

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

G & K Services, Inc.
Attn: Mr. Jonathan Nedved
5995 Opus Parkway, Suite 500
Minnetonka, Minnesota 55343

Application No.: 86050063

I.D. No.: 201030AYL

Applicant's Designation:

Date Received: October 27, 2008

Subject: Industrial Laundering

Date Issued:

Expiration Date:

Location: 5611 – 11th Street, Rockford, Winnebago County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two (2) washers, six (6) dryers, two (2) 10.4 mmbtu/hr natural gas-fired boilers, seventeen (17) heaters and one(1) make-up air unit pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons per year of volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons per year for combination of such HAPs)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
- 2a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.

- b. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 3a. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- b. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 Ill. Adm. Code 216.121.
- 4. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 215.302, 215.303, or 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart G shall only apply to photochemically reactive material.
- 5a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the equipment covered under this permit such that the equipment be kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The 2 boilers and 6 dryers shall only be operated with natural gas as the fuel. The use of any other fuel requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 6a. Emissions and operation of industrial laundering shall not exceed the following limits:

<u>Towel</u>	<u>Throughput</u>		<u>Emission Factor</u> (lb/1000 Lb)	<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Inkers	36	355	258	9.2	91.6
Shops	98	975	4	.4	<u>3.9</u>

Total 95.5

These limits are based on information in the application. Inker emission factor was determined by mass balance, Shop factor by mass balance at similar facility, and throughputs by a plant-wide VOM limit less than 100(tons/year).

- b. Operation and emissions from all combustion equipment combined shall not exceed the following limits:
 - i. Natural Gas Usage: 22 mmscf/month, 220 mmscf/year.
 - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (lbs/mmscf)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84	0.9	9.3
Nitrogen Oxides (NO _x)	100.0	1.1	11.0
Particulate Matter (PM)	7.6	0.08	0.8
Sulfur Dioxide (SO ₂)	0.6	0.007	0.07
Volatile Organic Material (VOM)	5.5	0.06	0.6

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- d. This permit is issued based on negligible emissions of PM from industrial laundering. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hour and 0.44 ton/year.
- e. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 7a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the

purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 7 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 8a. The Permittee shall maintain monthly records of the following items:
- i. Soiled Shop and Inker towels processed (lbs/month and lbs/year, each);
 - ii. Natural gas usage (mmscf/month and mmscf/year); and
 - iii. Monthly and annual CO, NO_x, PM, SO₂, VOM and HAP emissions, with supporting calculations (tons/month and year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

9. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or deviation, and efforts to reduce emissions and future occurrences.
10. The Permittee shall notify the Illinois EPA in writing and obtain any necessary permits prior to any change in equipment, materials or amounts processed at the source.
11. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

If you have any questions on this, please call Randy Solomon at 217/782-2113.

It should be noted that the 8 Washers that use no VOM are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(oo) and (qq).

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:RBS:jws

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the industrial laundering source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 1330 tons of towels a year. The resulting maximum emissions are below the levels (e.g., 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Operation</u>	E M I S S I O N S (Tons/Year)						<u>Single HAP</u>	<u>Total HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>			
Industrial Laundering			0.44		95.5			
Fuel Combustion	<u>9.3</u>	<u>11.0</u>	<u>0.80</u>	<u>0.07</u>	<u>0.60</u>	--	--	
Totals	9.3	11.0	1.24	0.07	96.10	9.0	22.5	

RBS:jws

