DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

P069850308

FACILITY: Cintas Corporation		SRN / ID: P0698	
LOCATION: 421 Bayliss Street, MIDLAND		DISTRICT: Saginaw Bay	
CITY: MIDLAND		COUNTY: MIDLAND	
CONTACT: Gary Puvalowski , Plant Manager		ACTIVITY DATE: 09/06/2019	
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT	
SUBJECT: First inspection			
RESOLVED COMPLAINTS:			

On Friday, September 6, 2019, Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) inspected Cintas Corporation, a laundering facility. Cintas was issued permit 81-18. It contains opt-out limits for VOCs and HAPs as requested by the source. It also contains material limits. Record keeping requirements are also present. This was the first inspection of the facility.

The facility receives, unloads, and sorts soiled laundry. The laundry is then washed and dried. After drying, the laundry is pressed, sorted for final processing. The facility has eight washers and five dryers. A wash load takes approximately 55 minutes. All of the natural gas fired dryers are equipped with lint filters that are periodically checked and cleaned according to Matt Hayes who is in charge of maintenance. Each of the dryers has a separate exhaust stack.

Gary Puvalowski is the Plant Manager and keeps the records required by permit. We went into Gary's office to review records. One of the requirements under condition VI 3 is recording the types and amount of fuel burned. The requirement applies unless the AQD District Supervisor approves the use of "potential to emit" for determining emissions. The tab on the spreadsheet for fuel use was blank. However, Gary did have records of all fuel use. We discussed the situation and I told him to check with the corporate office to see if they wanted to calculate actual emissions from fuel use or use PTE. I also pointed out the fuel use on the tab was in units of ccf, the units on fuel use records was mcf, and the emission factors on the tab were in mmcf. That needed to be relayed to corporate offices also to ensure emissions were calculated correctly.

Later that day Gary provided the updated records. Cintas had decided to calculate emissions from combustion sources using actual fuel usage. The updated records reflected that decision.

Records review showed the facility to be under permit limits in all aspects. On 12 month rolling time periods, the highest emission values were found in August 2019. VOC was 3.07 tons, individual HAP was 0.11 tons, and aggregate HAPs were 0.29 tons. These amounts are far below limits of 89.9 tons, 8.9 tons, and 22.4 tons respectively.

Material limits involve soiled shop towels and all textiles laundered as 22,000,000 pounds and 72,000,000 pounds respectively, on a 12 month rolling time period. Records indicated 435,200 pounds of shop towels in August, 2019 and 10,480,385 pounds of all textiles in June, 2019 to be the highest.

Rule 290 was being used as the permit exemption for the dryers. The calculations were present. The emissions were mere fractions of allowed amounts.

While reviewing records, comments were emailed to Gary and the corporate offices about some display issues. It appears that items are being calculated correctly but the number of digits being displayed in certain areas makes it look incorrect at a glance. Permit exemption 291 was being used for the washers. It was pointed out that rule 291 requires documentation be kept to demonstrate potential emissions are below levels specified in the rule. Though the documentation was not present at this specific point in time, such information was presented during the permitting process.

The facility is considered to be i	n compliance.		0 11
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