

July 27, 2020

To: Morgan Bolstad
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155
Phone: 651-757-2209
Email: morgan.bolstad@state.mn.us

Re: Community Members for Environmental Justice (CMEJ) Comments on Cintas Corp Air Permit (Permit Number 05300966-101)

Dear Morgan Bolstad,

Community Members for Environmental Justice (CMEJ) is a community-based organization, committed to addressing the environmental injustices occurring disproportionately in pollution-burdened neighborhoods in the City of Minneapolis. Many of our concerned residents and families live or work directly in the area near where Cintas Minneapolis Industrial is located (2108 Washington Avenue North).

Cintas is located within a heavy industrially zoned corridor, amongst numerous other industrial facilities, Olson Memorial highway and highway I-94. This industrial corridor where Cintas is requesting a permit adjustment is in an environmental justice community - a low-income community of color with multiple sources of industrial pollution generating a legacy of environmental health issues. This disproportionate burden of air pollution in this area has been well documented across departments and jurisdictions including by the Minneapolis Health Department, Minnesota Pollution Control Agency, University of Minnesota, Minnesota Department of Health, and the federal Environmental Protection Agency. The area is an environmental justice neighborhood, as acknowledged by the City of Minneapolis' Green Zones policy, 2040 Comprehensive Plan, and the MPCA's own environmental justice screening methodology.

As studies have shown, the cumulative pollution of particulate matter (PM/PM10/PM2.5), Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs) and other toxic air pollutants, has resulted in increased infant mortality, lung disease, asthma, cancer risk, and other developmental issues for residents surrounding industrial corridors. Environmental pollution drivers of these 'underlying health conditions' are also now linked directly to increased death rates and risk to COVID-19, which is hitting black and brown communities disproportionately harder here in our state of Minnesota.

While it is our understanding that Cintas as a singular facility may appear to be within the bounds of currently legal pollution limits, we urge increased attention to and additional analyses of a facility that contributes to the existing environmental pollution and health burden in this area.

While within its own operations, Cintas may be decreasing its overall facility's emissions, its location warrants more demonstration of how it (and all the sources around it) are meeting ambient air standards. There appears to be analysis of ambient standards for PM10. Where is the analysis for PM2.5 and other ambient air standards? This is important given the continually higher readings at the MPCA's North Minneapolis air monitors. For a permit in a low-income community of color in an industrialized area with high traffic, the following pollutants listed in the permit should all have ambient air analyses - PM, PM10, PM2.5, NOx, CO, SO2,

VOC, Hexane, CO₂, CH₄, N₂O, CO₂e, 1,1,2,2-TCA, Benzene, Ethyl Benzene, Methanol, Toluene, TCE, Xylene, Combined HAPs. Page 49 of the permit support document is missing information about these pollutants entirely.

Also extremely concerning is Cintas' potential for higher emissions of a pollutant, 1,1,2,2-TCA, that has similar toxicity to TCE (that was just banned in the state). However, TCE also appears in Appendix D of the permit as a pollutant. An explanation of why now banned TCE is emitted at all should also be included.

Based on the documentation shared in the public notice, the permit would allow for *increased* emissions from the new units and a *higher* potential to emit across all criteria air pollutants, VOCs, and greenhouse gases.

There is an increase of Volatile Organic Compounds (VOC) emissions of 90 tons per year, with serious local health implications. The greenhouse gas emissions (CO₂e) of the new units are also higher by over 6,000 tons per year, with a total facility potential to emit allowed at over 22,000 tons per year. This is in direct opposition to the State of Minnesota's and City of Minneapolis' climate change goals, and the 2009 determination by the EPA of greenhouse gases as a public health threat.

This permit is listed as non-expiring and does not appear it will ever be evaluated again. This should never be acceptable in environmental justice communities.

We request an evaluation of a broader cumulative impact assessment, to ensure that this facility is not contributing to the disproportionate burden of air pollution and health impacts on black and brown communities in North Minneapolis. Additionally, we request information about the inspections that will take place for this facility and other industrial facilities in the area, including the frequency of those inspections. We require assurance that this will not evolve into a situation similar to Water Gremlin or Northern Metals, where a facility harms a community for years before it is addressed.

We hold MPCA to the principles and strategies outlined in the MPCA's [Environmental Justice Policy](#) and [Environmental Justice Framework](#). Related to permits under review, the MPCA's Environmental Justice Framework states that the agency incorporates the following strategies:

- Identify facility and permit types that warrant additional actions based on the potential for adverse effects. (p7)
- During permitting, identify and evaluate additional measures, beyond meeting established permit limits, to avoid and diminish impacts. (p7)
- Consider more comprehensive risk assessment and cumulative impact analysis. In areas of concern for environmental justice, determine if additional analysis of pollution from multiple sources and the evaluation of non-chemical stressors and community vulnerability will better inform decisions. When lacking the authority or ability to address these impacts, advocate for and work with other government entities to alleviate these stressors. MPCA programs (air permitting, remediation, wastewater permitting, etc.) will identify when and how they support more comprehensive cumulative impact analysis. (p9)

We look forward to working together to protect and improve the environment and human health for all Minnesotans.

Sincerely,

Shalini Gupta and Roxanne O'Brien

on behalf of Community Members for Environmental Justice (CMEJ)

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