

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN

DEPARTMENT OF

ENVIRONMENT, GREAT LAKES, AND ENERGY



KALAMAZOO DISTRICT OFFICE

LIESL EICHLER CLARK DIRECTOR

July 25, 2019

Mr. Dave Kinderdine Domestic Uniform Rental 3401 Covington Road Kalamazoo, Michigan 49001

SRN: N7298, Kalamazoo County

Dear Mr. Kinderdine:

## **VIOLATION NOTICE**

On July 16, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Domestic Uniform Rental (the facility) located at 3401 Covington Road, 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 336.1201 (Rule 201)	The facility could not provide records that show that their laundering processes comply with an exemption to permitting, and they are also not covered under a Permit to Install.

During this inspection, it was noted that Domestic Uniform Rental could not provide records to show that their laundry operations qualified for an exemption. This facility processes VOC-laden shop towels and therefore does not meet the Rule 281 exemption for cleaning, washing, and drying equipment.

Based on the capacity of the washers at Domestic Uniform, and by using emissions information from other shop towel laundering facilities known to the Department of Environment, Great Lakes, and Energy, preliminary calculations suggest that Domestic uniform has the potential to emit (PTE) VOCs over the thresholds for permitting. 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 Permit to Install (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/air (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 August 15, 2019 (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 EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Domestic Uniform Rental 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,

Morie Water

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

cc: Ms. Mary Ann Dolehanty, EGLE Dr. Eduardo Olaguer, EGLE Ms. Jenine Camilleri, EGLE Mr. Christopher Ethridge, EGLE Mr. Rex Lane, EGLE