



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

October 4, 2018

Mr. Randy Johnson  
Diapers Unlimited: Dydee Service  
814 Nola Street  
Kalamazoo, Michigan 49007

SRN: U391805257, Kalamazoo County

Dear Mr. Johnson:

**VIOLATION NOTICE**

On July 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Diapers Unlimited located at 814 Nola Street, Kalamazoo, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Laundry Operations	R 336.1901 (Rule 201)	The facility's records could not prove that the laundry processes qualify for an exemption to permitting and were not covered under a Permit to Install.

During this inspection, it was noted that Diapers Unlimited could not provide records to show that their laundry operations qualified for an exemption. This facility processes VOC-laden shop towels and uses VOC in some of the laundering products. The facility needs to either submit appropriate calculations and information to show that it qualifies for an exemption, or it needs to submit an application for a PTI.

A program for compliance may include a completed PTI application for the laundry operations process equipment. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right-hand side of the page).

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 25, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Diapers Unlimited believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of the facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Monica Brothers  
Environmental Quality Analyst  
Air Quality Division  
269-567-3552

MB:NE

Enclosure

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Mary Douglas, DEQ

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: Scheduled Inspection

U39180525745238

FACILITY: Diapers Unlimited: Dydee Service		SRN / ID: U391805257
LOCATION: 814 Nola Street, Kalamazoo		DISTRICT: Kalamazoo
CITY: Kalamazoo		COUNTY: KALAMAZOO
CONTACT: Randy Johnson , Owner		ACTIVITY DATE: 07/18/2018
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	
SUBJECT: Unannounced scheduled inspection		SOURCE CLASS:
RESOLVED COMPLAINTS:		

Staff, Monica Brothers, arrived on-site at Diapers Unlimited at about 11:10am. No visible emissions were seen upon arrival. I met with Mr. Randy Johnson, the owner of the facility, and explained that I was there to conduct an air quality inspection. This facility does not currently have any permits with the Air Quality Division and had not been previously inspected.

We first sat down in Mr. Johnson's office so that we could discuss some preliminary questions before taking a tour. Diapers Unlimited is a commercial laundry facility that has about 27 employees that work 8-hour shifts, Monday through Friday. They have three large drum-type washing and drying machines, one 85lb washer, and one home-sized washer. They also have two large industrial dryers. Mr. Johnson said that while they process mostly cloth baby diapers, they also wash many shop rags/towels, as well as 900 roll towels/day. They get most of the used shop towels from uniform and shop towel rental companies, and they could have a variety of solvents on them. Mr. Johnson does not ever know what is on the towels that he launders.

The facility does not have any boilers or generators, but it does have one parts washer. Mr. Johnson said that it is a petroleum-based solvent that is used in it, and they maintain it themselves. He said that they have never had to change the solvent since they first put it in many years ago. I asked Mr. Johnson for some information on the cleaning agents they use at the facility as well as the parts washer solvent. He said that he does not have any SDS sheets for any materials on-site, but he did give me a list of cleaning agents and dyes that are used. He also did not know exactly what was put into the parts washer.

I then let Mr. Johnson know that because he was processing shop towels with VOC solvent on them, he would likely need a permit from the Air Quality Division. I told him that he would need to find out the VOC contents of all of the products that are used in the laundering processes, as well as the amount of shop towels he processes per month. He said that he would be willing to try to obtain whatever information I needed. I thanked him and left the facility around 12:15pm.

Once back at the office, I followed up with Mr. Johnson with an email detailing all of the information I need him to send me. I have not yet heard back from him. This facility is likely violating Rule 201 and will need a permit because they do not meet the requirements for an exemption. More information will be gathered to determine the appropriate path forward.

Update 10-03-18: I received some information about the VOC contents of the laundry products, and there are two products that contain VOC. This would prevent the facility from being able to use the Rule 281(2)(f) exemption for the dryers. The washing process is also externally vented and uses products with VOC, which prevents the facility from being able to use the Rule 281(2)(e) exemption for the washing portion of the process. This means, that the facility needs to either submit an exemption analysis for other exemptions they wish to use, if applicable, or apply for a Permit to Install. A violation notice will be sent for Rule 201 because at the time of inspection, the facility could not provide proof that these processes qualify for exemptions or had a permit.

NAME Monica Brothers

DATE 10/3/18

SUPERVISOR mq/3/2018