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March 6, 2017

Kerry Kelly, Environmental Quality Analyst  
Air Quality Division  
Southeast Michigan District Office  
Department of Environmental Quality  
State of Michigan  
27700 Donald Court  
Warren, MI 48092-2793



Re: Violation Notice, SRN: P0758

Dear Ms. Kelly:

UniFirst Corporation is in receipt of the above-referenced Violation Notice (Notice) that was sent to Mr. Earl Harris, former General Manager of UniFirst's Pontiac, Michigan laundry. Mr. Kevin Smith is the new General Manager of the location. This response to the Notice has been prepared by me, with assistance from my consultant, Peter Anderson, as we are most familiar with the plant's process equipment and operating history.

As you requested, I am providing responses within 21 calendar days to the questions posed in the Notice, including the duration of the alleged violations, how UniFirst first became aware of them, and the compliance measures that UniFirst has implemented to address them.

#### **Boiler MACT Requirements**

As stated in the Notice, UniFirst submitted a Permit to Install (PTI) to the Department's Air Quality Division (AQD) Permit Section on October 12, 2016 for its facility located at 1300 Auburn Road, Pontiac Michigan. As stated in the application, in the course of its own voluntary compliance evaluation, UniFirst determined that the plant may be considered to be a major source of emissions of the Hazardous Air Pollutant (HAP) tetrachloroethylene, based on theoretical potential to emit levels. UniFirst immediately submitted an Initial Notification Report to the Department of Environmental Quality (DEQ) documenting UniFirst's determination.

Based on a detailed analysis of HAP emissions from equipment available in the Pontiac laundry facility, and contrary to the inference drawn by the DEQ in its Notice, UniFirst has not been a major source of HAP emissions since commencing operations in November 2001. The table below summarizes UniFirst's Potential to Emit (PTE)

HAP emissions since the commencement of operations, based on dates of equipment additions to the plant. The calculations are based on the capacity of the washers and dryers available for use, and the emission factors for HAP (the highest of which is tetrachloroethylene) derived from emissions testing performed by UniFirst.

The calculations indicate that the Pontiac plant was not a major source for tetrachloroethylene until the installation of a fourth dryer in 2014 caused the theoretical potential to emit this HAP to exceed 10 tons per year (tpy).

<b>Potential Process Emissions (tpy)</b>			
Year	Max Pounds of Soiled Shop Towels that could be Laundered	Total HAP	Tetrachloroethylene
2000-2001	16,016,000	12.0	6.4
2005	17,290,000	13.0	6.9
2011	18,473,000	13.9	7.4
2014	28,301,000	21.2	11.3
	<b>Major threshold</b>	<b>25</b>	<b>10</b>
<b>Potential Fuel Combustion Emissions (tpy)</b>			
Year	MMCF/YR	HAP	
2017	206.4	0.19	

In addition, and equally important to recognize, actual HAP emissions from the plant in fact have been very low, well below major source thresholds. The table below presents a summary of actual annual plantwide HAP emissions since 2010.

<b>Actual Process Emissions (tpy)</b>			
Year	Soiled Shop Towels Laundered	Total HAP	Tetrachloroethylene (tpy)
2010	280,052	0.2	0.1
2011	393,343	0.3	0.2
2012	413,364	0.3	0.2
2013	437,857	0.3	0.2
2014	495,933	0.4	0.2
2015	462,756	0.3	0.2
2016	497,022	0.4	0.2
<b>Actual Fuel Combustion Emissions (tpy)</b>			
Year	MMCF/YR	HAP (tpy)	
2014 - 2015 Ave	16.6	0.02	
2016	16.11	0.02	

Our corporate standard is to perform two tune-ups annually on our boilers. These activities have been undertaken for the life of the Pontiac boiler and will continue. Future tune-ups will be documented in a manner consistent with 40 CFR 63 Subpart DDDDD. UniFirst has completed the one-time energy assessment, has scheduled a tune-up and soon will complete the initial notification of compliance status (NOCS) certification.

#### **Previous Actions Taken**

UniFirst's actions taken with respect to this matter include the following:

June 26, 2016	Completed boiler tune-up
August 30, 2016	Filed NESHAP Initial Notification Report with DEQ
October 6, 2016	Completed one-time Energy Assessment
October 12, 2016	Applied for Permit to Install to restrict emissions to minor source levels (expect PTI to be issued this month)

#### **Future Actions**

UniFirst plans to perform the following activities:

March 2017	Perform and document annual boiler tune-ups consistent with Subpart DDDDD
March 2017	Complete EPA CDX online NOCS certification
April 15, 2017	Submit Renewable Operating Permit application to DEQ

### **Renewable Operating Permit**

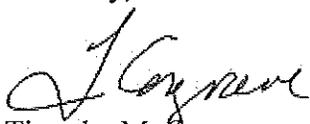
UniFirst is in the process of preparing a ROP application and anticipates that it can be submitted to DEQ in the required timeframe. UniFirst first developed HAP emissions factors based on source testing it conducted in New England for the laundering of soiled shop towels. Following that testing, UniFirst implemented a voluntary compliance evaluation to determine actual and theoretical potential HAP emissions at other facilities, including at the Pontiac plant.

The volume of materials laundered is recorded by our production management systems. As shown in the table above, actual HAP emissions, estimated using available annual shop towel weights along with the Company's emission factors, demonstrate that the actual HAP emissions from the plant have been below 0.5 tpy.

While Potential to Emit (PTE) calculations suggest that UniFirst theoretically could have been a major source of a single HAP from laundering soiled shop towels starting in 2014, that outcome has never been a practical reality. UniFirst's primary business is laundering uniforms and mats. In recent years, soiled shop towels have accounted for only approximately 5% of the products laundered by UniFirst. Unlike some suppliers in the industry, UniFirst has never focused on selling shop towel services and treats them only as ancillary products to our uniform rental business.

Should you have any questions, please contact me at 978-527-4332.

Sincerely,



Timothy M. Cosgrave  
Director  
Environmental, Health & Safety

cc: Kevin Smith