



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Cintas Corporation, Green Bay, WI

FROM: Valeria Apolinario, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Cintas Corporation

Facility Location: 800 Isbell Street, Green Bay, WI 54303

Date of Inspection: August 15, 2022

EPA Inspector(s):

1. Valeria Apolinario, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

Other Attendees:

1. Justin Tonies, Plant Manager
2. Chad Blohm, General Manager
3. Brittany Nichola, Oneida Nation Inspector

Contact Email Address: blohmc@cintas.com

Purpose of Inspection: The facility is located within the exterior boundaries of the Oneida Tribe of Wisconsin and was issued a Part 49 Minor NSR Permit by U.S. EPA Region V. U.S. EPA conducted a Full Compliance Evaluation of the facility.

Facility Type: Industrial Launderer

Regulations Central to Inspection: The facility's Construction Permit with Synthetic Minor Limits (2020-49WION-001) lists the following requirements:

Emission Limitations and Standards

- Yearly, in tons/years (tpy), NO_x, CO, volatile organic compounds (VOCs), SO₂, PM (including separate limits for PM₁₀ and PM_{2.5}) emission limits based on a 12-month rolling summation.
- 3-hour average PM emission limits for the natural gas-fired Boiler and the natural gas-fired industrial dryers and process vents.
- Yearly, in tpy, single hazardous air pollutant (HAP) and total HAPs emission limit based on a 12-month rolling summation.
- The facility shall not operate the facility to process more than 28,950,000 pounds of soiled shop towels per year based on a 12-month rolling time period as determined at the end of each calendar month.
- The facility shall not dry or heat any soiled shop towels in any dryer unless they have first been washed in a washing machine included in Process P01 or Process P02.
- The Industrial Dryers may only be fired using natural gas.
- The Boiler may only be fired using natural gas.
- Lint filters or other particulate capture systems, installed as part of the equipment design, shall be operated at all times that each process is in operation.
- All emission units and associated equipment authorized by this permit, must be maintained in good working order and operated properly.
- At all times, including start-up, shut-down, and malfunction, the facility shall maintain and operate all sources, including associated air pollution control equipment regulated by this permit in a manner consistent with good air pollution control practices for minimizing emissions.

Monitoring and Testing

- The facility shall develop and follow guidelines and procedures for sorting and categorizing soiled materials to be washed and dried during industrial laundry operations. At minimum, these procedures shall document the method of classifying soiled materials as either soiled shop towels or non-VOC containing items.
- The facility shall develop and follow guidelines and procedures for sorting soiled shop towels to minimize fugitive VOC and HAP emissions in accordance with good work practices. Good work practices include, but are not limited to, storing soiled shop towels in covered containers prior to sorting or washing the towels.
- The facility shall sort, categorize, and weigh laundry by type (shop towel, other);
- The facility shall conduct daily visual inspections of the lint coup to ensure lint filters (screens) are installed and functioning properly;
- The facility shall calculate monthly and 12-month rolling emissions of VOCs and HAPs with equations stated in the permit.
- The facility shall calculate monthly and 12-month rolling emissions of NO_x, SO₂, CO, PM, PM₁₀ and PM_{2.5} from combustion units using AP-42 emission factors.
- The facility shall calculate monthly and 12-month rolling emissions of NO_x, CO, SO₂, PM, PM₁₀ and PM_{2.5} from combustion units using AP-42 emission factors.

Recordkeeping and Reporting

- The facility shall maintain a file of all records required by this permit. The permittee shall retain all records required in this permit for at least 5 years.
- The facility shall retain records of all calibration and maintenance records, and copies of all reports required by the permit. The facility shall also maintain the following records of the monitoring required by the permit:
 - Total weight of soiled towels processed by the facility per month sorted by category (shop towels, other) in 1,000 pounds;
 - Amount of natural gas used by the facility each month;
 - Total emissions of each individual Federal HAP emitted during each month, in tons;
 - Total emissions of each individual Federal HAP emitted during the previous 12 consecutive months, in tons;
 - Total emissions of all Federal HAPs combined emitted during each month, in tons;
 - Total emissions of all Federal HAPs combined emitted during the previous 12 consecutive months, in tons;
 - Total emissions of NO_x, CO, SO₂, Lead, PM, PM₁₀, and PM_{2.5} emitted during each month and the previous 12 consecutive months.
 - Documentation of the source and development of any Federal HAP emission factor used; and
 - Daily records of visual inspection of the lint coup and note the date when the lint coup collection fabric is replaced.
- The facility shall promptly report to EPA any deviation from any permit requirements, including those attributable to upset conditions, the probable cause of such deviation, and any corrective actions or preventative measures taken.
- The facility shall submit an annual report of all required monitoring to assure compliance with the synthetic minor limits established in this permit. This report must include confirmation that the synthetic minor limit was maintained for the previous 12 months and must clearly list all instances of deviations from the permit requirements.

Arrival Time: 1:04 pm

Departure Time: 2:18 pm

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet — via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Justin Tonies and Chad Blohm unless otherwise noted.

Company Ownership: There has been no change in ownership since March 2017, when Cintas Corporation acquired the previous facility operator G & K Services.

Process Description:

Cintas Corporation (Cintas) operates an industrial laundry facility. The facility's permit states that the facility operates nine washers, four of which vent to stacks while the other five vent indoors. The facility also operates six dryers. Cintas washes and dries industrial garments, mats, towels, and other industrial products. Laundry is separated by garments including uniforms, aprons, lab coats, as well as bulk products including rubber mats, terry cloths, and towels. Soil level ranges from no/light soil to heavily soiled items with grease, paints, or oil. Several customers of Cintas pre-sort the items, however, Cintas also performs sorting prior to weighing the amount of items received.

Garments and bulk items are sorted by color, material blend, and type. Each product classification has a specific wash formula. The items are washed and processed through either the dryers or the steam tunnel before being returned to the customers. The entire laundering process typically takes one week.

Staff Interview:

- A washer was replaced with the same model in March 2021 and a dryer was upgraded to a more energy efficiency efficient model in late 2021.
- Natural gas is used for process heat in the dryers and the steam tunnels.
- Solvent towels are sent to a third-party to be processed once per week; solvent towels make up less than 5% of the items received by Cintas.
- Colored laundry tote slings are used to store soiled products for every load, with each color being assigned a specific product.
- Cintas tracks the amount of soiled products the facility receives, in pounds.
- Lint filters from the dryer are cleaned and replaced once every six months.
- The steam tunnel lint filter is checked daily while the dryer lint filters are checked weekly.
- The steam tunnel lint filter is located at the bottom of the steam tunnel. A scraper runs through the whole distance of the steam tunnel, twice per week, to ensure that lint is captured. The lint filter is blown out weekly.
- The dryer and steam tunnel lint filters are pressure washed twice per year.
- The lint collection unit underneath the dryer lint filter is emptied twice a day.
- Emission calculations are outsourced to a corporate environmental engineer; Cintas obtains emission reports from this same source.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The steam tunnel was not running when U.S. EPA arrived as it operates during the first shift only. U.S. EPA examined the facility's boiler and recorded the boiler heat input at 10.46 million British thermal units per hour (MMBtu/hr).

During the tour, the facility explained the use of the lint filters for the dryers. The facility showed one of the lint filters for the dryers, stating that the static pressure of the filter was interlocked with the dryer operation and too low of a static pressure value would immediately shut off the dryer. U.S. EPA examined the lint collection unit for this dryer and observed lint in it. The facility stated that all lint collection units are emptied twice per day.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

As a part of the Full Compliance Evaluation, U.S. EPA requested the following documents for four years prior to the inspection:

- Manufacturer's specifications or guidelines for lint filters (screens) for dryers and steam tunnel.
- Daily records of visual inspection of each lint coup for the dryers; Cintas personnel stated that the daily visual inspection records may be summarized or recorded monthly.
- Dates of each lint filter replacement for dryers and the steam tunnel.
- Monthly natural gas fuel usage for the natural gas-fired boiler and the steam tunnel.
- Daily records of visual inspection of the lint filters for the steam tunnel.
- The total weight of soiled print and soiled shop towels processed by the facility per month, sorted by category, in 1,000 pounds, including:
 - The weight and type of soiled shop towels washed in "Process P01" (Industrial Washers listed in the permit as part of Process P01)
 - The weight and type of soiled print and soiled shop towels washed in "Process P02" (Industrial Washers listed in the permit as part of Process P02)
- Allowed weight of soiled shop towels that may be processed during each 12-consecutive month period, based upon the weight of soiled print towels processed, and supporting calculations
- Monthly VOC, toluene, tetrachloroethane, and total HAP emissions, in tons;
- 12-month rolling sum of VOC, toluene, tetrachloroethane, and total HAP emissions, in tons;

- All documentation of the source and development of any emission factors used.
- Guidelines and procedures for sorting and categorizing soiled materials at the facility
- Record of any instances when towel identification and sorting procedure was not followed, and any steps taken to ensure the towels are identified and sorted according to established guidelines and procedures after the event.

Concerns: U.S. EPA inspectors stated concerns that the lint ‘coup’ for the dryers was only inspected weekly rather than daily. Cintas personnel clarified that the lint filters are inspected weekly, but the lint coup, which is the lint collection unit at the bottom of the lint traps, is emptied twice per day.

DIGITAL SIGNATURES

Report Author: **VALERIA APOLINARIO**  Digitally signed by VALERIA APOLINARIO
Date: 2022.10.13 09:15:05 -05'00'

Section Supervisor: **Brian Dickens**  Digitally signed by Brian Dickens
Date: 2022.10.13 15:55:35 -05'00'