

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

P045567797

<b>FACILITY:</b> ELITE CLEANROOM SERVICES		<b>SRN / ID:</b> P0455
<b>LOCATION:</b> 548 S COURT STREET, LAPEER		<b>DISTRICT:</b> Lansing
<b>CITY:</b> LAPEER		<b>COUNTY:</b> LAPEER
<b>CONTACT:</b> Steve Russette , Plant Manager		<b>ACTIVITY DATE:</b> 06/21/2023
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Unannounced joint inspection with AQD and WRD, conducted in response to recent odor complaint.		
<b>RESOLVED COMPLAINTS:</b> C-23-01512		

On 6/21/2023 the Michigan Department of Environment, Great Lakes, and Environment (EGLE), Air Quality Division (AQD) and Water Resources Division (WRD), conducted a scheduled inspection of Elite Cleanroom Services. This was in response to a recent complaint alleging that odors coming from a city storm sewer and manhole cover matched odors being exhausted from the plant itself.

**Environmental contact:**

Steve Russette, Plant Manager; 810-667-8940; [steve@elitecleanroom.com](mailto:steve@elitecleanroom.com)

**EGLE contacts:**

- Dan McGeen, AQD inspector, Lansing District Office (DO); 517-648-7547; [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov)
- Spencer Matthews, WRD inspector, Lansing/Jackson DO's; 517-230-9665; [mathewss4@michigan.gov](mailto:mathewss4@michigan.gov)

**Facility description:**

This facility launders cloth rags used for cleaning at industrial facilities.

**Emission units:**

Emission Unit* ID	Emission Unit Description	Permit to Install (PTI) or Michigan Air Pollution Control (MAPC) Rule	Compliance status
EUWASHPROCESS	Nine (9) industry standard washers	PTI 101-13B	Compliance
EUDRYER1	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
EUDRYER2		PTI 101-13B	Compliance

	Natural gas-fired industry standard dryer		
EUDRYER3	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
EUDRYER4	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
EUDRYER5	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
EUDRYER6	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
EUDRYER7	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
EUDRYER8	Natural gas-fired industry standard dryer	PTI 101-13B	Compliance
Three (3) additional dryers	Three (3) additional natural gas-fired dryers	Rule 282(b)(2)(i)	Compliance

\*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

**Flexible Group summary table:**

Flexible Group* ID	Flexible Group Description	Associated Emission Unit IDs
FGLAUNDRY	Nine (9) industry standard washers and eight (8) industry standard dryers, plus	EUWASHPROCESS, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4,

	three (3) additional dryers installed under MAPC Rule 282(b)(2)(i)	EUDRYER5, EUDRYER6, EUDRYER7, EUDRYER8
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\*A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.

#### Regulatory overview:

This facility is considered to be a true minor source, rather than a major source of air emissions. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

This facility is also considered a minor, or *area source*, for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs. As stated previously by the facility, they use zero HAPs.

The facility has an air use permit, Permit to Install (PTI) No. 101-13B. There are no HAPs in their raw materials that they use, according to the permit evaluation notes in the PTI, but they are allowed to use materials with toxic air contaminants (TACs). The most notable among these is propylene carbonate, but the plant subsequently eliminated that from their raw materials, in 2017.

The previous PTI, No. 101-13 A, allowed for use of Diethylene glycol monobutyl ether (DGME), which was found in the Uniclean cleaning product. However, the Uniclean product is no longer used here, as of 2015 or 2016.

The facility also has natural gas-fired processes which are exempt under Michigan Air Pollution Control (MAPC) Rule 282(2)(b)(i) from the requirement to obtain a permit to install, because the total heat input capacity of 1.7 million Btu/hr is less than the 50 million Btu/hr threshold. These processes include a natural gas-fired air makeup unit, gas heater, and hot water heaters. They were installed as exempt under Rule 282(b)(i), originally, and on 12/20/2016, this rule was revised as 282(2)(b)(i).

In March of 2018, Robert Schodowski, then General Manager, contacted AQD to discuss the potential addition of 2 or possibly 3 new dryers for drying laundry. Michigan Air Pollution Control (MAPC) Rule 282(2)(b)(i) provides an exemption for natural gas-fired heating processes where each unit has a rated heat input capacity of not more than 50 million Btu per hour, as follows:

(b) 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 the following fuels:

(i) Sweet natural gas, synthetic 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.

The permit engineer's review of the permit did not consider the emissions from the burning of natural gas in the 8 original dryers to be noteworthy enough to limit the natural gas throughput on an annual basis. The 8 original dryers all combined would only add up to 1.7 million Btu/hr, far below the 50 million Btu/hr threshold for a single unit.

AQD has been advised in previous years that when they tweak the formula for their cleaning products, they are staying under the 0.1 millimeters of mercury vapor pressure exemption threshold of Rule 281(2)(e). Other exemptions which may relate to the reformulation of cleaning products used onsite include Rule 285(2)(b)(i)(A) and 285(2)(c)(iii).

#### **Rule 285(2)(b)(i)(A) exempts:**

(b) Changes in a process or process equipment which do not involve installing, constructing, or reconstructing an emission unit and which do not involve any meaningful

change in the quality and nature or any meaningful increase in the quantity of the emission of an air contaminant therefrom.

(i) Examples of such changes in a process or process equipment include, but are not limited to, the following:

(A) Change in the supplier or formulation of similar raw materials, fuels, or paints and other coatings.

**Rule 285(2)(c)(iii) exempts:**

(c) Changes in a process or process equipment that do not involve installing, constructing, or reconstructing an emission unit and that involve a meaningful change in the quality and nature or a meaningful increase in the quantity of the emission of an air contaminant resulting from any of the following:

(i) Changes in the supplier or supply of the same type of virgin fuel, such as coal, no. 2 fuel oil, no. 6 fuel oil, or natural gas.

(ii) Changes in the location, within the storage area, or configuration of a material storage pile or material handling equipment.

(iii) Changes in a process or process equipment to the extent that such changes do not alter the quality and nature, or increase the quantity, of the emission of the air contaminant beyond the level which has been described in and allowed by an approved permit to install, permit to operate, or order of the department.

**The two natural gas-fired hot water heaters at a facility which is considered a minor, or area source of HAPS may be considered exempt from the area source boiler MACT, 40 CFR Part 63, Subpart JJJJJJ, National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. A hot water heater at an area source would not be subject, under Section 63.11195(f). To meet the definition of a hot water heater in this area source Generally Achievable Control Technology (GACT) standard, the unit must be no more than 120 gallons in capacity. Each hot water heater has a capacity of less than 50 gallons per unit. AQD has not been delegated authority to enforce Subpart JJJJJJ.**

**Fee category:**

**This facility is not considered fee-subject, because it is not a major source for either criteria pollutants or HAPs, and it is neither subject to federal New Source Performance Standards nor Maximum Achievable Control Technology regulations.**

**This facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS). Criteria for those facilities which must report to MAERS on an annual basis are identified in AQD-013: Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory. The threshold for a source of VOCs to be required to report to MAERS is 10 TPY or more of VOCs.**

**Location:**

**The facility's address is 548 S. Court Street, in Lapeer, Lapeer County. It is located at the northern edge of an industrial park within the City of Lapeer. There are industries to the immediate west and the immediate south. There are industries to the east. To the north is a small parking lot, followed by residences. The nearest residences are about 100 feet to the north and to the northwest.**

**Operating schedule:**

- 4 days per week
- 2 shifts, starting at 4:00 AM, and ending at 12:00 AM

**Facility history:**

In 2012 and 2013, AQD had investigated several odor complaints which were attributed to Elite Cleanroom Services. The company went through New Source Review and obtained a PTI for their cleaning processes. They additionally pursued reformulating some of their cleaning products which they use onsite. Until now, no complaints had been received since September of 2013.

**Inspections within last 5 years:**

- 8/20/2019; no instances of noncompliance.
- 4/11/2017; no instances of noncompliance.

**Violations within last 5 years:**

None.

**Current complaint:**

On 6/13/2023, AQD received the most recent complaint, discussed below:

*C-23-0152; alleging odors on 6/12 at 10:47 AM. The complainant stated that a strong odor was present in city storm drains and near city sewer openings. They said this was identical to an odor when Elite Cleanroom Services emits "visible fumes."*

Because the complaint refers in large part to odors coming from city storm drains and sewer openings, AQD shared the complaint with WRD, and their inspector Spencer Matthews, Environmental Quality Analyst (EQA), was assigned. AQD inspector Dan McGeen, EQA, and S. Matthews agreed to meet in the parking lot north of Elite Cleanroom Services on 6/21/2023.

**Odor evaluation:**

Upon arrival in the area, D. McGeen conducted a drive-by odor evaluation near Elite Cleanroom Services.

- Arrival in vicinity: 9:47 AM
- Weather conditions: Sunny, hazy from wildfire smoke, and 74 degrees F, with winds 5 miles per hour (mph) out of the east
- Route taken: McCormick Avenue to Saginaw Street north to Elm Street to S. Court Street.

Odors detected were as follows:

Location	Time	Odor Level	Odor Description	Comments
McCormick Dr.	9:48 AM	1	Plastic	North of Delta Faucet, a plastic parts manufacturer

McCormick Dr. and S. Saginaw St.	9:48 AM	2	Unknown	Was unable to identify a suspected source
Parking lot north of Elite Cleanroom Services	9:52 AM, est.	2	Herbal/plants	Just after arrival
North side of drive running parallel to Elite Cleanroom Services' north property line	9:57 AM, approx.	2	Solvent	North of NW corner of Elite Cleanroom Services

The 0 to 5 odor scale used by AQD reads as follows:

- 0 - Non-Detect
- 1 - Just barely detectable
- 2 - Distinct and definite odor
- 3 - Distinct and definite objectionable odor
- 4 - Odor strong enough to cause a person to attempt to avoid it completely
- 5 - Odor so strong as to be overpowering and intolerable for any length of time

The level 2 solvent odor detected on the north side of the drive running parallel to the north property line of Elite Cleanroom Services was determined to be insufficient at this time to constitute a violation of MAPC Rule 901(b), which prohibits unreasonable interference with the comfortable enjoyment of life and property.

**Arrival:**

- Arrival in parking lot north of site: 9:51 AM, with AQD immediately behind WRD.
- Weather conditions: Sunny, hazy from wildfire smoke, and 74 degrees F, with winds 5 miles per hour (mph) out of the east
- Visible emissions detected: None
- Odors detected: See table above, for odors detected at 9:52 AM, est., and 9:57 AM, approx.

As discussed in the section above, the level 2 solvent odor detected on the north side of the drive running parallel to the north property line of Elite Cleanroom Services was determined to be insufficient at this time to constitute a violation of MAPC Rule 901(b), which prohibits unreasonable interference with the comfortable enjoyment of life and property.

D. McGeen and Spencer Matthews walked around to the south side of the plant. No visible emissions were detected.

Upon entering the lobby, AQD and WRD staff presented their credentials, per procedure. They were introduced to Steve Russette, Plant Manager, who explained that Bob Schodowski, General Manager, has recently retired, but he makes his knowledge and experience with chemistry available to the company, as needed.

**Pre-inspection meeting:**

D. McGeen asked about any changes since the 2019 inspection by AQD. S. Russette explained that they are using the same detergent in their washers as in 2019, and there is no change in the chemistry. The volume of work has slowed, from 5 days/week in 2019 to 4 days/week, at present, with 2 shifts, from 4:00 AM to 12:00 AM. The industrial rags that they wash contain the same "soil" or materials to be washed out as in 2017.

S. Russette explained that their customers include:

- wood cabinet makers, who send rags with furniture stain on them.
- A number of auto manufacturers, who send them rags with a caulk-like sealer on them.

S. Russette said that cabinet makers are a slightly smaller percentage of their overall business since 2019. He explained that business is down a bit with both cabinet makers and auto manufacturers because they are using more automation in their plants, resulting in less rags from cleanup of manually applied stains or sealers.

**Inspection:**

AQD and WRD were shown the washing and drying equipment, some of which was in use. As described in the PTI, the washers are programmed to wash at various times and temperatures, while the dryers are programmed to dry at various times and temperatures.

AQD and WRD staff were also shown some of the soiled rags that they receive, from both cabinet makers and auto manufacturers, as they walked through the plant. The caulk-like sealant on the auto manufacturing rags had a mild, barely detectable scent. A hallway of laundry bins where loads were being assembled contained a mild scent, as well. These odors had not been noticeable outside the plant. Large fabric covers for robots used in the auto industry had a barely detectable, musty paint scent to them, which was noticeable when leaning over a laundry bins. This odor had not been detectable outside the plant, either.

EGLE staff were shown that roughly since 2021, a horizontal air intake had been installed in the plant's north wall, near the floor. Also, in June 2021, a small exhaust fan for worker comfort was added to the north wall, to remove some of the heat and humidity inside the plant. Because this was for general room or building ventilation, it does not appear to trigger the requirement of MAPC Rule 201 to have a permit to install. Similarly, a small exhaust fan was added to the west wall of the plant, for plant ventilation.

On the wash floor, it was explained that 5 washing machines are used to run sealer rags, while robot covers are washed in a single, dedicated machine, washer #1, with one backup machine for robot covers. Every washing machine is said to be put through a self-cleaning cycle after washing a load.

Since 2018, they have reportedly used ozone devices to inject ozone to the wash water, for the purpose of cleaning the air and adding a fresh smell to the laundry.

Plant wash water gets recycled, it was explained. EGLE staff were shown the wastewater treatment processes onsite. A shaker shakes out any kind of solids, such as paint buildup, lint, or food, while water goes into a tank. In a subsequent tank, a vortex is used to allow heavy particles to settle out. A pump adds clay to the wastewater to solidify remaining contaminants that can be solidified. A centrifuge removes solids, which are primarily zinc and calcium, so that they can be landfilled. A Palin unit has a filter, which further cleans the wastewater for anything which did not come out in the centrifuge or settle over the weekend. At this point, the wastewater goes back to the City of Lapeer for treatment, via the sanitary sewer. Zinc, oil, grease, and total suspended solids are monitored.

EGLE staff were shown a tote of Elite Aromatic 100, which was sealed, and no odors were present. It is said to be the only VOC containing compound they use.

Compliance with the special conditions of PTI 101-13B was checked, below:

**Compliance check with PTI No. 101-13B:**

PTI 101-13B, FGLAUNDRY	Requirement	Comments	Complies?
FGLAUNDRY, SC I.1	VOC limit of 10.7 TPY, as determined over a 12-month rolling time period at the end of each calendar month.	The attached records show 12-month rolling VOC emissions in January 2023 were 8.43 tons, based on the company's belief that 55% of the VOCs from their raw materials are captured in the water. On 8/25 and 9/21/2023, AQD requested data to support this. The company replied on 9/21 that they would collect samples that day, and results could typically be expected within 2 weeks. If VOCs are not captured in water, the rolling value would be 18.71 tons, over the 10.7 TPY limit. AQD is awaiting data and will make a determination upon receipt.	No
FGLAUNDRY, SC II.1	Throughput limit of propylene carbonate of 20,000 lbs/year, as determined over a 12-month rolling time period at the end of each calendar month.	S. Russette explained the facility has not used propylene carbonate since 2017.	Yes
FGLAUNDRY, SC III.1	Permittee shall handle all VOC and / or HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.	All totes and any other containers of detergents and other washing chemicals were covered.	Yes
FGLAUNDRY, SC IV.	NA	NA	NA

FGLAUNDRY, SC V.	NA	NA	NA
FGLAUNDRY, SC VI.1	Permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	The format without data to support the company's belief that 55% of the VOCs are captured in water rather than emitted to the ambient air is not acceptable to AQD. On 9/21/2023, the company indicated they were taking samples that day. AQD will evaluate the data upon receipt, and make a determination.	No
FGLAUNDRY, SC VI.2	Permittee shall maintain a current listing from the manufacturer of the chemical composition of each cleaner and solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets (MSDS), manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.	S. Russette indicated that they maintain a binder of MSDS sheets at the site.	Yes
FGLAUNDRY, SC VI.3	Permittee shall keep the following information on a monthly basis for FGLAUNDRY:		Yes
FGLAUNDRY, SC VI.3.a	Gallons or pounds (with water) of each cleaner and solvent used.	The attached VOC spreadsheet lists monthly and yearly usage of ARO-100, the only current cleaner or solvent with any VOC content. AQD was informed that they keep weekly records of usage of other cleaners and solvents, and on 8/21/2023, AQD requested records for June 2023. S. Russette emailed a copy of their "2023 Chemical Increase	Yes

		& Usage” spreadsheet for the year to date (YTD), attached.	
<b>FGLAUNDRY, SC VI.3.b</b>	<b>VOC content, in percent by weight, of each cleaner and solvent.</b>	<b>VOC is 100% by weight in ARO-100. This is said to be the only cleaner or solvent with any VOC content, and is reflected in the facility’s VOC recordkeeping, please see attached VOC spreadsheet.</b>	<b>Yes</b>
<b>FGLAUNDRY, SC VI.3.c</b>	<b>VOC mass emission calculations determining the monthly emission rate in tons per calendar month.</b>	<b>The attached VOC spreadsheet for 2018-2023 shows monthly VOC emissions in tons. For 2023, the monthly emissions were reported as:</b> <ul style="list-style-type: none"> <li>• Jan.: 0.57 tons</li> <li>• Feb.: 0.75 tons</li> <li>• Mar.: 0.75 tons</li> <li>• April: 0.70 tons</li> <li>• May: 0.75 tons</li> </ul>	<b>Yes</b>
<b>FGLAUNDRY, SC VI.3.d</b>	<b>VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.</b>	<b>The attached records for 2018-2023 show 12-month VOC emissions.. The 12-month rolling values in 2023 were as follows:</b> <ul style="list-style-type: none"> <li>• Jan.: 8.43 TPY</li> <li>• Feb.: 8.31 TPY</li> <li>• Mar.: 8.31 TPY</li> <li>• April: 7.15 TPY</li> <li>• May: 8.31 TPY</li> </ul>	<b>Yes</b>
<b>FGLAUNDRY, SC VI.4</b>	<b>Permittee shall keep, in a satisfactory manner, records of the amount of propylene carbonate used in pounds per calendar month and pounds per 12-month rolling time period as determined at the end of each</b>	<b>S. Russette explained the facility has not used propylene carbonate since 2017. Propylene carbonate use is not shown as having been used in plant recordkeeping. Usage</b>	<b>Yes</b>

	calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request.	would therefore be 0.0 pounds per calendar month and 0.0 pounds per 12-month rolling time period.	
<b>FGLAUNDRY, SC VII.</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>
<b>FGLAUNDRY, SC VIII.</b>	The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:	Exhaust gases were discharged unobstructed vertically upwards through the stacks in the table below, with no-loss rain sleeves, satisfying this requirement. Other stacks, which had caps, were actually air intakes, AQD was informed.	Yes
<b>FGLAUNDRY, SC VIII.1</b>	<b>SVDRYER1: Max. diameter of 12 inches and minimum height above ground of 22 feet</b>	This exhaust stack appeared to meet these specifications.	Yes
<b>FGLAUNDRY, SC VIII.2</b>	<b>SVDRYER2: Max. diameter of 12 inches and minimum height above ground of 22 feet</b>	This exhaust stack appeared to meet these specifications.	Yes
<b>FGLAUNDRY, SC VIII.3</b>	<b>SVDRYER3: Max. diameter of 12 inches and minimum height above ground of 22 feet</b>	This exhaust stack appeared to meet these specifications.	Yes
<b>FGLAUNDRY, SC VIII.4</b>	<b>SVDRYER4: Max. diameter of 8 inches and minimum height above ground of 22 feet</b>	This exhaust stack appeared to meet these specifications.	Yes
<b>FGLAUNDRY, SC VIII.5</b>	<b>SVDRYER5: Max. diameter of 10 inches and minimum height above ground of 22 feet</b>	This exhaust stack appeared to meet these specifications.	Yes
<b>FGLAUNDRY, SC VIII.6</b>	<b>SVDRYER6: Max. diameter of 10 inches and minimum height above ground of 22 feet</b>	This exhaust stack appeared to meet these specifications.	Yes
			Yes

FGLAUNDRY, SC VIII.7	SVDRYER7: Max. diameter of 10 inches and minimum height above ground of 22 feet	This exhaust stack appeared to meet these specifications.	
FGLAUNDRY, SC VIII.8	SVDRYER8: Max. diameter of 10 inches and minimum height above ground of 22 feet	This exhaust stack appeared to meet these specifications.	Yes
FGLAUNDRY, SC VIII.9	SVGENEXHAUST (horizontal): Max. diameter of 24 x 24 inches, and minimum height above ground level of 15 feet	This horizontal exhaust outlet appeared to meet these specifications.	Yes
FGLAUNDRY, SC IX.	NA	NA	NA

(End of permit special conditions)

**Post-arrival odor evaluation:**

Near the end of the inspection, EGLE staff and S. Russette checked for odors outdoors. There were no visible emissions detectable from the dryer exhaust stacks, which are topped with cylindrical rain sleeves, or from the boiler exhaust stack. The stacks for emitting steam from the individual washers were said to be out of sight, atop the roof. Two large, short stacks which exit the north wall and have conical rain caps are air intakes, AQD was informed.

S. Russette, and AQD and WRD staff checked for odors outside the plant, beginning with a plant storage building which sits south of the main plant. No odors were detected. To the west of the main plant, adjacent to a downward facing vent for general plant ventilation, there was a barely detectable sludge odor, similar to the odor from solids removed from the wash water. It was not at levels sufficient to violate MAPC Rule 901(b). To the immediate west of the plant is an industrial property.

in the alley immediately north of the plant was a barely detectable odor of solvent, possibly with a detergent component to it. Here, EGLE staff and S. Russette were joined by the City of Lapeer WWTP Superintendent Tom Woolley, and Toby, a WWTP mechanic. The group checked for odors in areas north, northeast, and northwest of the plant.

Weather conditions: Sunny, hazy, and 74 degrees F, with winds 0-5 mph out of the east

**Odors detected were as follows:**

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Location	Time	Odor Level	Odor Description	Comments
Alley N of plant, by plant's NW corner	10:53 AM	1	Solvent, possibly with a hint of detergent	City of Lapeer WWTP staff met with EGLE staff and S. Russette, to take part in odor evaluation.
Manhole opening in S. Court St.	11:08 AM	0		
Sanitary sewer	11:09 AM	1	Possibly reminiscent of Elite Cleanroom Services detergent	Odor was for a moment.
S. Court St. & S. Elm St.	Approximately 11:10 AM	2	Cannabis smell	Cannabis processing plant to the immediate east.
S. Elm St., a few hundred feet west of Elite Cleanroom Services	11:19 AM	2	Flowering peonies	Flowering plants were in a residential front yard.

The momentary, barely detectable odor from the sanitary sewer which was reminiscent of the detergent scent from Elite Cleanroom Services was insufficient to constitute a violation of MAPC Rule 901(b).

**Post-inspection meeting:**

AQD informed S. Russette that no instances of noncompliance were determined as a result of the inspection. D. McGeen requested a copy of facility VOC recordkeeping, year to date, which S. Russette agreed to. AQD departed the site at 11:27 AM.

Later that day, S. Russette emailed a copy of the facility VOC records from 2018-2023; please see attached. The records were subsequently reviewed, and the results are discussed in the PTI compliance checklist, earlier in this activity report. No instances of noncompliance were found.

**Post-inspection activities:**

- AQD Lansing District Supervisor Bob Byrnes noted that the VOC emission calculations by Elite Cleanroom Services assumed that 55% of the VOCs in their raw materials were not released to the ambient air.
- 8/25/2023: D. McGeen subsequently emailed the company on 8/25/2023, to inquire. S. Russette explained that their calculations assume that 55% of the VOCs are captured by water. He indicated he would try to obtain supporting data early next week.
- 9/21/2023: Not having received a response. D. McGeen informed the company if AQD did not have supporting data by 9/29 AQD would consider 100% of the VOCs as being released to atmosphere, putting Elite Cleanroom over the 10.7 TPY VOC emission limit. S. Russette indicated that they would take samples this day with a typical 2-week turn around time for results.

#### **Compliance concerns:**

- PTI 101-13B, FGLAUNDRY, SC I.1 limits VOC emissions to a 12-month rolling average of 10.7 TPY. The attached records show 12-month rolling VOC emissions in January 2023 were 8.43 tons, based on the company's belief that 55% of the VOCs from their raw materials are captured in the water. If VOCs are not captured in water, the rolling value would be 18.71 tons, over the 10.7 TPY limit. AQD is awaiting data to support the company's conclusion, and will make a determination upon receipt, but for now the emission limit appears to have been exceeded.
- PTI 101-13B, FGLAUNDRY, SC Vi.1 requires, in part, that the permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor. The format, without data to support the company's belief that 55% of the VOCs are captured in water rather than emitted to the ambient air, is not acceptable to AQD. On 9/21/2023, the company indicated they were taking samples that day. AQD will evaluate the data upon receipt and make a determination.

#### **Conclusion:**

**Because supporting data for the company's position that 55% of their VOCs are captured in water has not been made available yet to AQD, AQD is unable to verify the company's VOC emission calculations. AQD is awaiting supporting data from them and will make a determination upon receipt. Without that supporting data, the January 2023 rolling 12-month VOC emissions appear to have been potentially 18.71 tons, over the permitted limit. A Violation Notice will be sent.**

NAME 

DATE 9/21/2023

SUPERVISOR 