

P0693

MANUA

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

P069349594

FACILITY: Cintas Corporation		SRN / ID: P0693
LOCATION: 39145 Webb Drive, WESTLAND		DISTRICT: Detroit
CITY: WESTLAND		COUNTY: WAYNE
CONTACT: Dave Baldwin , Production Manager		ACTIVITY DATE: 01/24/2019
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Synthetic Minor
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : January 24, 2019  
 TIME OF INSPECTION : 9:45 am  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Dave Baldwin, Production Manager  
 FACILITY PHONE NUMBER : 734-326-0800 ext. 75931  
 FACILITY EMAIL : BaldwinD@cintas.com

### FACILITY BACKGROUND

Cintas is a rental and cleaning company for work uniforms, shop towels, and floor mats. This location operates 24 hours a day, 5 days per week. The facility processes approximately 85,000 pounds of material per day.

### REQUIRED PPE

During the onsite inspection, I wore steel toed safety shoes and eye protection.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. No violations have been issued regarding this facility.

### PROCESS EQUIPMENT AND CONTROLS

Soiled items, such as uniform shirts and pants, shop towels, and floor mats, are brought to the facility by truck and placed in laundry bags separated by type. These bags are then weighed and moved along a conveyer system to the washing area. The facility operates 9 washing machines, capable of laundering 450 pounds per load, and 5 dryers. This equipment is powered by natural gas. After being laundered, the items are moved by a conveyor system to be further sorted by customer and location. All uniforms are labeled with a bar code to identify the customer renting the item. Typically, a company rents 11 uniforms per employee, allowing for a week of clean uniforms, a week of uniforms being laundered, and a uniform being worn.

### INSPECTION NARRATIVE

I arrived at the facility and did not smell any odors in the parking lot or lobby of the facility. Next, I entered the facility and met with Mr. Baldwin. Together, we discussed the operations at this location and the permit, which was recently obtained by this facility. Mr. Baldwin was aware of the permit and the record keeping requirements, which are typically handled by the corporate office. I asked Mr. Baldwin to email me the records for the past three months.

Next, we walked through the facility. Soiled items are brought in, sorted into laundry bags and weighed. The weight is recorded electronically and can be reviewed throughout the washing process. The laundry bags are conveyed along the roof to the washing area. Here the 9 washers (450 pound capacity) and 5 dryers (450 pound capacity). After being washed and

dried, the items are sorted and prepared to be returned to the customer.

### **APPLICABLE RULES/PERMIT CONDITIONS**

This facility currently operates by Opt-Out permit 83-18, which was issued on October 26, 2018. The only emission unit, FGFACILITY, is for all process equipment at this facility. The special conditions are as follows:

I. Emission Limits

1. VOC – Compliance. Based on a review of the records, the facility has emitted about 3 tons of VOC during the seven months of operation. This is significantly lower than the permitted limit of 89.9 TPY.
2. Individual HAP – Compliance. Based on a review of the records, the facility has emitted less than 1 ton of any individual HAP during the seven months of operation. This is significantly lower than the permitted limit of 8.9 TPY.
3. Aggregate HAP – Compliance. Based on a review of the records, the facility has emitted less than 1 ton of aggregated HAPs during the last seven months of operation. This is significantly lower than the permitted limit of 22.4 TPY.

II. Material Limits

1. Compliance – The facility has operated under the permit limit of laundering less than 23,000,000 pounds of shop towels per year based on a 12-month rolling average. The facility has not been operating under this permit for 12 months at the time of the inspection, however, since June 2018, the highest 12-month rolling average is 512,960 pounds, which covers seven months. This value is significantly less than the permitted limit.
2. Compliance -- The facility has operated under the permit limit of laundering less than 73,000,000 pounds of all textiles per year based on a 12-month rolling average. The facility has not been operating under this permit for 12 months at the time of the inspection, however, since June 2018, the highest 12-month rolling average is 12,323,595 pounds, which covers seven months. This value is significantly less than the permitted limit.

III. Process / Operational Restriction – NA

IV. Design / Equipment Parameters – NA

V. Testing / Sampling – NA

VI. Monitoring / Recordkeeping

1. Compliance – The facility maintains all required records in an acceptable format that was promptly ready for my review.
2. Compliance – The facility maintains monthly and 12-month rolling time period records for all materials laundered. A copy of the collected records is attached to this report.
3. Compliance – The facility maintains fuel usage records. A copy of these records is attached to this report.
4. Compliance – The facility maintains VOC emission records both monthly and 12-month rolling time period. A copy of these records is attached to this report.
5. Compliance – The facility maintains HAP emission records both monthly and 12-month rolling time period for individual and aggregate HAPs. A copy of these records is attached to this report.

VII. Reporting – NA

VIII. Stack / Vent Restrictions – NA

IX. Other Requirements – NA

The facility operates one boiler at this location which is less than 6.8 MMBtu / hr. The facility

operates one steam tunnel which is less than 1.6 MMBtu / hr. The facility operates six dryer burners which are less than 2.8 MMBTU / hr each. The facility operates twenty-one heaters and fans which are less than 2.5 MMBTU / hr each. This equipment is exempt from permitting by Rule 282 (b)(i).

The facility operates eleven washers at this location which are exempt from permitting by Rule 291. The facility operates six dryer units which are exempt from permitting by Rule 290. The facility operates one wastewater treatment process which is exempt from permitting by Rule 285(2)(m). An explanation from the company regarding these exemptions is attached to this report.

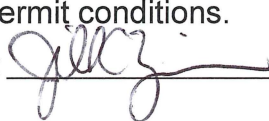
### MAERS REPORT REVIEW

On August 2, 2019 Amie Hartman with EGLE was contacted to add this facility to MAERS. Ms. Hartman contacted Mr. Baldwin and inform him that the facility would need to complete MAERS annually in the future.

### FINAL COMPLIANCE DETERMINATION

Cintas appears to be operating in compliance with all state and federal regulations, as well as all permit conditions.

NAME



DATE

8/8/19

SUPERVISOR

JK