



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 1, 2009

**RE: CINTAS
3DP00039*AP
STRONGSVILLE
CUYAHOGA COUNTY**

Doug Horvat, Manager
CINTAS Corporation
8221 Dow Circle East
Strongsville, Ohio 44136

Dear Mr. Horvat:

On June 29, 2009 this writer conducted a compliance evaluation inspection of your facility. You represented CINTAS during the inspection. The visit consisted of a premeeting, NPDES Permit compliance review, and a physical inspection of the plant and wastewater pretreatment. The following represents a summary of the visit:

General

CINTAS is located at 8221 Dow Circle East, City of Strongsville, Cuyahoga County. CINTAS provides and cleans uniforms, floor mats, shop towels, and other miscellaneous textile products to industrial, commercial, and public operations. Sanitary and pretreated process wastewater is discharged to the sanitary sewers tributary to the City of Strongsville "C" WWTP. CINTAS maintains NPDES permit 3DP00039*AP which will expire on December 31, 2010. Sanitary wastewater is discharged to the Strongsville sanitary sewers. Process and potable water is supplied by city water. There are no on-site groundwater wells.

Process Wastewater Produced

- Washwater from 8 full size washers and two smaller (pony) washers located in the "wash alley"
- Boiler blowdown
- Softener regeneration water

Process Wastewater Treatment

CINTAS has applied for and has been issued two Permit to Install for the installation of pretreatment facilities. The first PTI # 02-12267 was issued on January 28, 1999, the second PTI # 02-18584 was issued on November 19, 2003.

Process wastewater treatment present during the inspection consisted of the following:

- Wastewater from the washers is collected in a floor trench behind the units which flows into Pit #1. Pit #1 contains a mixer to homogenize the water before being pumped to the shaker screen used to remove lint from the water. Water then drains by gravity into Pit #2 from where it is pumped to a heat reclaimer and then to a 30,000 gallon above ground equalization tank. pH is monitored on the influent to this tank. Wastewater is then pumped to inline mixers where Bentonite, flocculants, and coagulants are added prior to entering the DAF unit. On the discharge side of the DAF unit defoamer and a small amount of chlorine is added, for odor control. Effluent is collected in an above ground 750 gallon "recycle water" tank. Treated water is then pumped to another above ground 30,000 gallon tank to be reused in the cleaning operations. If this tank is full, the water from the "recycle tank" is discharged to the sanitary sewers.
- A plate and frame filter press is used to dewater the DAF skimmings.
- Pit #1 also receives boiler blowdown and softener regeneration wastewater.
- Wastewater treated on a daily basis is generally 60 to 70,000 gpd.
- Approximately 40% of the water treated is recycled. More in the winter and less in the summer.

Compliance History

A review of your compliance history for the time period of January 1, 2006 thru May 2009 indicated the following violations:

Numeric Violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Zinc, Total Recoverabl	1D Conc	1000	1120.	7/13/2006
001	Zinc, Total Recoverabl	1D Conc	1000	3150.	8/16/2006
001	Zinc, Total Recoverabl	1D Conc	1000	1110.	11/6/2006
001	Zinc, Total Recoverabl	1D Conc	1000	2000.	1/17/2006
001	Zinc, Total Recoverabl	1D Conc	1000	1510.	3/8/2006
001	Mercury, Total Recover	1D Conc	1	4.	11/20/2007
001	pH, Maximum	1D Conc	11.0	11.65	11/6/2008

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	Mercury, Total Recover	1/2months	1	0	01/01/2007
001	Mercury, Total Recover	1/2months	1	0	03/01/2007
001	Total Suspended Solids	1/2months	1	0	04/01/2007

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001	Nitrogen, Ammonia (NH3	1/2months	1	0	04/01/2007
001	Oil and Grease, Freon	1/2months	1	0	04/01/2007
001	Nickel, Total Recovers	1/2months	1	0	04/01/2007
001	Cadmium, Total Recover	1/2months	1	0	04/01/2007
001	Lead, Total Recoverabl	1/2months	1	0	04/01/2007
001	Chromium, Total Recove	1/2months	1	0	04/01/2007
001	Copper, Total Recovers	1/2months	1	0	04/01/2007
001	pH, Maximum	1/2months	1	0	04/01/2007
001	pH, Minimum	1/2months	1	0	04/01/2007
001	Mercury, Total Recover	1/2months	1	0	04/01/2007
001	Biochemical Oxygen Dem	1/2months	1	0	04/01/2007
001	Chemical Oxygen Demand	1/2months	1	0	04/01/2007
001	Flow Rate	1/2months	1	0	04/01/2007
001	Chloride, Total	1/2months	1	0	04/01/2007
001	Methyl Blue Active Sub	1/2months	1	0	04/01/2007
001	Phosphate, Total (PO4)	1/2months	1	0	04/01/2007
001	Cyanide, Free	1/2months	1	0	04/01/2007
001	Total Suspended Solids	1/2months	1	0	12/01/2007
001	Nitrogen, Ammonia (NH3	1/2months	1	0	12/01/2007
001	Oil and Grease, Freon	1/2months	1	0	12/01/2007
001	Nickel, Total Recovers	1/2months	1	0	12/01/2007
001	Zinc, Total Recoverabl	1/2months	1	0	12/01/2007
001	Cadmium, Total Recover	1/2months	1	0	12/01/2007
001	Lead, Total Recoverabl	1/2months	1	0	12/01/2007
001	Chromium, Total Recove	1/2months	1	0	12/01/2007
001	Copper, Total Recovers	1/2months	1	0	12/01/2007
001	pH, Maximum	1/2months	1	0	12/01/2007
001	pH, Minimum	1/2months	1	0	12/01/2007
001	Biochemical Oxygen Dem	1/2months	1	0	12/01/2007
001	Chemical Oxygen Demand	1/2months	1	0	12/01/2007
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001	Chloride, Total	1/2months	1	0	12/01/2007
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001	Phosphate, Total (PO4)	1/2months	1	0	12/01/2007
001	Cyanide, Free	1/2months	1	0	12/01/2007
001	Total Suspended Solids	1/2months	1	0	01/01/2008
001	Nitrogen, Ammonia (NH3	1/2months	1	0	01/01/2008
001	Oil and Grease, Freon	1/2months	1	0	01/01/2008
001	Nickel, Total Recovers	1/2months	1	0	01/01/2008
001	Zinc, Total Recoverabl	1/2months	1	0	01/01/2008
001	Cadmium, Total Recover	1/2months	1	0	01/01/2008
001	Lead, Total Recoverabl	1/2months	1	0	01/01/2008
001	Chromium, Total Recove	1/2months	1	0	01/01/2008
001	Copper, Total Recovers	1/2months	1	0	01/01/2008
001	pH, Maximum	1/2months	1	0	01/01/2008

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001	pH, Minimum	1/2months	1	0	01/01/2008
001	Mercury, Total Recover	1/2months	1	0	01/01/2008
001	Biochemical Oxygen Dem	1/2months	1	0	01/01/2008
001	Chemical Oxygen Demand	1/2months	1	0	01/01/2008
001	Flow Rate	1/2months	1	0	01/01/2008
001	Chloride, Total	1/2months	1	0	01/01/2008
001	Methyl Blue Active Sub	1/2months	1	0	01/01/2008
001	Phosphate, Total (PO4)	1/2months	1	0	01/01/2008
001	Cyanide, Free	1/2months	1	0	01/01/2008
001	Total Suspended Solids	1/2months	1	0	03/01/2008
001	Nitrogen, Ammonia (NH3)	1/2months	1	0	03/01/2008
001	Oil and Grease, Freon	1/2months	1	0	03/01/2008
001	Nickel, Total Recovers	1/2months	1	0	03/01/2008
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001	pH, Maximum	1/2months	1	0	03/01/2008
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001	Phosphate, Total (PO4)	1/2months	1	0	03/01/2008
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001	pH, Maximum	1/2months	1	0	05/01/2008
001	pH, Minimum	1/2months	1	0	05/01/2008
001	Mercury, Total Recover	1/2months	1	0	05/01/2008
001	Biochemical Oxygen Dem	1/2months	1	0	05/01/2008
001	Chemical Oxygen Demand	1/2months	1	0	05/01/2008
001	Flow Rate	1/2months	1	0	05/01/2008
001	Chloride, Total	1/2months	1	0	05/01/2008
001	Methyl Blue Active Sub	1/2months	1	0	05/01/2008

001	Phosphate, Total (PO4)	1/2months	1	0	05/01/2008
001	Cyanide, Free	1/2months	1	0	05/01/2008

Inspection Observations

- The pre-treatment plant appears to be well maintained and operated by CINTAS personnel, James Bell and Dan Hines. All equipment was in operation and the operators had a good working knowledge of the system.
- During the inspection a trench drain (running the length of the south wall just inside the building) was noticed that led to an oil/water separator just outside the southwest corner of the building. A review of your file later determined that a truck wash station located at the SE corner of the building is tributary to this trench drain.
- When looking for the manhole where sampling for the permit occurs, we observed three manholes within about 20 feet of each other. It was not known which manhole is used for sampling.
- A 20 yard roll off box used to store the DAF sludge is located on the east side of the facility and is tarped at all times to prevent rain water from entering.
- Located outside the south wall of the facility near a dumpster storing wood pallets, we observed a storm drain which contained a 12 to 14 inch pipe that appeared to be emanating from the building. It was not known where this pipe began.
- There is no flow meter on the discharge from the pretreatment system.
- Composite samples are time not flow weighted.
- Precision Analytical performs the sampling and analysis required by the NPDES permit.

Action Items

- 1) Please address the above listed numeric violations and provide an explanation as to why they occurred and the steps taken to correct them. After reviewing the frequency violations back at the office, it appears that the data was not generated and submitted. If after review you determine that the data was generated and submitted, please re-submit it to correct the record. If the frequency violations are accurate, then procedures must be put in place to ensure this does not happen again.
- 2) A review of the Permit to Install (PTI) file indicated that some of the treatment components approved under the last PTI may not have been installed or have been removed. pH probes and controllers listed in the PTI application were not observed. Also, the application lists an Emco deep bed filtration unit to receive water from Pit #1. The shaker screen observed does not appear to be a deep bed filtration unit. Please verify.
- 3) Verify whether or not the oil/water separator is connected to the sanitary sewer.

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- 4) Provide a piping layout for the facility which shows the location of the sanitary sewers, storm sewers and the exact location for your permit sampling point.
- 5) A flow meter must be installed on the discharge from the pretreatment system.
- 6) Submit a summary of the sampling procedures used by Precision Analytical to sample your discharge to the sanitary sewer. Include sample methods, containers used, holding times, preservation techniques, chain of custody (if pertinent), and analytical methods used.

The above listed items must be adequately addressed in writing to this office no later than August 1, 2009, except for the flow meter. The flow meter will require a PTI from this agency to install. We request that you submit the PTI Application no later than August 21, 2009. If you should have any questions or any of the above observations are inaccurate, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/cl

cc: Richard Meloy, City of Strongsville "C" WWTP

File: Pretreatment