

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

P069859660

FACILITY: Cintas Corporation		SRN / ID: P0698
LOCATION: 421 Bayliss Street, MIDLAND		DISTRICT: Bay City
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: Nick Locanto , Production Manager		ACTIVITY DATE: 09/02/2021
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled on-site inspection.		
RESOLVED COMPLAINTS:		

An onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Cintas site located in Midland, MI. Applicable records were requested on August 31, 2021, to verify compliance with permit to install (PTI) No. 81-18. An in-person inspection to verify onsite compliance was later completed on September 2, 2021.

Facility Description

Cintas is an industrial cleaning company and materials cleaned can include bar towels, shop towels, dust mops and mats. The facility is one of several facilities located in Michigan and the Midland, MI site is in operation with PTI No. 81-18. The facility has taken opt out permit limits for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs).

Offsite Compliance Review

- Based on the timing of the inspection, the 2020 Michigan Air Emissions Reporting System (MAERS) Report was submitted on March 5, 2021, and later reviewed. Upon review, errors were noted, however, the 2020 MAERS Report was concluded to be acceptable.

Compliance Evaluation

A request was sent to Mr. Nick Locanto, Production Manager, of Cintas on August 31, 2021, for various records required by PTI No. 81-18. The various records that were received and reviewed will be discussed further in this report. An onsite inspection of the facility was later completed on September 2, 2021. AQD staff AS arrived in the area at 9:42am. Weather conditions at the time were sunny skies, temperatures in the low 60's degrees Fahrenheit and winds from the north at 0-5mph. While offsite, what appeared to be a brief cleaner odor was noted to the east of the site. No odor complaints have been recently received regarding Cintas. Emissions observed appeared to be steam. AS checked in with the front office and met with Mr. Locanto, and Mr. Matt Hayes, Maintenance Supervisor, who provided a tour of the site and answered site specific questions. All records were provided by Mr. Locanto.

As mentioned above, Cintas is an industrial cleaning facility. Items are received onsite through trucking. Items are then sorted before going through the various cleaning, drying and other onsite processes before being shipped back to their respective customers.

PTI No. 81-18

FGFACILITY

This flexible group is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

This flexible group is subject to a VOC emission limit of less than 89.9 tons per year (tpy) per a 12-month rolling time period as determined at the end of each calendar month. Records were requested and reviewed for select time periods. For the month of July 2021, 0.12 tons of VOCs were emitted. As of July 2021, 2.08 tpy of VOCs were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit.

This flexible group is subject to individual / aggregate HAP emission limits of less than 8.9 tpy and less than 22.4 tpy respectively. Records were requested and reviewed for select time periods. For the month of July 2021, 0.008 tons of aggregate HAPs were emitted. As of July 2021, 0.18 tons of aggregate HAPs were emitted per a 12-month rolling time period which is well within the permitted limits for both individual and aggregate HAPs. Previous 12-month rolling time periods reviewed were also within the permitted limits.

This flexible group is subject to a material limit for soiled shop towels processed of 22,000,000 pounds year per a 12-month rolling time period as determined at the end of each calendar month. Records were requested and reviewed for select time periods. For the month of July 2021, 11,200 lbs of soiled shop towels were processed. As of July 2021, 264,600 lbs of soiled shop towels were processed which is well within the permitted material limit. Previous 12-month rolling time periods reviewed were also within the permitted material limit. This flexible group is subject to a second material limit for all laundered textiles processed of 72,000,000 pounds per year per a 12-month rolling time period as determined at the end of each calendar month. Records were requested and reviewed for select time periods. For the month of July 2021, 523,490 lbs of total textiles were processed. As of July 2021, 7,617,930 lbs of total textiles were processed per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted material limit.

Per Special Condition (SC) VI.2, the permittee shall keep monthly / 12-month rolling time period records of soiled shop towels and all textiles processed. Based on the records provided this appears to be being followed.

Per SC VI.3, the permittee shall monitor and record the types of fuel burned and the amount of each type of fuel burned for FGFACILITY on a monthly basis. Based on the records provided, it appears that only natural gas is used, and records appear to be being kept in a satisfactory manner.

Per SC VI.4-5, the permittee shall keep monthly / 12-month rolling time period records of VOC and individual / aggregate HAP emissions for FGFACILITY. Based on the records reviewed, this appears to be being completed.

Onsite Observations / Additional Recordkeeping

Onsite processes were observed during the course of the site inspection from when materials are brought onsite to the finished products that are shipped offsite.

At the time of the inspection, four dryers were noted consisting of three larger units and one smaller unit. Speaking with Cintas staff, when the three larger units are in operation, lint traps are cleaned up to four times a day depending on downtime. Daily checklists were

located on the unit indicating this was being completed. The smaller unit did not have a daily checklist but after speaking with Cintas staff, it was stated the lint trap is cleaned approximately three times a day and the unit wouldn't run properly if there is excess lint in the trap. After further review, the four dryers appear to be being operated in a satisfactory manner. In 2018, a 278a demonstration was requested for several Cintas facilities located in Michigan by the AQD and later provided. Cintas believed that the dryer units were exempt per Rule 290. Records for the four dryers were provided by Cintas staff. After further review, the records appeared to be satisfactory, and the dryers appear to be exempt per Rule 290.

At the time of the inspection, six washers were noted of varying sizes. While speaking with staff, it appears that in March 2019, one washer had been replaced with a slightly smaller sized unit. The washers were stated by Cintas in the Rule 278a demonstration to be exempt per Rule 291. Demonstrations had been previously provided and it should be noted that the unit was stated to be a slightly smaller unit, thus the potential emissions would appear to be less. The washers appear to be exempt per Rule 291.

The wastewater treatment area was discussed and observed during the inspection. Cintas staff had stated that the wastewater pit screenings are changed twice a day and daily records were observed that appeared to verify this. The wastewater treatment unit was stated by Cintas in the Rule 278a demonstration to be exempt per Rule 285(2)(m). This appears to be acceptable.

One 5.23 MMBtu/hr boiler used for heating purposes was observed during the inspection and Cintas believes is exempt per Rule 282(2)(b)(i). This appears acceptable.

One parts washer was observed in the maintenance area during the inspection. The unit had an air / vapor interface area of less than 10 square feet and appears to be exempt per Rule 281(2)(h).

The rooftop was observed during the inspection. Speaking with Cintas staff, it appears that two separate roof cleaning companies clean the roof on a monthly and quarterly basis respectively. Small amounts of lint were noted in depressions on the rooftop when staff and AS utilized a scissor lift to observe the roof adjacent to the building. After further review, this does not appear to be an issue of concern.

Conclusion

Based on the facility walkthrough, observations made, and records received, Cintas appears to be in compliance with PTI No. 81-18 and applicable air quality rules.

NAME Adam Shaffer

DATE 09/07/2021

SUPERVISOR Chris Hare