DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

FACILITY: GENERAL LINEN AND UNIFORM SERVICE		SRN / ID: P0496
LOCATION: 1016 EAST PALMER, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Tommy Mosey , Plant General Manager		ACTIVITY DATE: 01/14/2014
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self Initiated Inspi	ection	
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Self-Initiated Inspection

INSPECTED BY: Todd Zynda, AQD

PERSONNEL PRESENT: Tommy Mosley, Plant General Manager

FACILITY PHONE NUMBER: 313-875-9435, Ext 301

FACILITY FAX NUMBER: 313-873-0205 FACILITY WEBSITE: www.general-linen.com

FACILITY BACKGROUND

General Linen and Uniform Service (GLUS), formerly known as General Linen Supply, is a uniform and linen rental business. The facility located at 1016 East Palmer, Detroit, Michigan provides washing, drying, processing, and pressing of uniforms and linens for a variety of customers. Property boundaries are as follows: Interstate-75 (I-75) is located to immediately adjacent to the west; a storage lot is located to the south; Safway Scaffolding Company is located to the east; and D.C Buyers, a building company, is located to the north. The nearest residential property is located approximately 0.2 miles to the west, on the west side of I-75.

AQD (Air Quality Division) hard copy files and the Detroit Database indicate a State Registration Number (SRN) of N1703 for the 1016 East Palmer address. The same SRN was also issued to a facility in Merrill, Michigan. As a result, 1016 East Palmer was assigned a new SRN of P0496. AQD files and the Detroit Database will be updated to reflect the new SRN assigned to this address.

PROCESS OVERVIEW

The facility provides washing, drying, processing, and pressing of uniform and linens through the use of eight industrial sized washers, eight industrial natural gas dryers, one steam tunnel, and one natural gas garment finisher (referred to by the company as "hot box"). GLUS also operates one process steam boiler, rated at 10,350 lbs of steam per hour.

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 January 14, 2013 the Michigan Department of Environmental Quality (MDEQ) AQD inspector, Mr. Todd Zynda, conducted an unannounced level 2 inspection of GLUS. During the inspection, Mr. Tommy Mosley, Plant 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 Permit C-6994.

At 12:00 PM, AQD staff arrived onsite and performed outside observations. Visible emissions were not observed at the time of the inspection. At 12:10 PM Mr. Zynda entered the facility, stated the purpose for the inspection, and was greeted by Mr. Mosley. 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.

Following an introductory meeting, a tour of the facility was conducted. During the tour the eight industrial washers were observed. The washers are electric with the largest washer manufactured by Honeywell and rated at 120 volts. Next, the eight natural industrial dryers, steam tunnel, and garment finisher were observed. Laundry equipment appears to be exempt from permit to install (PTI) requirements.

The facility boiler was also observed. The facility boiler, manufactured by Scotch Marine, operates on exclusively natural gas. The boiler plate indicates a capacity rating of 10,350 lbs of steam. The boiler plate indicates a construction date of 1970. According to Mr. Mosley, the fuel oil tanks which were located in the outside storage lot were removed years ago. During the inspection it was discussed that permit C-6987 would be voided as the boiler no longer fires No. 6 fuel oil. The facility boiler is exempt from permit to install requirements under Rule 282(b)(i) as described below.

APPLICABLE RULES/PERMIT CONDITIONS

Wayne County Installation Permits

Wayne County Installation Permit C-6994 (Steam Boiler operating using No. 6 Fuel Oil) will be voided. The facility no longer has the capability to burn fuel oil as the tanks were removed. The boiler currently operates exclusively on natural gas.

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 1970 construction date.

Permit to Install Exempt Equipment

Facility Boiler

The boiler plate on the facility boiler indicates a rated capacity of 10,350 lbs of steam per hour. Using the rate steam capacity and converting to boiler horse power to British thermal units (Btu) the calculated rated heat capacity is 10,043,700 Btu/hr (assuming 1 boiler horsepower [BHP] = 34.5 lbs steam and 1 BHP = 33479 Btu/hr). The boiler is exempt from 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 eight 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 permit C-6994 will be voided as the boiler no longer has the capability to fire No. 6 fuel oil. The boiler in operation at the facility is exempt from PTI requirements under Rule 282(b)(i). AQD files will be updated to reflect the new SRN assigned to 1016 East Palmer address.