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

U41170664349071		
FACILITY: Valley City Linen		SRN / ID: U411706643
LOCATION: 10 Diamond Avenue SE, Grand Rapids		DISTRICT: Grand Rapids
CITY: Grand Rapids		COUNTY: KENT
CONTACT: Jerry Cardani, Plant Manager		ACTIVITY DATE: 06/06/2019
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Scheduled unannoun	ced inspection	· · · · · · · · · · · · · · · · · · ·
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Valley City Linen (VL) facility located in Grand Rapids, MI at 11:13am on June 6, 2019 to complete a scheduled unannounced inspection.

Facility Description

Prior to entering the facility, off-site odors and visible emission observations were completed. The weather conditions at the time of the inspection were partly cloudy skies, upper sixties Fahrenheit, and winds from the east at 0-5mph. Emissions observed appeared to be steam and no identifiable odors were noted.

During the site inspection AQD staff AS met with Mr. Jerry Cardani, Plant Manager, and Mr. Greg Jeltema, Co-Owner, who provided a tour of the facility, answered site specific questions and provided various documents. VL is an industrial laundry facility primarily for the food and hospitality industries. The company does not process industrial shop towels on site but does process maintenance uniforms that would be included from food and hospitality industries. The site currently doesn't operate with an air pollution control permit, but instead utilizes equipment which potentially falls under various air permit exemptions.

Observations

- One natural gas fired boiler that is used for heating operations was observed during the site inspection. The boiler is approximately 12.5 MMBtu/hr in size making it potentially subject to New Source Performance Standards Subpart DC – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. However, the boilers construction date was April 12, 1966. VL staff stated no modifications have occurred to the boiler. The boiler is not subject to NSPS Subpart Dc requirements and appears to be grandfathered thus not subject to Michigan state rules and regulations.
- A large sorting area was observed on the eastern portions of the site. Here materials shipped on site are separated out. It was noted that VL does receive some industry materials such as shop towels that consist of less than one percent of their weekly total received. These materials are not processed on site but instead stored and sent to another facility to be processed. The cleaned materials are then sent back to VL before being shipped to the consumer.
- Nine commercial grade washing units were observed. Once materials that will be processed on site are sorted, they are sent here to be washed. Seven of the wash machines can process 450 lbs of linen per load and one wash machine can process 165 lbs of linen per load. The remaining washing unit was a continuous batch washer that can process 3,000 lbs of linen per hour. Safety Data Sheets (SDS) were requested and provided to verify that the cleaning materials contain no volatile organic compounds (VOCs). Upon review, Ethylene glycol monobutyl ether which is also known as 2-Butoxyethanol and is a known VOC was identified in the laundry detergent used. Additional information regarding the nine commercial grade washing units will be discussed further below.
- Five commercial grade dryers were observed during the site inspection. Materials that are processed in the washing units are next sent here. Each dryer can process 350 lbs of linen per load. Each dryer has a screen to capture lint (particulate) before it is exhausted. Particulate collection bags were observed for each dryer to collect captured particulate. The exhaust ports for the five dryers were observed during the inspection of the roof. Large amounts of white particulate were observed in the area of the five exhaust ports. When this was discussed with VL

staff it appears to be a manufacturing error and VL were discussing the issue with the manufacturing company. On a weekly basis, VL staff clean up the particulate from the dryer vents. Based on the particulate observed not being captured this is a Rule 910 violation. Additional information regarding the five commercial grade drying units will be discussed further below.

Seven commercial grade flat work iron machines were observed during the site inspection. The
units apply steam to materials that have been washed and dried to remove wrinkles. The exhaust
ports for the machines were observed during the inspection of the roof. Some particulate (lint)
was noted in the area around the ports. The particulate is lint carried off from the irons. The ports
are usually kept covered. Once a month they clean the exhaust area of accumulated particulate.

The commercial washing and drying units observed during the course of the site inspection would appear to be exempt per Rule 290, however, records were not available. AQD staff AS provided VL staff with Rule 290 guidance documents. VL staff also contacted Jenifer Dixon, Air Quality Compliance Assistance Specialist, with the Environmental Support Division to help complete applicable Rule 290 records for the washing and drying units to demonstrate compliance. After further review it was decided that once the records are completed, they will be submitted for review, and an addendum to the inspection report will be made to discuss the findings.

Conclusion

VL will be working with Jenifer Dixon of the Environmental Support Division in completing records for the washing and drying units to demonstrate compliance. As stated previously, once the records are completed, they will be submitted for review, and an addendum will be made to the inspection report to discuss the findings. However, at this time VL is not in compliance with all remaining applicable air pollution control rules. A violation notice (VN) will be sent for the following violation.

• During the inspection of the rooftop, large amounts of particulate (lint) were observed coming from the five commercial drying units exhaust vents. This was concluded to be a manufacturing error. Based on the extent of the particulate observed not being captured, this is a Rule 910 violation.

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SUPERVISOR