

Response to Comments For  
G&K Services Inc. – Green Bay  
Air Quality Construction Permit  
Permit No. SYN-ON-5500900021-2014-01

On September 15, 2014, the U.S. Environmental Protection Agency (EPA) issued for public comment a draft Air Quality Construction Permit, permit number SYN-ON-5500900021-2014-01, for G&K Services Inc. – Green Bay. The public comment period for the draft permit ended on October 15, 2014. 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.

The comments in this section were submitted by G&K Services, Inc. G&K Services, Inc., submitted three comments during the public comment period.

Comment 1: Permit, Page 18, Item (D)(1): if possible, we request that the due date for the submittal of the annual monitoring report be extended from January 31<sup>st</sup> to March 1<sup>st</sup> as this time of the year constitutes the traditional federal and state reporting period for a variety of environmental programs.

EPA's Response to Comment 1: Permit condition Section III:(D)(1) establishes the date that monitoring reports are due. 40 C.F.R. § 49.155(a)(5)(i) requires an annual submittal of reports but does not establish a specific date that reports are due. In order to harmonize the due dates of the reports required by this permit with other reporting periods, we have changed permit condition Section III:(D)(1) to allow for the submission of the annual monitoring report by March 1<sup>st</sup> of each year.

Comment 2: Permit TSD, Page 6, Second Paragraph Third Sentence: the relocation of the affected stacks may be from 10 to 25 feet dependent upon the final design specifications for the heat exchangers. We originally indicated a relocation distance of 10 to 15 feet. This distance change will not affect any emissions rates.

EPA's Response to Comment 2: Since the relocation of the stacks will not affect any emissions, G&K Services may move the stacks during this project as needed.

Comment 3: G&K Services submitted a comment by email explaining that each emission unit within the different process groups are referred to by specific designations instead of by name. G&K Services requested that the permit and TSD include the designations that are used by the facility.

EPA’s Response to Comment 3: In order to avoid unnecessary significant changes to existing records and logs, the permit and TSD will be updated to include the facility’s designation for each specific emission unit.

Changes Made to the Draft Permit and TSD Based on 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.) TSD, Section 1.d, Table 1: Added the individual unit equipment designations to the list of emission units at the source for processes P01, P02, and P03. The table now reads as follows:

Emission Unit	<b>EU ID</b>	Process Group	Unit Description	Heat Input MMBTU/hr	<del>Exhaust</del> Stack
Jensen #3	<b>P36</b>	P01	Industrial Washing Machine	N/A	Indoors
Braun #4	<b>P37</b>	P01	Industrial Washing Machine	N/A	Indoors
Ellis Split Pocket #5	<b>P38</b>	P01	Industrial Washing Machine	N/A	Indoors
Ellis Split Pocket #6	<b>P39</b>	P01	Industrial Washing Machine	N/A	Indoors
Unimac #1	<b>P40</b>	P01	Industrial Washing Machine	N/A	Indoors
Jensen #1	<b>P34</b>	P02	Industrial Washing Machine	N/A	S34
Jensen #2	<b>P35</b>	P02	Industrial Washing Machine	N/A	S34
Unimac #2	<b>P25</b>	P02	Industrial Washing Machine	N/A	S34
Unimac #3	<b>P18</b>	P02	Industrial Washing Machine	N/A	S34
Challenge #3	<b>P08</b>	P03	Natural Gas Industrial Dryer	2.75	S08
Challenge #4	<b>P09</b>	P03	Natural Gas Industrial Dryer	2.75	S09
American #1	<b>P30</b>	P03	Natural Gas Industrial Dryer	3.5	S30
American #2	<b>P31</b>	P03	Natural Gas Industrial Dryer	3.5	S31
Cissell #1	<b>P05</b>	P03	Natural Gas Industrial Dryer	0.25	S06
Cissell #2	<b>P06</b>	P03	Natural Gas Industrial Dryer	0.25	S07

Emission Unit	EU ID	Process Group	Unit Description	Heat Input MMBTU/hr	Exhaust Stack
Boiler	<b>B01</b>	B01	Natural Gas Boiler	10.46	S01
Leonard 24-foot Steam Tunnel		Steam Tunnel	Steam Tunnel	0.8	

Table 1: Emission Units at G&K Services

- 2.) TSD, Section 2.a, page 6: Updated Table 3 to indicate the EU ID of the replaced emission units. The new emission units will assume the EU ID of the emission unit it is replacing. Additionally, the paragraph describing the emission unit replacement action now reads as follows:

G&K requested in a separate construction permit application, dated August 15, 2013, a permit to replace one indoor-venting washing machine, three dryers, and the steam tunnel. The authorization to replace the emission units is being included as part of this permitting action. **A replaced unit will have the same EU ID as the unit it is replacing.** Specifically, G&K Services has requested authorization to replace the following emission units with the indicated emission units:

Process Group	Emission Unit to be Replaced	Replacement Emission Unit	EU ID	Replacement Unit Input Capacity (lbs CDW/load)	Replacement Unit Heat Input Rate (MMBTU/hr)
P01	Braun #4	Jensen L-Tron 450 OPT-H	<b>P37</b>	450	N/A
P03	American #1	Jensen DTX 800 Dryer #1	<b>P30</b>	800	2.5
P03	American #2	Jensen DTX 800 Dryer #2	<b>P31</b>	800	2.5
P03	Cissell #1	WashTech DR-80 Dryer	<b>P05</b>	100	0.25
Steam Tunnel	Leonard 24-foot Steam Tunnel or similar unit with a rated capacity up to 3.0 MMBTU/hr	Leonard Automatics VPT24		N/A	3.0

Table 3: Replacement Units Authorized by This Permit

- 3.) TSD, Section 2.a, page 7: Corrected the paragraph discussing the installation of heat exchangers by changing the distance that G&K may relocate the stacks from 10-15 feet to 10-25 feet. The paragraph now reads as follows:

In addition to these new units, G&K Services intends to install a heat recycling system (heat exchanger) on the stacks from each of the large industrial dryers. These stacks are designated as S08, S09, S30, and S31. To accommodate installation of the heat exchanger systems, the stack locations for each dryer may be relocated to within a 10-~~15~~**25** foot radius of the existing location. Operation of the heat exchanger would result in decreased natural gas usage of up to 25% and decreased particulate matter emissions in the form of lint.

- 4.) Permit, Section I:(B), Tables 1-3: Added the EU ID for the emission units in Process P01, Process P02, and Process P03.
- 5.) Permit, Section III:(D)(1): Changed the date that annual monitoring reports are due from January 31<sup>st</sup> to March 1<sup>st</sup>. Section III:(D)(1) of the permit now reads as follows:

The Permittee shall submit reports of monitoring required by this permit annually, by ~~January 31<sup>st</sup>~~**March 1<sup>st</sup>** of the following year, including the type and frequency of monitoring and a summary of results obtained by monitoring. [40 C.F.R. § 49.155(a)(5)(i)]

#### Other Changes to the Permit and TSD

During the public comment period, EPA identified several issues with the permit. The identification and explanation for changes made to the permit and TSD are included, below.

- 1.) Permit, Section II:(F)(3)(a): Added a due date for the submission of the construction notification for added clarity. Permit condition II:(F)(3)(a) now reads as follows:

The Permittee shall inform EPA, in writing, **within 30 days** of **each of** the following:  
[...]

- 2.) Minor typographical and formatting issues were corrected throughout the permit. There were no substantive changes to any permit condition as a result of these changes.