



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

February 14, 2017

Mr. Earl Harris, General Manager
UniFirst Corporation
1300 Auburn Road
Pontiac, MI 48342

SRN: P0758, Oakland County

Dear Mr. Harris:

VIOLATION NOTICE

On October 12, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) Permit Section received a Permit to Install (PTI) application (PTI application number 166-16) from UniFirst Corporation located at 1300 Auburn Road, Pontiac, Michigan. PTI application 166-16 was prepared by Sea Rivers Consulting. It is stated in the Regulatory Applicability Review section of PTI application 166-16; "Because the plant is presently considered to be a major source of HAP emissions based on theoretical potential to emit levels, the boiler is subject to maximum achievable control technology (MACT) requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) at 40 CFR 63, Subpart DDDDD." HAP emission factors, based on UniFirst's Portland, Maine Test Report dated February 15, 2013, were also included in PTI application 166-16. AQD permit staff calculated facility-wide individual and aggregate HAP potential to emit using the emission factors provided in PTI application 166-16. The AQD calculations confirmed UniFirst, in Pontiac, Michigan, is a major source of HAPs. The compliance date for 40 CFR 63, Subpart DDDDD was January 31, 2016. As a result, UniFirst Corporation located in Pontiac, Michigan is in violation of 40 CFR 63, Subpart DDDDD requirements. Specific violations of 40 CFR 63, Subpart DDDDD are listed in the table below:

Process Description	Rule Violated	Comments
Hurst 10,500,000 Btu/hr natural gas-fired boiler	40 CFR 63 Subpart DDDDD	All applicable requirements in 40 CFR 63 Subpart DDDDD
Hurst 10,500,000 Btu/hr natural gas-fired boiler	40 CFR 63.9(h)(2)(ii)	Failure to submit initial compliance notification
Hurst 10,500,000 Btu/hr natural gas-fired boiler	40 CFR 63.7545(e)	Failure to submit initial compliance notification

Furthermore, under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(4) of

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Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the Department of Environmental Quality (DEQ), Air Quality Division (AQD) not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

Based on the commencement of operation of UniFirst Corporation located at 1300 Auburn Road, Pontiac, Michigan, an application for a ROP should have been submitted to the AQD by November 2001. To date, the AQD has not received this application. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(4) of Act 451, this facility has failed to obtain an "application shield." Please submit a complete application within (60) days from the date of this letter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 7, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If UniFirst Corporation 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 violations. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kerry Kelly
Environmental Quality Analyst
Air Quality Division
586-753-3746

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Joyce Zhu, DEQ