



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

March 9, 2011

RE: 3DP00039\*AP  
CINTAS STRONGSVILLE PLANT  
INDUSTRIAL USER INSPECTION  
STRONGSVILLE  
CUYAHOGA COUNTY

Mr. John Miller  
Cintas Corporation  
8221 Dow Circle  
Strongsville, OH 44136

Dear Mr. Miller:

On February 22, 2011, representatives of this office conducted an Industrial User Inspection of the above facility. The Ohio EPA was represented by Donna Kniss, Ryan Laake, Tim Fulks, and John Schmidt. Doug Horvat and you represented the company. Cintas discharges waste water to the City of Strongsville WWTP and has been issued Indirect Discharge (IDP) permit 3DP00039\*AP. The purpose of the inspection was to evaluate compliance with the existing IDP and collect information for the IDP renewal.

Cintas Strongsville currently employs approximately 160 people in a 5 day/week, 3 shift/day schedule, without extended shutdown periods. The facility is a commercial laundry, washing and drying uniforms, aprons, floor mats, and shop towels. There are no dry cleaning operations.

Water from the washers is discharged through a shaker screen and a heat reclaimer, and then routed to the 30,000 gallon equalization tank. Wastewater from the truck wash, air dryer, boiler blowdown, and softener backwash are also routed to this tank. Excess water is routed to the dissolved air flotation (DAF) treatment system. The DAF contains a serpentine tubing section where treatment chemicals are injected with air, and a clarifier section where solids float to the top and are removed. The treated wastewater is pumped to the 33,000 gallon recycle tank to be reused in washing operations. Excess water is discharged through a totalizing flowmeter with a continuous turbidity meter and into the sanitary sewer.

Solids are removed from the shaker screen by paddles that push them into a barrel. The barrel is then emptied into the dumpster that receives the treatment system solids. The sludge is dewatered in a plate and frame filter press and placed in the same dumpster, which is covered with tarps when not in use. Wastes are taken by Allied Waste to a licensed disposal facility; a TCLP test is conducted annually.

There are two dedicated operators for the DAF system. There is a pH probe located in the storage tank with a readout in the DAF area. The pH probe is cleaned and calibrated by the maintenance department. We discussed the requirement for maintaining records of pH probe cleaning and calibrations.

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Samples are collected by Precision Analytical, which also conducts the analyses. The sample location has been moved to inside the DAF area where the flowmeter has been installed in order to collect a flow proportional sample. The sample is only process water that is being routed to the sanitary sewer. The sampling location will be changed in the NPDES permit renewal. A review of the analytical reports showed that 40 CFR 136 methods are being used, and the chain-of-custody forms are generally complete. Precision Analytical also provides a laboratory check-in sheet, some of which indicated that the sample was warmer than 6° C, which can significantly impact CBOD<sub>5</sub> and COD results. It appeared that the problems have been resolved, but we indicated that Cintas should examine the forms to ensure that future samples are kept cool.

A review of the discharge monitoring data from January 2006 to December 2010 showed results were generally satisfactory, with a few results that may be reporting errors. There were permit limit violations for copper and zinc in September 2010. Cintas notified this office of these violations, in accordance with the IDP requirements. This office also noted that higher than normal concentrations of total suspended solids, oil and grease, and chemical oxygen demand occurred when these violations occurred, suggesting operational issues. Cintas was provided with a copy of the data that was discussed.

A specific response to this letter is not required because there are no outstanding issues. If you have any questions or comments, please contact me at (330) 963-1285. I can also be reached via e-mail at [donna.kniss@epa.state.oh.us](mailto:donna.kniss@epa.state.oh.us).

Sincerely,



Donna J. Kniss  
Environmental Engineer  
Division of Surface Water

DJK/mt

pc: Richard Meloy, AM Water  
Ryan Laake, Ohio EPA, CO, DSW

ec: John Schmidt, Ohio EPA, NEDO, DSW  
Tim Fulks, Ohio EPA, CO, DSW

File: Pretreatment Industrial User/Permit-Compliance

# INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Cintas in Strongsville*

Date of inspection: *2/22/11*

OH Number:

IDP Number:

Facility Representative: *John Miller  
Doug Horvat*

Inspector(s): *Donna Kniss  
Ryan Laake*

## COMPLIANCE

1. Date of last pretreatment inspection: *6/29/09*
2. Has the facility been in compliance with its permit limits since the last inspection? Y / N  
If no, explain:  
*see notes*
3. Is the facility in compliance with all other requirements? Y / N / NA  
S Y / N / NA  
R Y / N / NA  
C Y / N / NA  
S Y / N / NA  
A Y / N / NA  
If
- 

**John Miller**  
General Manager

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Y / N / NA

Y / N / NA
4.  Explain any unresolved actions: ult of the last inspection? Y / N

## FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees *~160*
6. Shifts/Day: *3 24/5*
7. Production Days/Year: *no shutdown periods*
8. Hours/shift:
9. Any production changes since the last inspection? Y / N  
If yes, explain:  
*switched chemical company for detergents*
10. General facility description and operations:  
*service laundry -  
no dry cleaning operations*

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection?

(Y) / N

If yes, explain:

changed chemical suppliers for detergents

12. Any expansion or production increase expected within the next year?

Y / (N)

If yes, explain:

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

wash water → pit → shaker screen → heat reclaimer →  
30,000 gal EQ tank - → flocculator  
when enough water turn on DAF - EQ tank goes to flocculator  
DAF  
serpentine tubes where injected coag, flocc, clay  
injected with air

14. Was a PTI issued for the treatment system?

(Y) / N

15. Were there any modifications to the treatment system since the previous inspection?

Y / N

If yes, was a PTI obtained?

Y / N

PTI Number:

Date:

16. What is the treatment mode of operation?

Batch / Continuous / Combination

If batch, list the frequency and duration:

see notes

17. Who is responsible for operating the treatment system?

2 dedicated operators

18. How often is the treatment system checked?

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system?

(Y/N)

Explain:

audio is usual

20. Is there an operations and maintenance manual?

(Y/N)

21. Is an inventory of critical spare parts maintained?

(Y/N)

If yes, list:

22. Are there any bypasses in the system?

(Y/N)

If yes, describe the location:

locked & capped

Have bypasses occurred since the last inspection?

(Y/N)

Was the POTW notified?

(Y/N)

23. Are residuals or sludges generated?

(Y/N)

Method of disposal:

pressed to cakes - Allied waste  
do TLP Annually

Frequency and amount of disposal:

Name of hauler/landfill/disposal facility:

Is any sludge generated subject to RCRA regulations?

(Y/N)

If land applying sludge, is there a sludge management plan?

(Y/N)

**PROCESS AND WASTEWATER INFORMATION**

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. wash water					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9. truck wash					
10. air dryer → drain → pit #1					
<b>Total Regulated Process Flow</b>					
<b>Noncontact Cooling</b>	none				
<b>Blowdown boiler</b>	✓ - pit #1	goes to system			
<b>Reverse Osmosis Condensate</b>					
<b>Demineralizer Regeneration</b>	✓ pit #1				
<b>Filter Backwash</b>	none				
<b>Compressor Condensate</b>					
<b>Storm water</b>					
<b>Other Dilute Flows</b>					
<b>Unregulated Flows(provide list)</b>					
<b>Sanitary</b>					
<b>TOTAL FLOW</b>					

shaker screen -  
paddle pushes  
into barrel  
into dumpster

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

**SELF MONITORING**

26. Sample location(s) described in the facility's permit:  
*permit says manhole, now at point in DAF section*
27. Is the facility sampling at the location(s) described in the permit? Y / N  
If no, describe the actual location:  
*see above*
28. Is the location(s) where the facility is sampling representative? Y / N  
If no, indicate a representative location:
29. Is the flow measured or estimated? Measured / Estimated  
*flowmeter & flow proportional samplers*  
If measured, how often is the meter calibrated? *problems with flowmeter*  
If estimated, describe method of estimation:
30. Is pH monitored continuously? Y / N  
If yes, how often is the meter calibrated? *yes in holding tank*  
*pH probe -*
31. Does the facility collect its own samples? Y / N  
If no, specify the sample collector:  
*Precision*
32. Are appropriate sampling procedures followed?  
Monitoring frequencies Y / N  
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N  
Flow proportioned samples Y / N  
Proper preservation techniques Y / N  
Sample holding times Y / N  
Chain-of-custody forms Y / N
33. Are samples analyzed in accordance with 40 CFR 136? Y / N
34. Laboratory conducting analyses:  
*Precision Analytical*

**TOXICS MANAGEMENT**

35. Are any listed toxic organics used in the facility? Y / N  
If yes, identify organics:

36. Does the facility have a current toxic organic management plan(TOMP)? *N/A* Y / N  
If yes, is it being implemented? Y / N

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y / N

38. Does the facility need a spill prevention plan or slug discharge control plan? Y / N  
If yes, does the facility have a written plan? *have a spill prevention plan* Y / N

39. Identify any potential slug load or spill areas:

**REQUIRED FOLLOW-UP ACTIONS**