

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

A192247609

FACILITY: LIBRA INDUSTRIES, INC. OF MICHIGAN		SRN / ID: A1922
LOCATION: 1435 N. BLACKSTONE ST, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Beth Yoxheimer ,		ACTIVITY DATE: 01/14/2019
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Libra Industries, Inc.		
RESOLVED COMPLAINTS:		

### Minor Source: Scheduled Inspection of Libra Industries Inc of Michigan

#### Facility Contacts:

Beth Yoxheimer – President of Libra Industries, Inc.

Phone: 517-787-5675

Email: [byox@librami.com](mailto:byox@librami.com)

Website: [librami.com](http://librami.com)

#### Purpose

On January 14, 2019, I conducted an unannounced compliance inspection of Libra Industries Inc. of Michigan, located within the city of Jackson. I was accompanied by Brian Carley of the Jackson Field Office. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act.

#### Facility Location

The facility is located within the city of Jackson. It is located east of a residential area, and surrounded by a wooded area to the north, south, and west. See Image 1 for an aerial photo.

#### Facility Background

Libra Industries was founded in Jackson, MI in 1969. The facility started out by providing glove cleaning, restoration, and recycling services to manufacturers. Since then, they have expanded to include the distribution of gloves and personal protective equipment (PPE), production of uniforms, work apparel, safety clothing, and industrial supplies, and an industrial absorbents recycling program.

The last inspection of Libra Industries was conducted in April of 2009. At that time, the facility was found to be in compliance. Incidentally, the facility was classified as a Major source under the Title V program because of their Perchloroethylene (PERC) dry cleaning machine. During the April 2009 inspection it was noted that the facility had been in the process of removing their last PERC machine, and AQD staff had advised the facility on how to void their Title V permit. Therefore, the facility no longer has an active permit on file.

#### Regulatory Applicability

There are no active permits on file with AQD for this facility.

The facility has been using permit exemption Rule 290 to operate their Columbia dry cleaning machines.

This facility is subject to 40 CFR part 60 Subpart JJJ – Standard of Performance for Petroleum Dry Cleaners.

#### Arrival & Facility Contact

No visible emissions or odors were observed upon our approach to the facility. We arrived at approximately 9:45 AM, proceeded to the facility office to request access for an inspection, provided our identification, and met with Beth Yoxheimer, who is the President of Libra Industries, Inc. We were joined by Rick and Jordan, the two maintenance managers for the site. A pre-inspection discussion was held with Beth, Rick, and Jordan. We informed them of our intent to conduct a facility inspection and to review the various records as necessary. They

extended their full cooperation during the inspection, accompanied us during the full duration of the inspection, and fully addressed our questions.

### **Pre-Inspection Meeting**

Beth outlined that the facility is currently running two shifts, first and third. They currently have 70 employees, and only three of them work the third shift.

We explained to Beth that the AQD has a special inspection initiative each year, and that this year's initiative is industrial laundromats. We outlined the EPA's recent findings of volatile organic compound (VOC) emissions at industrial drycleaners in the Eastern U.S., and how the shop and print towels the facility's cleaned contributed to the issue. Beth informed us that their facility does little to no shop towel cleaning. They specialize mostly in glove cleaning, but through their Absorb Pro program, they will clean absorbent pads and socks for clients.

Beth explained that they have two different machine systems, one that uses a solvent to clean the product and one that uses water with detergent and a disinfectant. The type of material the gloves are made of, and the type/amount of soil the product has, determines which system the gloves will go through. For the Columbia solvent machines, there are 10 drums and 5 banks, or distillation units. Each distillation unit is shared by two dry-cleaning drums that can run independently of each other.

Rick then explained a little about the waste oils from their Absorb Pro division. He stated that the oils that are cooked out as a byproduct of the dry cleaning are pumped outside into a 5,000-gallon tank. These are then sent offsite to different companies who will use the waste oils for fuel blending. He estimated that they send around 4,000 gallons of waste oils out every 35 days.

### **Onsite Inspection**

Beth, Rick, and Jordan gave us a tour of the facility. We started by entering through a shipping and receiving area where their PPE retail products are housed. Further in, we entered the clean product and packing area. This area is where the clean gloves are packaged up to be sent back to the clients. There was a mild smell of VOC upon entering this area.

Next, we entered the sorting and bundling area. This is where workers inspect the gloves for holes and defects before bundling them up to be packaged. Right after this area is the dry cleaning area. Eight of the Columbia machines are here, lined up in two rows, with enough room to be able to access the front and back of the machines. Some of the machines have a capacity rating of 160 pounds and some of 200 pounds. Rick and Beth informed us that these are dry-to-dry machines, meaning that they will be washed and dried in the same machine, in sequence. In other words, the product goes in dry and comes out dry. Also, Rick explained that the machines have a solvent recovery system on them, so the closed loop process greatly minimizes the loss of solvent compared to their old PERC machines.

The final two Columbia machines are set apart from the main row of machines. This is because these two machines are dedicated solely to the absorbent products that come in. Rick and Beth explained that, though the process of cleaning these is the same as cleaning the gloves, they like to keep the products separate.

### **Recordkeeping Review**

Attachment 1 shows the SDS provided by Beth for the 0-Aromatic 142 Solvent used in the Columbia dry-cleaning machines. VOC properties of the solvent are listed as 794.000 g/liter, converting to 6.626251 lbs/gallon.

Attachment 2 is the manifest documenting the waste oils that were sent out of the facility in 2018. Rick explained that all waste given to "Usher" was waste oil, while the waste given to "Advanced" was only water.

Purchase records discussed on-site indicate that the facility purchases 1750 gallons of solvent 3 times a year. This equates to 5,250.00 gallons/yr or 34,787.82 lbs/yr. Attachment 3 shows these calculations.

The records show compliance with permit exemption Rule 290. With the amount of solvent that they purchase and use per month, each unit's emissions is approximately 289.90 lbs/month. If we look at each pair of units joined by a distillation bank, the emissions still only equal 579.80 lbs/ month. This is well below the limits spelled out in Rule 290(2)(a)(i). Furthermore, a look into the toxic screening level of the solvent shows that the only chemical in it that has a toxics rating is hydrotreated light distillate. The initial threshold screening level (ITSL) of hydrotreated light distillate is 24 µg/m<sup>3</sup>. As defined in R 336.1109, ITSL means "a concentration of toxic air contaminant in the ambient air that is used to evaluate noncarcinogenic health effects from a proposed new or modified process and that is calculated, for regulatory purposes, according to the procedures in R 336.1229(2)." Therefore, the emission of hydrotreated light distillate qualifies under Rule 290(2)(a)(i) as a noncarcinogenic

volatile organic compound.

**Post-Inspection Meeting**

We held a brief post-inspection meeting with Beth, Rick, and Jordan. We discussed their use of the solvent in the Columbia machines, and Beth explained the facility's purchase records, indicating that they purchase 1750 gallons of solvent every 4 months.

We departed the facility around 10:50 AM.

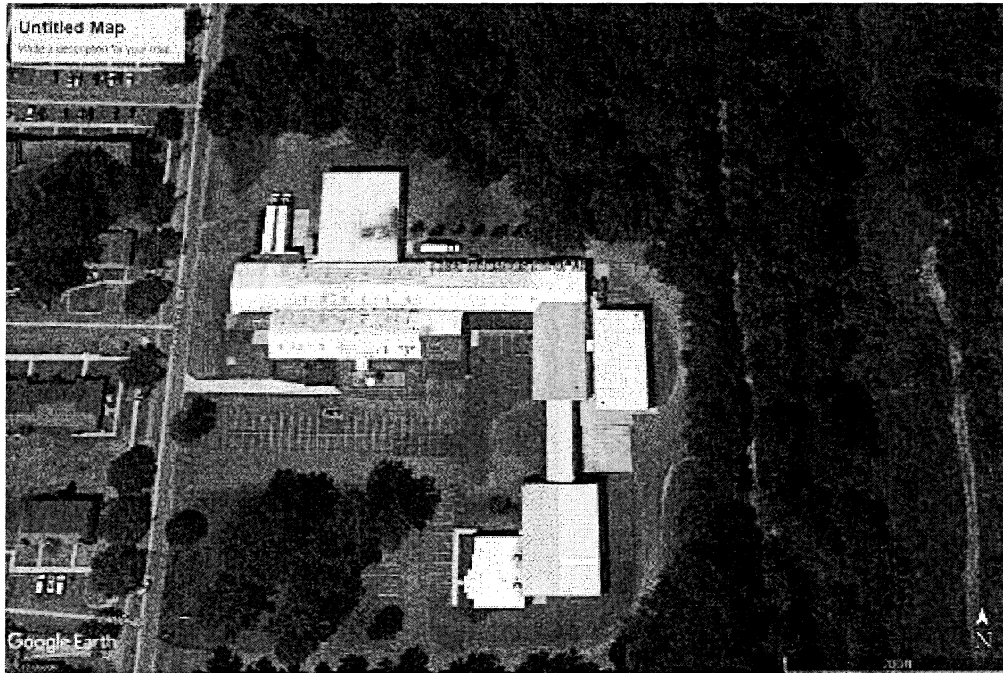
**Compliance Summary**

Permit exemption Rule 290(2)(a)(i) applies to the Columbia dry cleaning machines.

Permit exemption Rule 284(2)(d) applies to the waste oil storage tank. This storage tank is used to house the cooked-out byproduct of the dry-cleaning process, and from there the oil is purchased by an outside company to be used for fuel.

The company uses solvent recovery dryers as required by 40 CFR 60 Subpart JJJ.

Based upon the facility inspection, review of the records, and review of applicable requirements the company was found to be in compliance at the time of this inspection.



**Image 1(Image 1)** : Aerial photo.

NAME Steph Weems

DATE 1.17.19

SUPERVISOR [Signature]