

Response to Comments For
G&K Services Inc. – Green Bay
Revised Air Quality Construction Permit
Permit No. SYN-ON-5500900021-2014-02

On July 16, 2015, the U.S. Environmental Protection Agency (EPA) issued for public comment a revision to a draft Air Quality Construction Permit, permit number SYN-ON-5500900021-2014-02, for G&K Services Inc. – Green Bay. The public comment period for the draft permit ended on August 28, 2015. During the public comment period, EPA received comments from the source.

This document provides a summary of the comments received during the public comment period and EPA's response. This document also lists any changes made to the permit or technical support document (TSD).

Comments Submitted By G&K Services, Inc.

Mr. Scott Whitney, on behalf of G&K Services, Inc., submitted three comments during the public comment period. The comments were submitted by email on August 21, 2015.

Comment 1: Removal of the requirement located in Section II:(E)(6)(d)(v). The requirement asks for the throughput of the existing and replacement steam tunnels to be recorded daily in pounds soiled weight. The emissions from the steam tunnels are only from the combustion of natural gas. The emissions calculations for the units use only natural gas as the throughput. Since this requirement is not used to support a limit, operational requirement, or calculation of emissions, it is unnecessary and should be removed from the permit.

EPA's Response to Comment 1: EPA agrees with this comment and will remove the recordkeeping requirement. There is no process or operational restriction for either steam tunnel in the permit that would require recording the throughput of towels through the steam tunnels. The permit still contains a requirement to record the weight of soiled towels processed at the facility which is required to demonstrate compliance with the facility-wide restriction on towels processed at the facility.

Comment 2: Addition of language to define the shakedown operation mentioned in Section II:(E)(6)(d). I request that the definition read as, "The Shakedown Operation is the time from the initial startup of the new steam tunnel until one of the steam tunnels is decommissioned." This will link the submittals required in Section II:(E)(6)(d) to an event making it easier for G&K to know when to send them.

EPA's Response to Comment 2: EPA agrees with this comment and will add language to permit condition II:(E)(6)(d)(ii) clarifying what is meant by "shakedown operation". This clarification will minimize confusion regarding recordkeeping, notification, and reporting requirements in the permit.

Comment 3: Modification of the requirements located in Section II:(E)(6)(d)(iii) and Section II:(E)(6)(d)(iv). The requirements call for the recording of the hours of operation that the steam tunnels operate either at the same time or individually. These requirements act as monitoring for the 6 hours of concurrent operation per day limit applied to the steam tunnels. This limit is only relevant so long as there are two steam tunnels installed at the facility. Once the shakedown operation ends, one of the steam tunnels will be removed and the need for this record keeping will be gone. I request that both conditions have the following language added at the end: "...during the shakedown operation."

EPA's Response to Comment 3: EPA agrees with this comment and will revised conditions II:(E)(6)(d)(iii) and (iv) to clarify that concurrent operation recordkeeping requirements only apply during the shakedown operation. The recordkeeping requirements will end when shakedown operation of the steam tunnels ends.

Changes Made to the Permit Based on Received Comments

The following changes are being incorporated into the final permit and its TSD based on comments received during the public comment period. Where practical, new additions will be indicated here in **bold**, while removals are indicated by ~~strikethrough~~.

1.) Condition II:(E)(6)(d)(ii) has been revised to define shakedown operation. This condition reads as follows:

(d) The Permittee shall maintain the following records:

[...]

(ii) The date that shakedown operations of the replacement steam tunnel is completed. **Shakedown operation of the steam tunnels begins with the initial startup of the new steam tunnel and ends with the decommissioning of either the new or the existing steam tunnel.**

[...]

2.) Conditions II:(E)(6)(d)(iii) and (iv) have been revised to clarify that the recordkeeping requirements apply only during the shakedown operation. The conditions now read as follows:

(d) The Permittee shall maintain the following records:

[...]

(iii) Hours of operation of each steam tunnel on a daily basis **during the shakedown operation.**

- (iv) The number of hours of operation both steam tunnels were operating concurrently, on a daily basis, **during the shakedown operation.**

[...]

3.) Condition II:(E)(6)(d)(v) has been removed from the permit. Subsequent permit conditions have been renumbered. The changes made are as follows:

- (d) The Permittee shall maintain the following records:

[...]

- ~~(v) — The throughput of the existing and replacement steam tunnel on a daily basis, in pounds soiled weight.~~

~~(vi)(v)~~ [...]

~~(vii)(vi)~~ [...]

Other Changes to the Permit and TSD

No other changes were made to the permit.