:00 pm and contacted Mr. John Naklizki and Bryan Courtney to conduct the inspection. No visible emissions or odors were noted upon arrival.

#### Facility Description:

Cintas Corporation is a rental and cleaning company for various work uniforms, aprons, shop towels, and floor mats. This facility operates 24 hours a day, 5 days a week. The facility processes approximately 50,000 pounds of material a day and is capable of processing approximately 263,014 pounds of material a day. Soiled materials such as uniforms, shop towels, floor mats, etc. are brought to the facility by truck and placed in bags separated by material type. The bags are weighed and are moved along by a conveyor system to the washing area. After being washed, the material is dumped onto the dryers by an automated system that tilts the washer which dumps the washed material onto a conveyor belt, which then feeds the dryers. Once dried, the material is moved onto another conveyor belt by the same automated process, which is then sorted by customer and location. After sorting, the material is moved along a conveyor system to be shipped by truck back to the customers.

This facility operates 8 washers that are capable of laundering 450 pounds of clean laundry per dryer, 1 washer capable of laundering 250 pounds of clean laundry, 5 dryers capable of drying 500 pounds of clean laundry, and 1 pony dryer capable of drying 170 pounds of clean laundry. The process equipment is fueled by natural gas.

#### Regulatory Overview:

Cintas Corporation is currently operating under PTI No. 82-18, which was issued on October 19, 2018. The facility is categorized as a Synthetic Minor Opt-Out source

due to their potential to emit Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). The facility's 5 dryers and 1 pony dryer are exempt from Rule 201 permitting under Rule 290. The on-site wastewater treatment is exempt from Rule 201 permitting under Rule 285 (2)(m). The facility's 8 washers are exempt from Rule 201 permitting under Rule 291.

#### **Compliance Evaluation:**

After arriving on site, Michael Cox (MTC) contacted Mr. Bryan Courtney and Mr. John Naklizki and presented a State of Michigan identification card and informed them of the intent of the inspection. We met in a conference room, where the terms and conditions of PTI No. 82-18 were discussed and the required records were reviewed. Mr. Courtney emailed the records to MTC for the time period of June 2018 through July 2021. After reviewing PTI No. 82-18 and facility records with Mr. Courtney and Mr. Naklizki, we began the facility tour. Throughout the facility tour, MTC was able to observe all the emission units outlined in the permit: FGFACILITY. There appeared to be no observable changes to any of the process units or associated stacks. Below are the results of the inspection.

#### **FGFACILITY:**

This facility operates 8 washers that are capable of laundering 450 pounds of clean laundry, 1 washer capable of laundering 250 pounds of clean laundry, 5 dryers capable of drying 500 pounds of clean laundry, and 1 pony dryer capable of drying 170 pounds of clean laundry. The process equipment is fueled by natural gas.

#### **Emission Limits:**

Cintas Corporation is subject to the following emission limits:

VOC – 89.9 tpy

HAP – 8.9 tpy

Aggregate HAP – 22.4 tpy

Based on the review of the facility's records for the time period of June 2018 through July 2021 the highest VOC emissions occurred during the 12-month rolling time period ending May 2019 when 4.26 tons of VOC was emitted. The highest individual HAP emission occurred during the 12-month rolling time periods ending in May 2019

through October 2019 when 0.19 ton of Tetrachloroethylene was emitted. The highest aggregate HAP emission occurred during the 12-month rolling time period ending in May 2019 when 0.51 ton of aggregate HAP was emitted.

#### **Material Limits:**

Cintas Corporation is subject to the following material limits:

**Soiled Shop Towels Processed – 23,000,000 lbs./yr.**

**All Textiles Laundered – 73,000,000 lbs./yr.**

Based on the review of the facility's records for the time period of June 2018 through July 2021 the highest amount of Soiled Shop Towels Processed occurred during the 12-month rolling time period ending May 2019 when 789,771 pounds of Soiled Shop Towels was processed. The highest amount of All Textiles Laundered occurred during the 12-month rolling time period ending in March 2020 when 17,531,135 pounds of All Textiles Laundered was processed.

#### **Monitoring/Recordkeeping:**

Cintas Corporation is required to keep monthly records of weight in pounds of laundered shop towels and all other textiles, as well as 12-month rolling weight of these materials in pounds under Special Condition (SC) VI.2. The facility is required to keep a monthly log of fuel usage, including types of fuel burned and amount of fuel burned under SC VI .3. It should be noted that the fuel records required by SC VI.3 do not have an associated fuel limit or specified fuel type in PTI No. 82-18. The facility is also required to keep monthly and 12-month rolling VOC, HAP, and Aggregate HAP emissions as well under SC VI.4 and SC VI.5. These records were readily available on site. Cintas Corporation is keeping the referenced records as required. No issues were noted during the review.

#### **Compliance Determination:**

Based on the information provided and the on-site evaluation, Cintas Corporation appears to be maintaining compliance with PTI No. 82-18 and other applicable air quality regulations.

NAME Michael T. Cox

DATE 7/27/2021

SUPERVISOR HH