



VIA UPS DELIVERY

June 14, 2013

Michael Langman
Air Permits Section (AR-18J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

RE: Application for a Part 49 Construction Permit and a Part 71 Operation Permit for G & K Services, Inc., Green Bay, Wisconsin

Dear Mr. Langman:

Enclosed please find applications for both a Part 49 Construction Permit and a Part 71 Operation Permit for the G & K Services, Inc. (G & K Services) facility in Green Bay, Wisconsin. These applications are being submitted on the basis that the facility has recently been made aware that it is located within the limits of the Oneida Tribe of Indians of Wisconsin (Oneida) reservation.

Up to this point, the facility has been operating under permits issued by the Wisconsin Department of Natural Resources (WDNR) pursuant to federal authority and G & K Services considers the emission limits contained within those permits to be valid until replaced by the requested Parts 49 and 71 permits. In the past ten years, the WDNR has issued five (5) construction permits and seven (7) operation permits for the facility. With each permit issued to G & K Services, the WDNR has cited its authority to issue the permit, these permits have been submitted to the USEPA for review and comment, and have been issued without USEPA objection. As recently as May 17, 2013, the WDNR issued a revised Operation Permit (405028690-P13) indicating that it has the requisite authority to issue permits to G & K Services for its Green Bay operations. Historical permitting activities are presented in Table 1.

The initial construction and operation permits established the facility as a synthetic minor source for PSD purposes and as a major source under Title V of the Clean Air Act. This status was maintained throughout subsequent permit actions. Current permit conditions limit total Volatile Organic Compound (VOC) emissions to no more than 234 tons per year, and Hazardous Air Pollutant (HAP) emissions to less than 10 tons per year of each HAP and less than 25 tons per year of the combination of all HAPs. Similarly, emission limits and other provisions have been included in each subsequent permit such that the facility has not been subject to New Source Review requirements under the Prevention of Significant Deterioration (PSD) program, and the facility has not been a Major Source of HAP emissions.

A review of annual Air Emission Reports for 1997 to present (the only available years for which data could be found in the state database) indicates that Volatile Organic Compounds (VOC)

were greatest in 2007 at 99.06 tons and the highest emission rate for HAPs occurred in 1998 when 9.59 tons of xylene and less than 3.0 tons of toluene were reported as emitted.

The enclosed applications serve to establish the facility as a synthetic minor source under the PSD rules and fulfill the requirement to apply for a Part 71 Operating Permit.

Table 1. Historical Permitting Activities

Permit Activity	Permit Number	Date of Activity
Initial application for Title V operating permit	405028690-P01	July 22, 1998
Initial Construction Permit issued	00-DCF-137	October 6, 2003
Initial Title V operating permit	00-DCF-137-OP and 405028690-P01	March 25, 2004
4 - Subsequent construction permits applied for and issued	04-DCF-260	June 30, 2005
	07-JJW-251	November 5, 2007
	09-JJW-148	January 4, 2010
	11-JJW-047	May 24, 2011
6 - Revisions to the Operation Permit applied for; 5- Revisions issued	405028690-P02	December 21, 2007
	405028690-P03	Not issued
	405028690-P10	March 16, 2009
	405028690-P11	February 25, 2010
	405028690-P12	July 11, 2011
	405028690-P13	May 17, 2013

G & K Services has maintained emission rates below major source thresholds for HAP emissions and with respect to the PSD regulations in accordance with state issued construction and operation permits. It is our intent to continue to do so. If you have any questions regarding this application, please contact Brian Duffy via phone at (952) 912-5713 or via email at bduffy01@gksservices.com.

Sincerely,
G & K Services, Inc.

Steve Botts
Director of Environmental Management
(952) 912-5765
sbotts@gksservices.com

Enclosures: Part 49 Construction Permit and Part 71 Operation Permit Applications
Photocopy of Fee Filing Form 5900-06 and Check

Cc: Genevieve Damico
Doug Krysiak
Andrew Utrie
Lee Joniaux
Janine Wilson
Gene Bagot
Dennis Reynolds
Brian Duffy



**Application for Construction Permit
Under 40 CFR Part 49**

G & K Services, Inc.
Green Bay, Wisconsin

June 2013



**Application for Construction Permit
Under 40 CFR Part 49**

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June 2013

TRC Environmental Corporation | G & K Services, Inc.

Part 49 Application

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Section 1

Introduction

G & K Services, Inc. (G & K Services) is a commercial/industrial laundry located in Green Bay, Wisconsin, that launders (cleans and reconditions) soiled industrial towels, coveralls, uniforms, etc. for industrial customers. One of the major customers of G & K Services is the printing industry which has a number of operations within Green Bay and surrounding areas. Soiled towels used to clean printing presses, wood finishing operations, or in automotive or other shop areas are sent to G & K Services for cleaning and reconditioning. These soiled towels often contain residual materials, water-based and organic material based inks, cleaning solvents, greases and oils. G & K Services has implemented procedures which prohibit the transportation of soiled towels containing free liquids.

The soiled industrial towels are counted/sorted and reconditioned (laundered) using a conventional industrial (aqueous) washing step and a drying step. It is anticipated that there are VOC emissions from the counting/sorting operations as solvents contained within the soiled towels volatilize when removed from their closed container. These "fugitive" emissions are accounted for in the overall emission factor used by the plant.

The washing process consists of loading soiled textiles into an industrial washer, adding water, detergent, and other cleaning additives. The soiled textiles proceed through a washing stage, wash water draining stage, rinsing stage, and final draining stage. At the washers, volatile organics entering the system (via the original unlaundered soiled textiles or via the washing additives) either remain in the textiles following washing, are dissolved in the aqueous discharges, or are emitted as either stack or indoor fugitive emissions. The washed textiles are then held and/or transferred to an industrial dryer. Volatile organics that remain in the washed textiles are released in the drying step, or remain with the clean dry textiles. Additional fugitive emissions are released at the wastewater pretreatment system as a result of the fraction of organic compounds that remains with the aqueous phase.

Section 2

Emission Sources, Emission Factors

2.1 Emission Sources

The significant emission sources at the G & K Services facility consist of the following:

2.1.1 Boiler B01, Stack S01 – 10.46 MMBtu/hr Natural Gas-fired Boiler

2.1.2 Process P01 – Industrial Washers, Indoor-vented

Industrial Washing Machine (#3)

Industrial Washing Machine (#4)

Industrial Washing Machine (#5)

Industrial Washing Machine (#6)

Industrial Washing Machine (Unimac #1)

2.1.3 Process P02, Stack S34 – Industrial Washers, Stack-vented

Industrial Washing Machine (Unimac #3)

Industrial Washing Machine (Unimac #2)

Industrial Washing Machine (#1)

Industrial Washing Machine (#2)

2.1.4 Process P03 – Industrial Dryers Burning Natural Gas

Stack S06 – Industrial Dryer (Cissell #1), 0.275 MMBtu/hr

Stack S07 – Industrial Dryer (Cissell #2), 0.275 MMBtu/hr

Stack S08 – Industrial Dryer (#3), 2.75 MMBtu/hr

Stack S09 – Industrial Dryer (#4), 2.75 MMBtu/hr

Stack S30 – Industrial Dryer (American #1), 3.5 MMBtu/hr

Stack S31 – Industrial Dryer (American #2), 3.5 MMBtu/hr

In addition to these emission sources there are insignificant emission sources that include a Steam Tunnel that burns natural gas at 0.8 MMBtu/hr and miscellaneous smaller natural gas combustion units such as convenience space heating and water heating that combine for 11.6 MMBtu/hr of natural gas capacity.

2.2 Emission Factors

There are two categories of soiled industrial towel to which the emissions of VOC and HAPs can be attributed: Print Towels (also referred to as “inkers”) and Shop Towels. All other commercial laundry is expected not to contain the residual materials (solvents, greases, oils) that contribute to the VOC and HAP emissions.

The VOC emission factors in Table 2.1 are derived from stack testing conducted at the G & K Manchester, NH facility. The HAP emission factors in Table 2.1 are derived from stack testing conducted at the G & K Manchester, NH, and Minneapolis, MN, facilities. Stack testing performed at the Manchester facility was done under the direction of US EPA Region I. If a pollutant was tested at both facilities, the greatest tested emission rate is listed in Table 2.1. The original stack testing information for VOC emissions was presented "as carbon," and has been converted to "as propane."

Table 2.1: Emission Factors for Soiled Print and Shop Towels

Pollutant	CAS No.	Emission Factors (lb/1,000 lb Soiled) (lb/1,000 lb Soiled Towels)	
		Print Towel Emission Rate	Shop Towel Emission Rate
VOCs	N/A	127	12.0
Federal HAPs	N/A	18.8	4.54
1,2-Dichloroethane	107-06-2	0.01	0.04
Cumene	98-82-8	0.48	0.01
Ethylbenzene	100-41-4	1.88	0.07
Methanol	67-56-1	0.56	0.05
Methyl Isobutyl Ketone	108-10-1	0.24	0.06
Methylene Chloride	75-09-2	0.05	0.01
m-Xylene	108-38-3	2.53	0.355
Naphthalene	91-20-3	0.01	0.01
n-Hexane	110-54-3	0.07	0.005
o-Xylene	95-47-6	1.26	0.07
p-Xylene	106-42-3	2.53	0.355
Tetrachloroethene	127-18-4	0.14	1.75
Toluene	108-88-3	8.78	1.55
Trichloroethene	79-01-6	0.25	0.21
Xylene (mixtures and isomers)	1330-20-7	6.32	0.78

These emission factors are for the entire wash and dry cycle. The emissions can be further broken down into the wash and dry processes for each category as follows:

Table 2.2: Emissions Breakdown for Wash and Dry Cycles

	Wash Cycle	Dry Cycle
Print Towels	95%	5%
Shop Towels	70%	30%

Section 3

Proposed Limitations

The facility currently operates under provisions of Operation Permit No. 405028690-P13, issued by the WDNR on May 17, 2013, which covers the entire facility. Restrictions in this permit limit VOC emissions facility-wide to no more than 39,000 pounds per month, averaged over each consecutive 12-month period (234 tons per year). Additionally, compliance with the permit conditions limits total monthly individual federal HAP emissions to no more than 1,650 pounds per month averaged over each consecutive 12-month period (9.9 tons per year), while the total monthly aggregate of federal HAP emissions may not exceed 4,150 pounds per month, averaged over each consecutive 12-month period (24.9 tons per year). These or very similar restrictions have been in place since the first construction permit was issued to G & K Services.

Initial construction and operation permits established the facility as a synthetic minor source for PSD purposes and as a major source under Title V of the Clean Air Act. This status was maintained throughout subsequent permit actions. Similarly, emission limits and other provisions have been included in each permit such that the facility has not been subject to New Source Review requirements under the Prevention of Significant Deterioration (PSD) program, and the facility has not been a Major Source of HAP emissions.

G & K Services is proposing the same limits on the facility with this permit application package. These limitations would serve to maintain the facility's status as a synthetic minor source for PSD purposes and as a major source under Title V of the Clean Air Act. The HAP limitations would serve to keep the facility a minor source of HAP emissions.

Section 4

Potential Emissions

4.1 Potential Emissions

Potential emissions of criteria pollutants and HAPs are shown in Table 4.1 below. PM, PM₁₀, and PM_{2.5} emissions were estimated based on the limit of 0.1 grain per dry standard cubic foot for each stack as established in 40 CFR 49.125(d)(1) and (3) (corrected to 7% oxygen for combustion stacks). NO_x, SO₂, and CO emissions were estimated based on combustion ratings for the natural gas burning sources. Potential emissions of VOC and HAPs are based on the emission factors provided earlier and are shown with the proposed facility-wide limit of 234 TPY and 24.9 TPY, respectively.

Table 4.1: Potential Emissions, Tons per Year

	PM	PM ₁₀	PM _{2.5}	NO _x	SO ₂	CO	VOC	HAP
B01 - Boiler	4.7	4.7	4.7	7.7	0.0	3.8	0.3	0.0
P01, Washers, Indoor	0.0	0.0	0.0	0.0	0.0	0.0	172.5	24.9**
P02, Washers, Stack	10.0	10.0	10.0	0.0	0.0	0.0	234*	24.9**
P03, Dryers	170.8	170.8	170.8	9.5	0.0	4.7	153.0	24.9**
Insignificant	3.1	3.1	3.1	8.5	0.0	4.2	0.3	0.0
TOTAL	188.6	188.6	188.6	25.7	0.0	12.7	234*	24.9**

*Facility-wide VOC emissions limited to 234 tons per year.

**Facility-wide HAP emissions limited to 24.9 tons per year for total HAPs, 9.9 tons per year for each individual HAP.

4.2 Greenhouse Gas Emissions

Potential greenhouse gas emissions from the combustion of natural are given in Table 4.2 below. These emissions were calculated based on emission factors and global warming potentials provided in 40 CFR 98.

Table 4.2: Potential GHG Emissions, Tons per Year

Natural Gas Source	Capacity (MMBtu/hr)	CO ₂ (TPY)	CH ₄ (TPY)	N ₂ O (TPY)	CO ₂ -e (TPY)
B01 - Boiler	10.46	5,355	0.10	0.01	5,361
P03, Dryers	13.05	6,681	0.13	0.013	6,688
Steam Tunnel	0.80	410	0.008	0.001	410
Misc. Nat. Gas	11.6	5,939	0.11	0.011	5,945
TOTAL	35.91	18,385	0.35	0.03	18,403

4.3 Historic Actual Emissions

In light of the proposed facility-wide limits to VOC and HAPs, a brief review of reported actual emissions from calendar years 1997 through 2012 has been included. Records of emissions were available in annual emission reports submitted by G & K Services to the Wisconsin Department of Natural Resources for these years. VOC emissions were available for all of the years within this span. However, toluene and xylene records are not available for all years. These are historically the two HAPs with the highest emissions. For several of the reporting years in question, HAP emission rates fell below the reporting threshold for annual emissions reporting in the state of Wisconsin (6,000 pounds each for toluene and xylene, significantly lower for many other HAPs). Despite this reporting threshold, specific emission rates were reported in certain year. For other years, emissions below the reporting threshold were not included in the emissions summary. Due to this lack of emissions data, HAP emissions were not readily available for all years.

Based on a review of reported emissions, VOC emissions over this timeframe have ranged from 24.4 tons per year (2001) to 99.1 tons per year (2007) with an average of 56.1 tons per year. The annual emission reports considered along with the known characteristics of the soiled print and shop towels, indicate that total HAP emissions have been substantially less than the proposed limit of 24.9 tons per year. Total HAP emissions were likely highest in 1998 when xylene emissions were reported to be 9.59 tons per year and toluene emissions were below the 3 tons per year reporting threshold.

Table 4.2: Historical Actual Emissions, Tons per Year

Year	VOC (TPY)	Toluene (TPY)	Xylene (TPY)	Total HAPs (TPY)
1997	46.2	< 3	< 3	-
1998	31.9	< 3	9.59	12(est.)
1999	33.8	< 3	< 3	-
2000	31.9	< 3	< 3	-
2001	24.4	< 3	< 3	-
2002	26.0	< 3	< 3	-
2003	25.0	< 3	< 3	-
2004	78.6	0.86	1.34	2.95
2005	84.2	0.93	1.44	3.16
2006	92.2	1.01	1.58	3.46
2007	99.1	1.09	1.70	3.73
2008	53.0	< 3	< 3	-
2009	48.4	< 3	< 3	-
2010	89.1	< 3	< 3	-
2011	76.6	3.14	2.56	7.48
2012	57.1	4.12	2.87	9.20

Section 5

Proposed Permit

G & K Services is proposing the VOC and HAP emission limits that would maintain the facility's status as a synthetic minor source for PSD purposes and as a major source under Title V of the Clean Air Act. The HAP limitations would serve to keep the facility a minor source of HAP emissions. Pursuant to this goal, G & K Services is submitting jointly the application for Construction Permit under 40 CFR Part 49 and the required application for a 40 CFR Part 71 Operation Permit. Part 71 Operation Permit forms are found in Appendix B.

G & K Services has included proposed permit language as part of the Part 49 Construction Permit application. This proposed permit language is found in Appendix A. G & K has included in this proposed permit the facility-wide restrictions on VOC and HAP emissions as discussed previously. The proposed permit also includes compliance demonstration and record-keeping elements.

5.1 New Source Performance Standards Applicability

This source is not subject to New Source Performance Standards (NSPS). The industrial boiler was installed in 1982 and has not been modified or reconstructed since, and therefore is exempt from the NSPS for small industrial, commercial, and institutional boilers (40 CFR Part 60, Subpart Dc). Based on size (and for other reasons), the boiler is not subject to the standards under 40 CFR Part 60, Subparts D, Da or Db.

5.2 National Emission Standards for Hazardous Air Pollutants

This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP). The facility is a minor source with respect to hazardous air pollutants and therefore the boiler is exempt from the major source standard for industrial, commercial, and institutional boilers (40 CFR Part 63, Subpart DDDDD). Additionally, the boiler is only capable of firing natural gas, and therefore is exempt from the area source NESHAP for small industrial, commercial, and institutional boilers (40 CFR Part 63, Subpart JJJJJ).

Appendix A

Proposed Permit Language

AIR POLLUTION CONTROL OPERATION PERMIT

TYPE: Part 71 Source.

Name of Source: G & K Services, Inc.

Street Address: 800 Isbell Street,
Green Bay, Brown County, Wisconsin

Responsible Official, & Title: Mr. Douglas Krysiak, General Manager

PREAMBLE TO OPERATION PERMIT

Stack and Process Index.

Boiler B01, Stack S01 – 10.46 MMBtu Natural Gas Fired Boiler.

Process P01 – Industrial Washers, Indoor-vented

Industrial Washing Machine; (#3)

Industrial Washing Machine; (#4)

Industrial Washing Machine; (#5).

Industrial Washing Machine; (#6) Industrial Washing Machine; (Unimac #1)

Process P02, Stack S34 – Industrial Washers, Stack-vented

Industrial Washing Machine; (Unimac #3)

Industrial Washing Machine; (Unimac #2)

Industrial Washing Machine; (#1)

Industrial Washing Machine; (#2)

Process P03 – Industrial Dryers Burning Natural Gas

B. Stack S06 – Industrial Dryer (Cissell #1); 0.275 MMBtu

Stack S07 – Industrial Dryer (Cissell #2); 0.275 MMBtu

Stack S08 – Industrial Dryer (#3); 2.75 MMBtu

Stack S09 – Industrial Dryer (#4); 2.75 MMBtu

Stack S30 – Industrial Dryer (American #1); 3.5 MMBtu

Stack S31 – Industrial Dryer (American #2); 3.5 MMBtu

Insignificant Emission Units:

Steam Tunnel (0.8 MMBtu/hr Natural Gas)

Continuous Roll Towel Machine

Textile Sorting and counting area

Convenience Space Heating

Convenience Water Heating.

Boiler, Turbine, and HVAC System Maintenance.

Demineralization and Oxygen Scavenging of Water for Boilers.

Fire Control Equipment.
Forktrucks for material transport
Janitorial Activities.
Maintenance of Grounds, Equipment, and Buildings (lawn care, painting, etc.).
Office Activities.
Pollution Control Equipment Maintenance.
Purging of Natural Gas Lines.
Sanitary Sewer and Plumbing Venting.
Wastewater Treatment/Handling System.

Permit Shield. Unless precluded by the Administrator of the US EPA, compliance with all emission limitations in this operation permit is considered to be compliance with all emission limitations established under the federal clean air act, that are applicable to the source if the permit includes the applicable limitation or if the US EPA determines that the emission limitations do not apply. The following emission limitations were reviewed in the analysis and preliminary determination and were determined not to apply to this stationary source:

Applicability of New Source Performance Standards.

This source is not subject to New Source Performance Standards (NSPS). The industrial boiler was installed in 1982 and has not been modified or reconstructed since, and therefore is exempt from the NSPS for small industrial, commercial, and institutional boilers (40 CFR Part 60, Subpart Dc). Based on size (and for other reasons), the boiler is not subject to the standards under 40 CFR Part 60, Subparts D, Da or Db.

Applicability of National Emission Standards for Hazardous Air Pollutants.

This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP). The facility is a minor source with respect to hazardous air pollutants and therefore the boiler is exempt from the major source standard for industrial, commercial, and institutional boilers (40 CFR Part 63, Subpart DDDDD). Additionally, the boiler is only capable of firing natural gas, and therefore is exempt from the area source NESHAP for small industrial, commercial, and institutional boilers (40 CFR Part 63, Subpart JJJJJ).

TERMS:

Soiled print towels (“inkers”) include towels from printers, wood working / finishing facilities and other operations which return VOC laden towels.

Soiled shop towels include towels from automotive shops and other similar operations which return oil / grease laden towels

A. Conditions Applicable to the Entire Facility.

1. Facility-Wide VOC Synthetic Minor Limitations.

a. Limitations:

(1) The total monthly VOC emissions from industrial laundry operations may not exceed 39,000 pounds per month averaged over any 12 consecutive calendar month period. This condition will cap the facility potential to emit to 234 tons of VOC per year.

b. Compliance Demonstration:

(1) The permittee shall use the following equations to calculate VOC emissions from the facility within 30 days following the end of each calendar month:

(a) To calculate monthly VOC emissions, the permittee shall use Equation 1:

$$E_M = \sum_{i=1}^n U_i \times \text{VOC}_{ef} \quad (\text{Equation 1})$$

Where:

E_M is the total monthly VOC emissions from industrial laundry operations, in pounds;

U_i is the total mass of soiled print or shop towels processed by the facility, in 1000 pounds;

VOC_{ef} is the VOC emission factor for soiled towels processed by the facility, in pounds of VOC per 1000 pounds of soiled print towels or soiled shop towels, as applicable (for Print Towels (“Inkers”) $\text{VOC}_{ef} = 127$ pounds of VOC per 1000 pounds of soiled inkers; and for Shop Towels, $\text{VOC}_{ef} = 12$ pounds of VOC per 1000 pounds of soiled shop towels)

n is the total number of categories of soiled materials.

(b) The permittee shall calculate the monthly VOC emissions averaged over each 12 consecutive calendar month period using the following equation:

$$E_T = \sum_{i=1}^{12} E_{Mi} / 12 \quad (\text{Equation 2})$$

Where:

E_T is the total emission of all VOCs combined averaged over the previous 12 consecutive calendar months, in pounds; and

E_{Mi} is the total VOC emissions during the previous 12 consecutive calendar months, in pounds, as calculated using Equation 1.

c. Test Methods, Recordkeeping, and Monitoring:

(1) The facility shall develop guidelines and procedures which categorize the types of materials being laundered and which notes the categories into which the materials should be assigned (e.g. shop towels, print towels (inkers), other fabrics / items containing VOCs, non-VOC containing items).

(2) The permittee shall keep the following records:

(a) The total mass of soiled towels processed by the facility per month sorted by category (printer towels, shop towels, other), in 1000 pounds;

(b) The total mass of VOC emitted during each month, in pounds;

(c) The total monthly mass of VOC emitted, averaged over the previous 12 consecutive months, in pounds; and

(d) Documentation of the source and development of any VOC emission factor used.

2. Federal Hazardous Air Pollutants (Federal HAPs) Limitations.

a. Limitations:

(1) The total monthly individual federal HAP emissions from laundry operations may not exceed 1,650 pounds per month averaged over any 12 consecutive calendar month period.

(2) The total monthly aggregate of federal HAP emissions from laundry operations may not exceed 4,150 pounds per month averaged over any 12 consecutive calendar month period.

b. Compliance Demonstration:

(1) The permittee shall use the following equations to calculate Federal HAP emissions from the facility within 30 days following the end of each month:

(a) To calculate monthly Federal HAP emissions, the permittee shall use Equation 1:

$$E_i = \sum_{i=1}^n U_i \cdot \text{HAP}_{ef} \quad (\text{Equation 1})$$

A. Conditions Applicable to the Entire Facility.

Where:

E_i is the monthly emissions of an individual Federal HAP from industrial laundry operations, in pounds;

U_j is the total mass of soiled print or shop towels processed by the facility, in 1000 pounds; and

HAP_{ef} is the federal HAP emission factor for soiled towels processed by the facility, in pounds of an individual HAP per 1000 pounds of soiled print towels or soiled shop towels, as applicable (see table of HAP EFs below); and

n is the total number of categories of soiled materials.

Pollutant	CAS No.	HAP_{ef} Emission Factors (lb/1,000 lb Soiled Towels)	
		Print Towels (Inkers)	Shop Towels
Federal HAPs	NA	18.8	4.54
1,2-Dichloroethane	107-06-2	0.01	0.04
Cumene	98-82-8	0.48	0.01
Ethylbenzene	100-41-4	1.88	0.07
Methanol	67-56-1	0.56	0.05
Methyl Isobutyl Ketone	108-10-1	0.24	0.06
Methylene Chloride	75-09-2	0.05	0.01
m-Xylene	108-38-3	2.53	0.355
Naphthalene	91-20-3	0.01	0.01
n-Hexane	110-54-3	0.07	0.005
o-Xylene	95-47-6	1.26	0.07
p-Xylene	106-42-3	2.53	0.355
Tetrachloroethene	127-18-4	0.14	1.75
Toluene	108-88-3	8.78	1.55
Trichloroethene	79-01-6	0.25	0.21
Xylene (mixtures and isomers)	1330-20-7	6.32	0.78

(b) To calculate the aggregate of individual monthly Federal HAP emissions, the permittee shall use Equation 2:

$$E_M = \sum_{i=1}^n E_i \quad (\text{Equation 2})$$

Where:

E_M is the monthly aggregate of federal HAP emissions from industrial laundry operations, in pounds;

E_i is the monthly emissions of an individual federal HAP, calculated using Equation 1; and

n is the total number of federal HAPs emitted by the industrial laundry operations.

(c) The permittee shall calculate the monthly emissions of federal HAP averaged over each 12 consecutive calendar month period from the use of federal HAP-containing materials using the following equation:

$$E_T = \sum_{i=1}^{12} E_{Mi} / 12 \quad (\text{Equation 3})$$

Where:

E_T is the total emissions of all federal HAPs or an individual federal HAP averaged over the previous 12 consecutive months, in pounds.

E_{Mi} is the total of all federal HAP emissions or an individual federal HAP during the previous 12 consecutive calendar months, in pounds, as calculated using Equation 1 or 2.

c. Test Methods, Recordkeeping, and Monitoring:

(1) The permittee shall keep the following records:

- The total mass of soiled towels processed by the facility per month sorted by category (printer towels, shop towels, other), in 1000 pounds;
- The total mass of each individual Federal HAP emitted during each month, in pounds;
- The total mass of each individual Federal HAP emitted, averaged over the previous 12 consecutive months, in pounds;
- The total mass of all Federal HAPs combined emitted, averaged over the previous 12 consecutive months, in pounds; and
- Documentation of the source and development of any federal HAP emission factor used.

B. Process P02 – Industrial Washers, Stack-vented	
NOTE: Includes counting / sorting emissions associated with these operations.	
Pollutant: 1. Particulate Matter Emissions	
a. Limitations:	
Particulate matter emissions from each process stack must not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period. (40 CFR 49.125 (d)(3))	
b. Compliance Demonstration:	c. Test Methods, Recordkeeping, and Monitoring:
Emissions are expected to be trivial and therefore, no compliance demonstration procedures are proposed.	(1) <u>Reference Test Method for Particulate Matter Emissions:</u> Whenever compliance emission testing is required, the appropriate US EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or shall be used to demonstrate compliance.
Pollutant: 2. Visible Emissions	
a. Limitations:	
The visible emissions from an air pollution source must not exceed 20% opacity, averaged over any consecutive six-minute period, unless the owner or operator of the air pollution source demonstrates to the Regional Administrator's satisfaction that the presence of uncombined water, such as steam, is the only reason for the failure of an air pollution source to meet the 20% opacity limit. (40 CFR 49.124 (d))	
b. Compliance Demonstration:	c. Test Methods, Recordkeeping, and Monitoring:
Emissions are expected to be trivial and therefore, no compliance demonstration procedures are proposed.	<u>Reference Test Method for Visible Emissions:</u> Whenever compliance emission testing is required US EPA Method 9 shall be used to demonstrate compliance.

C. Process P03 – Industrial Dryers Burning Natural Gas	
Pollutant: 1. Particulate Matter Emissions	
<p>(1) Particulate matter emissions from a combustion source stack (except for wood-fired boilers) must not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot), corrected to seven percent oxygen, during any three-hour period. (40 CFR 49.125 (d)(1))</p> <p>(2) Particulate matter emissions from each dryer vent must not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period. (40 CFR 49.125 (d)(3))</p>	
b. Compliance Demonstration:	c. Test Methods, Recordkeeping, and Monitoring:
<p>(1) Lint filters shall be in line and shall be operated at all times when the process is in operation.</p> <p>(2) These dryers may only be fired using natural gas or other fuels approved in writing in advance.</p>	<p>(1) <u>Reference Test Method for Particulate Matter Emissions:</u> Whenever compliance emission testing is required, the appropriate US EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or shall be used to demonstrate compliance.</p> <p>(2) The facility shall maintain daily records of visual inspection of the lint coup and shall note the date when the lint coup collection fabric is replaced.</p>
Pollutant: 2. Visible Emissions	
<p>a. Limitations: The visible emissions from an air pollution source must not exceed 20% opacity, averaged over any consecutive six-minute period, unless the owner or operator of the air pollution source demonstrates to the Regional Administrator's satisfaction that the presence of uncombined water, such as steam, is the only reason for the failure of an air pollution source to meet the 20% opacity limit. (40 CFR 49.124 (d))</p>	
b. Compliance Demonstration:	c. Test Methods, Recordkeeping, and Monitoring:
<p>(1) Lint filters shall be in line and shall be operated at all times when the process is in operation.</p> <p>(2) These dryers may only be fired using natural gas or other fuels approved in writing in advance.</p>	<p>(1) <u>Reference Test Method for Visible Emissions:</u> Whenever compliance emission testing is required US EPA Method 9 shall be used to demonstrate compliance.</p> <p>(2) The facility shall maintain daily records of visual inspection of the lint coup and shall note the date when the lint coup collection fabric is replaced</p>

D. Boiler B01 – 10.46 MMBtu Natural Gas Fired Boiler - 1982.	
Pollutant: 1. Particulate Matter Emissions	
a. Limitations: (1) Particulate matter emissions from a combustion source stack (except for wood-fired boilers) must not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot), corrected to seven percent oxygen, during any three-hour period. (40 CFR 49.125 (d)(1))	
b. Compliance Demonstration:	c. Test Methods, Recordkeeping, and Monitoring:
(1) This boiler may only be fired using natural gas or other fuels approved in advance in writing.	(1) <u>Reference Test Method for Particulate Matter Emissions:</u> Whenever compliance emission testing is required, the appropriate US EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 shall be used to demonstrate compliance.
Pollutant: 2. Visible Emissions	
a. Limitations: The visible emissions from an air pollution source must not exceed 20% opacity, averaged over any consecutive six-minute period, unless the owner or operator of the air pollution source demonstrates to the Regional Administrator's satisfaction that the presence of uncombined water, such as steam, is the only reason for the failure of an air pollution source to meet the 20% opacity limit. (40 CFR 49.124 (d))	
b. Compliance Demonstration:	c. Test Methods, Recordkeeping, and Monitoring:
(1) This boiler may only be fired using natural gas or other fuels approved in advance in writing shall serve as the compliance demonstration method for visible emissions.	(1) <u>Reference Test Method for Visible Emissions:</u> Whenever compliance emission testing is required US EPA Method 9 shall be used to demonstrate compliance.

ZZZ.**1. Compliance Reports/Records.**

- (1) The permittee shall submit a monitoring report which contains the results of monitoring or a summary of monitoring results required by this permit to the Department every six (6) months. 40 CFR 71.6(a)(3)(iii)(A)
- (a) The time periods to be addressed by the submittal are January 1 to June 30 and July 1 to December 31.
 - (b) The report shall be submitted to the Air and Radiation Division, US EPA, 77 W. Jackson Street, Chicago, IL 60604 by March 1 or September 1 after the end of each reporting period.
 - (c) All deviations from and violations of applicable requirements shall be clearly identified in the submittal.
 - (d) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report.
- (2) The permittee shall submit an annual certification of compliance with the requirements of this permit Air and Radiation Division, US EPA, 77 W. Jackson Street, Chicago, IL 60604.
- (a) The time period to be addressed by the report is January 1 to December 31 of the preceding year.
 - (b) The report shall be submitted to US EPA by March 1 after the end of each reporting period.
 - (c) The information included in the report shall include the following:
 - (i) Identification of each permit term or condition that is the basis of the certification;
 - (ii) The compliance status of the source with respect to each term or condition identified;
 - (iii) Whether compliance was continuous or intermittent;
 - (iv) Method(s) used for determining the compliance status, currently and over the previous 12 month period;
 - (v) Compliance status with respect to 40 CFR 68 (Accidental Release Prevention) including registration and submission of the risk management plan, as specified in 40 CFR 68.160 and 68.150, respectively, if applicable;
 - (vi) Other information required to determine the compliance status of the source, as specified in this permit.
 - (d) Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report.

Appendix B

40 CFR Part 71 Operation Permit Application Forms



Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name G & K Services, Inc.

Mailing address: Street or P.O. Box 800 Isbell Street

City Green Bay State WI ZIP 54303 - _____

Contact person: Douglas Krysiak Title General Manager

Telephone (920) 497 - 2509 Ext. _____

Facsimile (920) 497 - 8498

B. Facility Location

Temporary source? Yes No Plant site location 800 Isbell Street

City Green Bay State WI County Brown EPA Region V

Is the facility located within:

Indian lands? YES NO OCS waters? YES NO

Non-attainment area? YES NO If yes, for what air pollutants? _____

Within 50 miles of affected State? YES NO If yes, What State(s)? WI

C. Owner

Name G & K Services, Inc. Street/P.O. Box 5995 Opus Parkway

City Minnetonka State MN ZIP 55343 - _____

Telephone (952) 912 - 5500 Ext _____

D. Operator

Name G & K Services, Inc. Street/P.O. Box 800 Isbell Street

City Green Bay State WI ZIP 54303 - _____

Telephone (920) 497 - 2509 Ext _____

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

Initial Permit Renewal Significant Mod Minor Permit Mod(MPM)

Group Processing, MPM Administrative Amendment

For initial permits, when did operations commence? 06 / / 1982

For permit renewal, what is the expiration date of current permit? / /

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

SIP FIP/TIP PSD Non-attainment NSR

Minor source NSR Section 111 Phase I acid rain Phase II acid rain

Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MACT

Sec. 112(g) MACT Early reduction of HAP Sec 112(j) MACT RMP [Sec.112(r)]

Tank Vessel requirements, sec. 183(f)) Section 129 Standards/Requirement

Consumer / comm.. products, ' 183(e) NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? YES NO Regulatory agency

Phase II acid rain application submitted? YES NO If yes, Permitting authority

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Facility-wide VOC emissions limited to 234 tons per year.

PM: 0.1 gr/dscf for stack-vented PM emissions.

Facility-wide individual HAP emissions limited to 9.9 tons per year.

Facility-wide total HAP emissions limited to 24.9 tons per year.

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Industrial Laundry	soiled print towels ("inkers")*,	7218
	shop towels, coveralls, uniforms,	
	mats, industrial towels, and	
	other textiles	

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should be listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
B01	10.46 MMBtu/hr Natural Gas-fired Boiler
P01	Industrial Washers - Indoor Vented
P02	Industrial Washers - Stack Vented
P03	Industrial Dryers burning Natural Gas

*Soiled print towels ("inkers") include towels from printers, wood-working/finishing facilities, and other operations which return VOC-laden towels.

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx	<u>25.7</u>	tons/yr	VOC	<u>234.0*</u>	tons/yr	SO2	<u>0.0</u>	tons/yr
PM-10	<u>188.6</u>	tons/yr	CO	<u>12.7</u>	tons/yr	Lead	<u>0.0</u>	tons/yr
Total HAP <u>24.9**</u> tons/yr								
Single HAP emitted in the greatest amount <u>Toluene</u>							PTE <u>9.9**</u> tons/yr	
Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE <u>62</u> tons/yr								

K. Existing Federally-Enforceable Permits

Permit number(s)	<u>405028690-P13</u>	Permit type	<u>FESOP</u>	Permitting authority	<u>WDNR</u>
Permit number(s)	<u>See Attachment 1</u>	Permit type	<u></u>	Permitting authority	<u></u>

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit	<u>NA</u>
Check one:	<input type="checkbox"/> Application made <input type="checkbox"/> Coverage granted
General permit identifier	<u></u> Expiration Date <u> </u> / <u> </u> / <u> </u>

M. Cross-referenced Information

Does this application cross-reference information?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO (If yes, see instructions)
--	---

INSTRUCTIONS FOLLOW

*PTE VOC emissions reflect Federally-enforceable limit established in WDNR permit No. 405028690-P13. Unrestricted VOC emissions for the facility would be 1,509.8 tons per year.

**PTE HAP emissions reflect Federally-enforceable limit established in WDNR permit No. 405028690-P13. Unrestricted HAP emissions for the facility would be 272.3 tons per year for total HAPs and 122.7 for toluene (highest single HAP emission rate).

Attachment 1.

Additional Existing Federally-enforceable Permits

Permit Number	Permit Type	Permit Authority
00-DCF-137	Construction	WDNR
04-DCF-260	Construction	WDNR
07-JJW-251	Construction	WDNR
09-JJW-148	Construction	WDNR
11-JJW-047	Construction	WDNR



OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID B01 Description Natural Gas-fired Boiler
SIC Code (4-digit) 7218 SCC Code 10300602

B. Emissions Unit Description

Primary use Steam production Temporary Source Yes No
Manufacturer Cleaver Brooks Model No. CB293X-250
Serial Number L51325 Installation Date 06 / / 1982
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) _____
Boiler horsepower rating 250 Boiler steam flow (lb/hr) _____
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 10.46 MM BTU/hr Max. Design Heat Input 10.46 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural gas	NA	NA	1,020 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural gas	17.9 MMCF	10.25 MCF	89.83 MMCF

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____/____/____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) <u>NA</u>	Inside stack diameter (ft) _____
Stack temp(°F) _____	Design stack flow rate (ACFM) _____
Actual stack flow rate (ACFM) _____	Velocity (ft/sec) _____



OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID P03 Description Industrial Dryers
SIC Code (4-digit) 7218 SCC Code _____

B. Emissions Unit Description

Primary use Industrial Dryers Temporary Source Yes No
Manufacturer various Model No. various
Serial Number various Installation Date / / 1994 - 2006
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) Natural gas-fired industrial dryers
Boiler horsepower rating NA Boiler steam flow (lb/hr) NA
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 13.05 MM BTU/hr Max. Design Heat Input 13.05 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural gas	NA	NA	1,020 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural gas	12.8 MMCF	12.79 MCF	112 MMCF

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____/____/____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) <u>NA</u>	Inside stack diameter (ft) _____
Stack temp(°F) _____	Design stack flow rate (ACFM) _____
Actual stack flow rate (ACFM) _____	Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID P01 Description Industrial Washers - Indoor vented
 SIC Code (4-digit) 7218 SCC Code

B. Emissions Unit Description

Primary use or equipment type Industrial Washers
 Manufacturer Various Model No.
 Serial No. Installation date / / 2005-2007
 Raw materials soiled shop towels and other textiles, water, detergent
 Finished products clean shop towels and other textiles
 Temporary source: No Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	92.6 shop towels lb/hr*	288,900 lb/year*
Maximum rate	4,688 shop towels lb/hr*	41,066,880 lb/year*

D. Associated Air Pollution Control Equipment

Emissions unit ID NA Device Type
 Manufacturer Model No.
 Serial No. Installation date / /
 Control efficiency (%) Capture efficiency (%)
 Air pollutant(s) controlled Efficiency estimation method

*Throughputs include only those textiles processed that generate VOC or HAP emissions; other non-emitting activities are not included in these throughputs.

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common).

Stack height (ft) NA Inside stack diameter (ft) _____

Stack temp (F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID P02 Description Industrial Washers - Stack vented
 SIC Code (4-digit) 7218 SCC Code _____

B. Emissions Unit Description

Primary use or equipment type Industrial Washers
 Manufacturer Various Model No. _____
 Serial No. _____ Installation date ____/____/1994-2011
 Raw materials soiled shop/print towels ("inkers"), other textiles, water, detergent
 Finished products clean shop/print towels and other textiles
 Temporary source: No Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	227 shop/inkers lb/hr*	1,125,800 lb/year*
Maximum rate	2,600 shop/inkers lb/hr*	22,776,000 lb/year*

D. Associated Air Pollution Control Equipment

Emissions unit ID NA Device Type _____
 Manufacturer _____ Model No _____
 Serial No. _____ Installation date ____/____/_____
 Control efficiency (%) _____ Capture efficiency (%) _____
 Air pollutant(s) controlled _____ Efficiency estimation method _____

*Throughputs include only those textiles processed that generate VOC or HAP emissions; other non-emitting activities are not included in these throughputs.

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common)).

Stack height (ft) NA Inside stack diameter (ft) _____

Stack temp (F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID P03 Description Industrial Dryers
 SIC Code (4-digit) 7218 SCC Code _____

B. Emissions Unit Description

Primary use or equipment type Industrial Dryers
 Manufacturer Various Model No. _____
 Serial No. _____ Installation date ____/____/1994-2006
 Raw materials shop or print towels ("inkers") and other textiles
 Finished products shop or print towels and other textiles
 Temporary source: No Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	227 shop/inkers lb/hr*	1,414,720 lb/year*
Maximum rate	5,674 shop/inkers lb/hr*	49,704,240 lb/year*

D. Associated Air Pollution Control Equipment

Emissions unit ID NA Device Type _____
 Manufacturer _____ Model No _____
 Serial No. _____ Installation date ____/____/_____
 Control efficiency (%) _____ Capture efficiency (%) _____
 Air pollutant(s) controlled _____ Efficiency estimation method _____

*Throughputs include only those textiles processed that generate VOC or HAP emissions; other non-emitting activities are not included in these throughputs.

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common).

Stack height (ft) NA Inside stack diameter (ft) _____

Stack temp (F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____

Federal Operating Permit Program (40 CFR Part 71)

INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
1	Steam Tunnel (0.8 MMBtu/hr nat gas)	X	X
1	Continuous Roll Towel Machine	X	X
1	Textile sorting and counting area	X	X
1	Wastewater treatment/handling	X	X
1	Boiler and HVAC Maintenance	X	X
1	Convenience Space Heating	X	X
1	Convenience Water Heating	X	X
1	Demineralization/Oxygen scavenging of Boiler Water	X	X
1	Fire Control Equipment	X	X
1	Forktrucks for material transport	X	X
1	Janitorial Activities	X	X
1	Maintenance of grounds, equipment, buildings	X	X
1	Office Activities	X	X
1	Pollution control equipment maintenance	X	X
1	Purging of Natural Gas Lines	X	X
1	Sanitary Sewer, plumbing venting	X	X



Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID B01

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.0	0.1	0.3*	
PM	0.0	0.1	4.7	
HAPs	0.0	0.0	0.0**	
PM10	0.0		4.7	
PM2.5	0.0		4.7	
NOx	0.9		7.7	
SO2	0.0		0.0	
Lead	0.0		0.0	

*Unit is included in Federally-enforceable facility-wide limit of 234 tons per year.

**Unit is included in Federally-enforceable facility-wide limit of 9.9 tons per year for individual HAPs and 24.9 tons per year for total HAPs.



Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID P01

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	1.2	44.3	172.5*	
PM	0.0	0.0	0.0	
HAPs	0.5	16.8	9.9/24.9**	
PM10	0.0		0.0	
PM2.5	0.0		0.0	
NOx	0.0		0.0	
SO2	0.0		0.0	
Lead	0.0		0.0	

*Unit is included in Federally-enforceable facility-wide limit of 234 tons per year.

**PTE HAP emissions reflect Federally-enforceable facility-wide limit established in WDNR permit No. 405028690-P13(9.9 tons per year for each HAP/24.9 tons per year for the combination of all HAPs). Unrestricted PTE HAP emissions for this process would be 65.3 tons per year.



Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID P02

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	51.8	459.6	234.0*	
PM	0.0	2.3	10.0	
HAPs	7.9	67.9	9.9/24.9**	
PM10	0.0		10.0	
PM2.5	0.0		10.0	
NOx	0.0		0.0	
SO2	0.0		0.0	
Lead	0.0		0.0	

*PTE VOC emissions reflect Federally-enforceable facility-wide limit established in WDNR permit No. 405028690-P13. Unit is included in Federally-enforceable facility-wide limit of 234 tons per year. Unrestricted PTE VOC emissions for this process would be 1,183.7 tons per year.

**PTE HAP emissions reflect Federally-enforceable facility-wide limits established in WDNR permit No. 405028690-P13 (9.9 tons per year for each HAP/24.9 tons per year for the combination of all HAPs). Unrestricted PTE HAP emissions for this process would be 175.2 tons per year.



Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID P03

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	4.0	59.4	153.0*	
PM	2.9	39.0	170.8	
HAPs	0.8	8.8	9.9/24.9**	
PM10	2.9		170.8	
PM2.5	2.9		170.8	
NOx	0.9		9.5	
SO2	0.0		0.0	
Lead	0.0		0.0	

*Unit is also included in Federally-enforceable facility-wide limit of 234 tons per year.

**PTE HAP emissions reflect Federally-enforceable facility-wide limit established in WDNR permit No. 405028690-P13(9.9 tons per year for each HAP/24.9 tons per year for the combination of all HAPs). Unrestricted PTE HAP emissions for this process would be 31.8 tons per year.



Federal Operating Permit Program (40 CFR Part 71)

FEE CALCULATION WORKSHEET (FEE)

Use this form initially, or thereafter on an annual basis, to calculate part 71 fees.

A. General Information

Type of fee (Check one): Initial Annual

Deadline for submitting fee calculation worksheet ___/___/___

For initial fees, emissions are based on (Check one):

Actual emissions for the preceding calendar year. (Required in most circumstances.)

Estimates of actual emissions for the current calendar year. (Required when operations commenced during the preceding calendar year.)

Date commenced operations ___/___/___

Estimates of actual emissions for the preceding calendar year. (Optional after a part 71 permit was issued to replace a part 70 permit, but only if initial fee payment is due between January 1 and March 31; otherwise use actual emissions for the preceding calendar year.)

For annual fee payment, you are required to use actual emissions for the preceding calendar year.

B. Source Information: Complete this section only if you are paying fees but not applying for a permit.

Source or facility name _____

Mailing address: Street or P.O. Box _____

City _____ State _____ ZIP _____ - _____

Contact person _____ Title _____

Telephone (____) _____ - _____ Ext _____ Part 71 permit no. _____

C. Certification of Truth, Accuracy and Completeness: Only needed if not submitting a separate form CTAC.

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal (form and attachments) are true, accurate and complete.

Name (signed) _____

Name (typed) _____ Date: ___/___/___

E. Annual Emissions Report for Fee Calculation Purposes -- HAP

HAP Identification. Identify individual HAP emitted at the facility, identify the CAS number, and assign a unique identifier for use in the second table in this section. Whenever assigning identifier codes, use "HAP1" for the first, "HAP2" for the second, and so on.

Name of HAP	CAS No	Identifier
See Attachment 2.		

HAP Emissions. Report the actual emissions of individual HAP identified above. Use the identifiers assigned in the table above. Include all emissions, including fugitives, and do not include insignificant emissions. You may round to the nearest tenth of a ton. Sum the emissions in each column and enter a subtotal at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000.

This data is for _____ (year)

Emissions Unit ID	Actual Emissions (Tons/Year)							
	HAP__	HAP__	HAP__	HAP__	HAP__	HAP__	HAP__	HAP__
		See Attachment 2.						
SUBTOTALS								

F. Fee Calculation Worksheet

This section is used to calculate the total fee owed for both initial and annual fee payment purposes. Reconciliation is only for cases where you are paying the annual fee and you used any type of estimate of actual emissions when you calculated the initial fee. If you do not need to reconcile fees, only complete line 1-5 and then skip down to lines 21 – 26. See instructions for more detailed explanation.

1. Sum the emissions from section D of this form (non-HAP) and enter the total (tons).	61.7
2. Sum the emissions from section E of this form (HAP) and enter the total (tons).	9.1
3. Sum lines 1 and 2.	70.8
4. Enter the emissions that were counted twice. If none, enter "0."	9.1
5. Subtract line 4 from line 3, round to the nearest ton, and enter the result here.	62
RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "CURRENT" CALENDAR YEAR)	
<p>Only complete lines 6-10 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 21.</p>	
6. Enter the total estimated actual emissions for the year the initial fee was paid (previously reported on line 5 of the initial fee form).	
7. If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result. Otherwise enter "0."	
8. If line 6 is greater than line 5, subtract line 5 from line 6, and enter the result. Otherwise enter "0."	
9. If line 7 is greater than 0, multiply line 7 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment. Go to line 21.	
10. If line 8 is greater than 0, multiply line 8 by last year's fee rate (\$/ton) and enter the result here. This is the overpayment. Go to line 21.	
RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "PRECEDING" CALENDAR YEAR)	
<p>Only complete lines 11-20 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year preceding initial fee payment; otherwise skip to line 21. If completing this section, you will also need to complete sections D and E to report actual emissions for the calendar year preceding initial fee payment.</p>	
11. Sum the actual emissions from section D (non-HAP) for the calendar year preceding initial fee payment and enter the result here.	
12. Sum the actual emissions from section E (HAP) for the calendar year preceding initial fee payment and enter the result here.	
13. Add lines 11 and 12 and enter the total here. These are total actual emissions for the calendar year preceding initial fee payment.	
14. Enter double counted emission from line 13 here. If none, enter "0."	
15. Subtract line 14 from line 13, round to the nearest ton, and enter the result here.	

16. Enter the total estimated actual emissions previously reported on line 5 of the initial fee form. These are estimated actual emissions for the calendar year preceding initial fee payment.	
17. If line 15 is greater than line 16, subtract line 16 from line 15, and enter the result here. Otherwise enter "0."	
18. If line 16 is greater than line 15, subtract line 15 from line 16, and enter the result here. Otherwise enter "0."	
19. If line 17 is greater than 0, multiply line 17 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment.	
20. If line 18 is greater than 0, multiply line 18 by last year's fee rate (\$/ton) and enter the result on this line. This is the overpayment.	
FEE CALCULATION	
21. Multiply line 5 (tons) by the current fee rate (\$/ton) and enter the result here.	\$2,996.46
22. Enter any underpayment from line 9 or 19 here. Otherwise enter "0."	0
23. Enter any overpayment from line 10 or 20 here. Otherwise enter "0."	0
24. If line 22 is greater than "0," add it to line 21 and enter the result here. If line 23 is greater than "0," subtract this from line 21 and enter the result here. Otherwise enter the amount on line 21 here. This is the fee adjusted for reconciliation.	\$2,996.46
25. If your account was credited for fee assessment error since the last time you paid fees, enter the amount of the credit here. Otherwise enter "0."	0
26. Subtract line 25 from line 24 and enter the result here. Stop here. This is the total fee amount that you must remit to EPA.	\$2,996.46

Attachment 2. FEE HAPS

Name of HAP	CAS No.	Identifier
Methylene Chloride	75-09-2	HAP 1
n-Hexane	110-54-3	HAP 2
1,2-Dichloroethane	107-06-2	HAP 3
Trichloroethene	79-01-6	HAP 4
Toluene	108-88-3	HAP 5
Tetrachloroethene	127-18-4	HAP 6
Ethylbenzene	100-41-4	HAP 7
m-Xylene	108-38-3	HAP 8
p-Xylene	106-42-3	HAP 9
o-Xylene	95-47-6	HAP 10
Cumene	98-82-8	HAP 11
Naphthalene	91-20-3	HAP 12
4-Methyl-2-pentanone	108-10-1	HAP 13
Methanol	67-56-1	HAP 14

This data is for : 2012 (year)

Emission Unit ID	Actual Emissions (Tons/Year)													
	HAP 1	HAP 2	HAP 3	HAP 4	HAP 5	HAP 6	HAP 7	HAP 8	HAP 9	HAP 10	HAP 11	HAP 12	HAP 13	HAP 14
B10	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
P01	0.0	0.0	0.0	0.0	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
P02	0.0	0.0	0.0	0.1	3.6	0.2	0.8	0.9	0.9	0.9	0.2	0.0	0.1	0.2
P03	0.0	0.0	0.0	0.0	0.3	0.2	0.0	0.1	0.1	0.1	0.0	0.0	0.0	0.0
P04	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Subtotals	0.0	0.0	0.0	0.1	4.1	0.6	0.8	1.0	1.0	1.0	0.2	0.0	0.1	0.2



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Federal Operating Permit Program (40 CFR Part 71)

FEE FILING FORM (FF)

Complete this form each time you prepare form **FEE** and send this form to the appropriate lockbox bank address, along with full payment. This form required at time of initial fee payment, and thereafter, when paying annual fees.

Source or Facility Name G & K Services, Inc.

Source Location 800 Isbell Street, Green Bay, WI 54303

EPA Region where Source Located EPA Region 5

Mailing Address:

Street/P.O. Box 800 Isbell Street City Green Bay

State WI ZIP 54303 - _____

Contact Person: Douglas Krysiak Title General Manager

Telephone (920) 497 - 2509 Ext. _____

Total Fee Payment Remitted: \$ 2,996.46

Federal Operating Permit Program (40 CFR Part 71)

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): B01

Applicable Requirement (Describe and Cite)

PM: 0.1 gr/dscf @ 7% Oxygen for stack-vented PM emissions

40 CFR 49.125(d) (1)

Compliance Methods for the Above (Description and Citation):

Only natural gas will be burned.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): P02, P03

Applicable Requirement (Description and Citation):

PM: 0.1 gr/dscf for stack-vented PM emissions, 40 CFR 49.125(d) (3)

Compliance Methods for the Above (Description and Citation):

Washers and dryers will be operated and maintained to minimize PM emissions.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s) NA Requirement _____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe): <u>NA</u>
First Report ___/___/___ Frequency of Submittal _____
Contents of Progress Report (describe):
First Report ___/___/___ Frequency of Submittal _____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).

Frequency of submittal Annually Beginning 02/14/2014

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: X In Compliance Not In Compliance

Compliance Certification Requirements: X In Compliance Not In Compliance



Federal Operating Permit Program (40 CFR Part 71)

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): Facility-wide (B01, P01, P02, P03, and insignificant units)

Applicable Requirement (Describe and Cite)

Facility-wide VOC emissions may not exceed 39,000 pounds per month, averaged over any 12 consecutive month period. (234 tons of VOC per year) (Operation Permit 405028690-P13)

Compliance Methods for the Above (Description and Citation):

Permittee shall calculate VOC emissions for each month and shall calculate the monthly VOC emissions averaged over each 12 consecutive month period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility-wide (B01, P01, P02, P03, and insignificant units)

Applicable Requirement (Description and Citation):

Individual federal HAP emissions may not exceed 1,650 pounds per month averaged over any 12 consecutive month period. Aggregate of federal HAP emissions may not exceed 4,150 pounds per month averaged over any 12 consecutive month period.

Compliance Methods for the Above (Description and Citation):

Permittee shall calculate individual and aggregate federal HAP emissions for each month and shall calculate the monthly individual and aggregate federal HAP emissions averaged over each 12 consecutive month period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s) NA Requirement _____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe): NA

First Report ___/___/___ Frequency of Submittal _____

Contents of Progress Report (describe):

First Report ___/___/___ Frequency of Submittal _____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).

Frequency of submittal _____ Beginning ___/___/___

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: X In Compliance Not In Compliance

Compliance Certification Requirements: X In Compliance Not In Compliance



OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Botts (First) Steve
(MI) _____

Title Director of Environmental Management

Street or P.O. Box 5995 Opus Parkway

City Minnetonka State MN ZIP 55343 -

Telephone (952) 912 - 5500 Ext. _____ Facsimile (____) _____ -

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed)  _____

Name (typed) Steve Botts Date: 6 / 14 / 2013





40 CFR Part 71 Operation Permit Application

G & K Services, Inc.
Green Bay, Wisconsin

June 2013



40 CFR Part 71 Operation Permit Application

G & K Services, Inc.

Green Bay, Wisconsin

June 2013

TRC Environmental Corporation | G & K Services, Inc.



OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name G & K Services, Inc.
Mailing address: Street or P.O. Box 800 Isbell Street
City Green Bay State WI ZIP 54303 -
Contact person: Douglas Krysiak Title General Manager
Telephone (920) 497 - 2509 Ext. _____
Facsimile (920) 497 - 8498

B. Facility Location

Temporary source? Yes No Plant site location 800 Isbell Street

City Green Bay State WI County Brown EPA Region V
Is the facility located within:
Indian lands? YES NO OCS waters? YES NO
Non-attainment area? YES NO If yes, for what air pollutants? _____
Within 50 miles of affected State? YES NO If yes, What State(s)? WI

C. Owner

Name G & K Services, Inc. Street/P.O. Box 5995 Opus Parkway
City Minnetonka State MN ZIP 55343 -
Telephone (952) 912 - 5500 Ext. _____

D. Operator

Name G & K Services, Inc. Street/P.O. Box 800 Isbell Street
City Green Bay State WI ZIP 54303 -
Telephone (920) 497 - 2509 Ext. _____

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

Initial Permit Renewal Significant Mod Minor Permit Mod(MPM)

Group Processing, MPM Administrative Amendment

For initial permits, when did operations commence? 06 / / 1982

For permit renewal, what is the expiration date of current permit? / /

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

SIP FIP/TIP PSD Non-attainment NSR

Minor source NSR Section 111 Phase I acid rain Phase II acid rain

Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MACT

Sec. 112(g) MACT Early reduction of HAP Sec 112(j) MACT RMP [Sec.112(r)]

Tank Vessel requirements, sec. 183(f)) Section 129 Standards/Requirement

Consumer / comm.. products, ' 183(e) NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? YES NO Regulatory agency

Phase II acid rain application submitted? YES NO If yes, Permitting authority

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Facility-wide VOC emissions limited to 234 tons per year.
PM: 0.1 gr/dscf for stack-vented PM emissions.
Facility-wide individual HAP emissions limited to 9.9 tons per year.
Facility-wide total HAP emissions limited to 24.9 tons per year.

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx	<u>25.7</u>	tons/yr	VOC	<u>234.0*</u>	tons/yr	SO2	<u>0.0</u>	tons/yr
PM-10	<u>188.6</u>	tons/yr	CO	<u>12.7</u>	tons/yr	Lead	<u>0.0</u>	tons/yr
Total HAP	<u>24.9**</u>	tons/yr						
Single HAP emitted in the greatest amount	<u>Toluene</u>					PTE	<u>9.9**</u>	tons/yr
Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE								<u>62</u> tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s)	<u>405028690-P13</u>	Permit type	<u>FESOP</u>	Permitting authority	<u>WDNR</u>
Permit number(s)	<u>See Attachment 1</u>	Permit type	<u></u>	Permitting authority	<u></u>

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit	<u>NA</u>		
Check one:	<input type="checkbox"/> Application made	<input type="checkbox"/> Coverage granted	
General permit identifier	<u></u>	Expiration Date	<u>___/___/___</u>

M. Cross-referenced Information

Does this application cross-reference information?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	(If yes, see instructions)
--	------------------------------	--	----------------------------

INSTRUCTIONS FOLLOW

*PTE VOC emissions reflect Federally-enforceable limit established in WDNR permit No. 405028690-P13. Unrestricted VOC emissions for the facility would be 1,509.8 tons per year.

**PTE HAP emissions reflect Federally-enforceable limit established in WDNR permit No. 405028690-P13. Unrestricted HAP emissions for the facility would be 272.3 tons per year for total HAPs and 122.7 for toluene (highest single HAP emission rate).

Attachment 1.

Additional Existing Federally-enforceable Permits

Permit Number	Permit Type	Permit Authority
00-DCF-137	Construction	WDNR
04-DCF-260	Construction	WDNR
07-JJW-251	Construction	WDNR
09-JJW-148	Construction	WDNR
11-JJW-047	Construction	WDNR



OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID B01 Description Natural Gas-fired Boiler
SIC Code (4-digit) 7218 SCC Code 10300602

B. Emissions Unit Description

Primary use Steam production Temporary Source Yes No
Manufacturer Cleaver Brooks Model No. CB293X-250
Serial Number L51325 Installation Date 06 / ___ / 1982
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) _____
Boiler horsepower rating 250 Boiler steam flow (lb/hr) _____
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 10.46 MM BTU/hr Max. Design Heat Input 10.46 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural gas	NA	NA	1,020 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural gas	17.9 MMCF	10.25 MCF	89.83 MMCF

E. Associated Air Pollution Control Equipment

Emissions unit ID <u>NA</u> Device type _____
Air pollutant(s) Controlled _____ Manufacturer _____
Model No. _____ Serial No. _____
Installation date ____ / ____ / ____ Control efficiency (%) _____
Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) <u>NA</u>	Inside stack diameter (ft) _____
Stack temp(°F) _____	Design stack flow rate (ACFM) _____
Actual stack flow rate (ACFM) _____	Velocity (ft/sec) _____



OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID P03 Description Industrial Dryers
SIC Code (4-digit) 7218 SCC Code _____

B. Emissions Unit Description

Primary use Industrial Dryers Temporary Source Yes No
Manufacturer various Model No. various
Serial Number various Installation Date ___/___/1994 - 2006
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) Natural gas-fired industrial dryers
Boiler horsepower rating NA Boiler steam flow (lb/hr) NA
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 13.05 MM BTU/hr Max. Design Heat Input 13.05 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural gas	NA	NA	1,020 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural gas	12.8 MMCF	12.79 MCF	112 MMCF

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____/____/____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) <u>NA</u>	Inside stack diameter (ft) _____
Stack temp(°F) _____	Design stack flow rate (ACFM) _____
Actual stack flow rate (ACFM) _____	Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID P01 Description Industrial Washers - Indoor vented
SIC Code (4-digit) 7218 SCC Code _____

B. Emissions Unit Description

Primary use or equipment type Industrial Washers
Manufacturer Various Model No. _____
Serial No. _____ Installation date / / 2005-2007
Raw materials soiled shop towels and other textiles, water, detergent
Finished products clean shop towels and other textiles
Temporary source: No Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	92.6 shop towels lb/hr*	288,900 lb/year*
Maximum rate	4,688 shop towels lb/hr*	41,066,880 lb/year*

D. Associated Air Pollution Control Equipment

Emissions unit ID NA Device Type _____
Manufacturer _____ Model No _____
Serial No. _____ Installation date / /
Control efficiency (%) _____ Capture efficiency (%) _____
Air pollutant(s) controlled _____ Efficiency estimation method _____

*Throughputs include only those textiles processed that generate VOC or HAP emissions; other non-emitting activities are not included in these throughputs.

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common).

Stack height (ft) NA Inside stack diameter (ft) _____

Stack temp (F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID P02 Description Industrial Washers - Stack vented
 SIC Code (4-digit) 7218 SCC Code _____

B. Emissions Unit Description

Primary use or equipment type Industrial Washers
 Manufacturer Various Model No. _____
 Serial No. _____ Installation date ____ / ____ / 1994-2011
 Raw materials soiled shop/print towels ("inkers"), other textiles, water, detergent
 Finished products clean shop/print towels and other textiles
 Temporary source: No Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	227 shop/inkers lb/hr*	1,125,800 lb/year*
Maximum rate	2,600 shop/inkers lb/hr*	22,776,000 lb/year*

D. Associated Air Pollution Control Equipment

Emissions unit ID NA Device Type _____
 Manufacturer _____ Model No _____
 Serial No. _____ Installation date ____ / ____ / ____
 Control efficiency (%) _____ Capture efficiency (%) _____
 Air pollutant(s) controlled _____ Efficiency estimation method _____

*Throughputs include only those textiles processed that generate VOC or HAP emissions; other non-emitting activities are not included in these throughputs.

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common)).

Stack height (ft) NA Inside stack diameter (ft) _____

Stack temp (F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID P03 Description Industrial Dryers
 SIC Code (4-digit) 7218 SCC Code

B. Emissions Unit Description

Primary use or equipment type Industrial Dryers
 Manufacturer Various Model No.
 Serial No. Installation date / / 1994-2006
 Raw materials shop or print towels ("inkers") and other textiles
 Finished products shop or print towels and other textiles
 Temporary source: No Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	227 shop/inkers lb/hr*	1,414,720 lb/year*
Maximum rate	5,674 shop/inkers lb/hr*	49,704,240 lb/year*

D. Associated Air Pollution Control Equipment

Emissions unit ID NA Device Type
 Manufacturer Model No
 Serial No. Installation date / /
 Control efficiency (%) Capture efficiency (%)
 Air pollutant(s) controlled Efficiency estimation method

*Throughputs include only those textiles processed that generate VOC or HAP emissions; other non-emitting activities are not included in these throughputs.

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common).

Stack height (ft) NA Inside stack diameter (ft) _____

Stack temp (F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____

Federal Operating Permit Program (40 CFR Part 71)

INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
1	Steam Tunnel (0.8 MMBtu/hr nat gas)	X	X
1	Continuous Roll Towel Machine	X	X
1	Textile sorting and counting area	X	X
1	Wastewater treatment/handling	X	X
1	Boiler and HVAC Maintenance	X	X
1	Convenience Space Heating	X	X
1	Convenience Water Heating	X	X
1	Demineralization/Oxygen scavenging of Boiler Water	X	X
1	Fire Control Equipment	X	X
1	Forktrucks for material transport	X	X
1	Janitorial Activities	X	X
1	Maintenance of grounds, equipment, buildings	X	X
1	Office Activities	X	X
1	Pollution control equipment maintenance	X	X
1	Purging of Natural Gas Lines	X	X
1	Sanitary Sewer, plumbing venting	X	X



Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID B01

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.0	0.1	0.3*	
PM	0.0	0.1	4.7	
HAPs	0.0	0.0	0.0**	
PM10	0.0		4.7	
PM2.5	0.0		4.7	
NOx	0.9		7.7	
SO2	0.0		0.0	
Lead	0.0		0.0	

*Unit is included in Federally-enforceable facility-wide limit of 234 tons per year.

**Unit is included in Federally-enforceable facility-wide limit of 9.9 tons per year for individual HAPs and 24.9 tons per year for total HAPs.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID P01

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	1.2	44.3	172.5*	
PM	0.0	0.0	0.0	
HAPs	0.5	16.8	9.9/24.9**	
PM10	0.0		0.0	
PM2.5	0.0		0.0	
NOx	0.0		0.0	
SO2	0.0		0.0	
Lead	0.0		0.0	

*Unit is included in Federally-enforceable facility-wide limit of 234 tons per year.

**PTE HAP emissions reflect Federally-enforceable facility-wide limit established in WDNR permit No. 405028690-P13(9.9 tons per year for each HAP/24.9 tons per year for the combination of all HAPs). Unrestricted PTE HAP emissions for this process would be 65.3 tons per year.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID P02

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	51.8	459.6	234.0*	
PM	0.0	2.3	10.0	
HAPs	7.9	67.9	9.9/24.9**	
PM10	0.0		10.0	
PM2.5	0.0		10.0	
NOx	0.0		0.0	
SO2	0.0		0.0	
Lead	0.0		0.0	

*PTE VOC emissions reflect Federally-enforceable facility-wide limit established in WDNR permit No. 405028690-P13. Unit is included in Federally-enforceable facility-wide limit of 234 tons per year. Unrestricted PTE VOC emissions for this process would be 1,183.7 tons per year.

**PTE HAP emissions reflect Federally-enforceable facility-wide limits established in WDNR permit No. 405028690-P13 (9.9 tons per year for each HAP/24.9 tons per year for the combination of all HAPs). Unrestricted PTE HAP emissions for this process would be 175.2 tons per year.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID P03

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	4.0	59.4	153.0*	
PM	2.9	39.0	170.8	
HAPs	0.8	8.8	9.9/24.9**	
PM10	2.9		170.8	
PM2.5	2.9		170.8	
NOx	0.9		9.5	
SO2	0.0		0.0	
Lead	0.0		0.0	

*Unit is also included in Federally-enforceable facility-wide limit of 234 tons per year.

**PTE HAP emissions reflect Federally-enforceable facility-wide limit established in WDNR permit No. 405028690-P13 (9.9 tons per year for each HAP/24.9 tons per year for the combination of all HAPs). Unrestricted PTE HAP emissions for this process would be 31.8 tons per year.



Federal Operating Permit Program (40 CFR Part 71)

FEE CALCULATION WORKSHEET (FEE)

Use this form initially, or thereafter on an annual basis, to calculate part 71 fees.

A. General Information

Type of fee (Check one): Initial Annual

Deadline for submitting fee calculation worksheet ____/____/____

For initial fees, emissions are based on (Check one):

Actual emissions for the preceding calendar year. (Required in most circumstances.)

Estimates of actual emissions for the current calendar year. (Required when operations commenced during the preceding calendar year.)

Date commenced operations ____/____/____

Estimates of actual emissions for the preceding calendar year. (Optional after a part 71 permit was issued to replace a part 70 permit, but only if initial fee payment is due between January 1 and March 31; otherwise use actual emissions for the preceding calendar year.)

For annual fee payment, you are required to use actual emissions for the preceding calendar year.

B. Source Information: Complete this section only if you are paying fees but not applying for a permit.

Source or facility name _____

Mailing address: Street or P.O. Box _____

City _____ State _____ ZIP _____ - _____

Contact person _____ Title _____

Telephone (____) _____ - _____ Ext _____ Part 71 permit no. _____

C. Certification of Truth, Accuracy and Completeness: Only needed if not submitting a separate form CTAC.

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal (form and attachments) are true, accurate and complete.

Name (signed) _____

Name (typed) _____ Date: ____/____/____

E. Annual Emissions Report for Fee Calculation Purposes -- HAP

HAP Identification. Identify individual HAP emitted at the facility, identify the CAS number, and assign a unique identifier for use in the second table in this section. Whenever assigning identifier codes, use "HAP1" for the first, "HAP2" for the second, and so on.

Name of HAP	CAS No	Identifier
See Attachment 2.		

HAP Emissions. Report the actual emissions of individual HAP identified above. Use the identifiers assigned in the table above. Include all emissions, including fugitives, and do not include insignificant emissions. You may round to the nearest tenth of a ton. Sum the emissions in each column and enter a subtotal at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000.

This data is for _____ (year)

Emissions Unit ID	Actual Emissions (Tons/Year)							
	HAP__	HAP__	HAP__	HAP__	HAP__	HAP__	HAP__	HAP__
		See Attachment 2.						
SUBTOTALS								

F. Fee Calculation Worksheet

This section is used to calculate the total fee owed for both initial and annual fee payment purposes. Reconciliation is only for cases where you are paying the annual fee and you used any type of estimate of actual emissions when you calculated the initial fee. If you do not need to reconcile fees, only complete line 1-5 and then skip down to lines 21 – 26. See instructions for more detailed explanation.

1. Sum the emissions from section D of this form (non-HAP) and enter the total (tons).	61.7
2. Sum the emissions from section E of this form (HAP) and enter the total (tons).	9.1
3. Sum lines 1 and 2.	70.8
4. Enter the emissions that were counted twice. If none, enter "0."	9.1
5. Subtract line 4 from line 3, round to the nearest ton, and enter the result here.	62
RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "CURRENT" CALENDAR YEAR)	
<p>Only complete lines 6-10 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 21.</p>	
6. Enter the total estimated actual emissions for the year the initial fee was paid (previously reported on line 5 of the initial fee form).	
7. If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result. Otherwise enter "0."	
8. If line 6 is greater than line 5, subtract line 5 from line 6, and enter the result. Otherwise enter "0."	
9. If line 7 is greater than 0, multiply line 7 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment. Go to line 21.	
10. If line 8 is greater than 0, multiply line 8 by last year's fee rate (\$/ton) and enter the result here. This is the overpayment. Go to line 21.	
RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "PRECEDING" CALENDAR YEAR)	
<p>Only complete lines 11-20 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year preceding initial fee payment; otherwise skip to line 21. If completing this section, you will also need to complete sections D and E to report actual emissions for the calendar year preceding initial fee payment.</p>	
11. Sum the actual emissions from section D (non-HAP) for the calendar year preceding initial fee payment and enter the result here.	
12. Sum the actual emissions from section E (HAP) for the calendar year preceding initial fee payment and enter the result here.	
13. Add lines 11 and 12 and enter the total here. These are total actual emissions for the calendar year preceding initial fee payment.	
14. Enter double counted emission from line 13 here. If none, enter "0."	
15. Subtract line 14 from line 13, round to the nearest ton, and enter the result here.	

16. Enter the total estimated actual emissions previously reported on line 5 of the initial fee form. These are estimated actual emissions for the calendar year preceding initial fee payment.	
17. If line 15 is greater than line 16, subtract line 16 from line 15, and enter the result here. Otherwise enter "0."	
18. If line 16 is greater than line 15, subtract line 15 from line 16, and enter the result here. Otherwise enter "0."	
19. If line 17 is greater than 0, multiply line 17 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment.	
20. If line 18 is greater than 0, multiply line 18 by last year's fee rate (\$/ton) and enter the result on this line. This is the overpayment.	
FEE CALCULATION	
21. Multiply line 5 (tons) by the current fee rate (\$/ton) and enter the result here.	\$2,996.46
22. Enter any underpayment from line 9 or 19 here. Otherwise enter "0."	0
23. Enter any overpayment from line 10 or 20 here. Otherwise enter "0."	0
24. If line 22 is greater than "0," add it to line 21 and enter the result here. If line 23 is greater than "0," subtract this from line 21 and enter the result here. Otherwise enter the amount on line 21 here. This is the fee adjusted for reconciliation.	\$2,996.46
25. If your account was credited for fee assessment error since the last time you paid fees, enter the amount of the credit here. Otherwise enter "0."	0
26. Subtract line 25 from line 24 and enter the result here. Stop here. This is the total fee amount that you must remit to EPA.	\$2,996.46

Attachment 2. FEE HAPS

Name of HAP	CAS No.	Identifier
Methylene Chloride	75-09-2	HAP 1
n-Hexane	110-54-3	HAP 2
1,2-Dichloroethane	107-06-2	HAP 3
Trichloroethene	79-01-6	HAP 4
Toluene	108-88-3	HAP 5
Tetrachloroethene	127-18-4	HAP 6
Ethylbenzene	100-41-4	HAP 7
m-Xylene	108-38-3	HAP 8
p-Xylene	106-42-3	HAP 9
o-Xylene	95-47-6	HAP 10
Cumene	98-82-8	HAP 11
Naphthalene	91-20-3	HAP 12
4-Methyl-2-pentanone	108-10-1	HAP 13
Methanol	67-56-1	HAP 14

This data is for : 2012 (year)

Emission Unit ID	Actual Emissions (Tons/Year)													
	HAP 1	HAP 2	HAP 3	HAP 4	HAP 5	HAP 6	HAP 7	HAP 8	HAP 9	HAP 10	HAP 11	HAP 12	HAP 13	HAP 14
B10	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
P01	0.0	0.0	0.0	0.0	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
P02	0.0	0.0	0.0	0.1	3.6	0.2	0.8	0.9	0.9	0.9	0.2	0.0	0.1	0.2
P03	0.0	0.0	0.0	0.0	0.3	0.2	0.0	0.1	0.1	0.1	0.0	0.0	0.0	0.0
P04	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Subtotals	0.0	0.0	0.0	0.1	4.1	0.6	0.8	1.0	1.0	1.0	0.2	0.0	0.1	0.2



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Federal Operating Permit Program (40 CFR Part 71)

FEE FILING FORM (FF)

Complete this form each time you prepare form **FEE** and send this form to the appropriate lockbox bank address, along with full payment. This form required at time of initial fee payment, and thereafter, when paying annual fees.

Source or Facility Name G & K Services, Inc.

Source Location 800 Isbell Street, Green Bay, WI 54303

EPA Region where Source Located EPA Region 5

Mailing Address:

Street/P.O. Box 800 Isbell Street City Green Bay

State WI ZIP 54303 -

Contact Person: Douglas Krysiak Title General Manager

Telephone (920) 497 - 2509 Ext.

Total Fee Payment Remitted: \$ 2,996.46

Federal Operating Permit Program (40 CFR Part 71)

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): B01

Applicable Requirement (Describe and Cite)

PM: 0.1 gr/dscf @ 7% Oxygen for stack-vented PM emissions
40 CFR 49.125(d) (1)

Compliance Methods for the Above (Description and Citation):

Only natural gas will be burned.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): P02, P03

Applicable Requirement (Description and Citation):

PM: 0.1 gr/dscf for stack-vented PM emissions, 40 CFR 49.125(d) (3)

Compliance Methods for the Above (Description and Citation):

Washers and dryers will be operated and maintained to minimize
PM emissions.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s) NA Requirement _____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe): <u>NA</u>
First Report ___/___/___ Frequency of Submittal _____
Contents of Progress Report (describe):
First Report ___/___/___ Frequency of Submittal _____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).
Frequency of submittal <u>Annually</u> Beginning <u>02 / 14 / 2014</u>

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: X In Compliance Not In Compliance

Compliance Certification Requirements: X In Compliance Not In Compliance



Federal Operating Permit Program (40 CFR Part 71)

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): Facility-wide (B01, P01, P02, P03, and insignificant units)

Applicable Requirement (Describe and Cite)

Facility-wide VOC emissions may not exceed 39,000 pounds per month, averaged over any 12 consecutive month period. (234 tons of VOC per year) (Operation Permit 405028690-P13)

Compliance Methods for the Above (Description and Citation):

Permittee shall calculate VOC emissions for each month and shall calculate the monthly VOC emissions averaged over each 12 consecutive month period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility-wide (B01, P01, P02, P03, and insignificant units)

Applicable Requirement (Description and Citation):

Individual federal HAP emissions may not exceed 1,650 pounds per month averaged over any 12 consecutive month period. Aggregate of federal HAP emissions may not exceed 4,150 pounds per month averaged over any 12 consecutive month period.

Compliance Methods for the Above (Description and Citation):

Permittee shall calculate individual and aggregate federal HAP emissions for each month and shall calculate the monthly individual and aggregate federal HAP emissions averaged over each 12 consecutive month period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s) NA Requirement _____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe): <u>NA</u> First Report ___/___/___ Frequency of Submittal _____
Contents of Progress Report (describe): First Report ___/___/___ Frequency of Submittal _____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year). Frequency of submittal _____ Beginning ___/___/___
--

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: In Compliance Not In Compliance

Compliance Certification Requirements: In Compliance Not In Compliance



OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Botts (First) Steve
(MI) _____

Title Director of Environmental Management

Street or P.O. Box 5995 Opus Parkway

City Minnetonka State MN ZIP 55343 -

Telephone (952) 912 - 5500 Ext. _____ Facsimile (____) _____ -

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed)  _____

Name (typed) Steve Botts Date: 6/11/13





VIA UPS DELIVERY

June 14, 2013

U.S. Bank
Government Lockbox 979078
US EPA FOIA & Misc. Payments
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101
Attn: Natalie Pearsons

**RE: Part 71 Operation Permit Application Initial Fee Payment for G & K Services, Inc.,
Green Bay, Wisconsin**

Dear Ms. Pearson:

G&K Services, Inc. is submitting a Part 71 Operation Permit Application to EPA Region 5 for its industrial laundry facility located at 800 Isbell Street, Green Bay, Wisconsin 54303. This facility is located within the limits of the Oneida Tribe of Indians of Wisconsin Reservation. Attached is Fee Filing Form 5900-06 and the initial fee payment (\$2,996.46) that is required as part of the submittal of the Part 71 Operation Permit application.

If you have any questions regarding this correspondence or the Fee Filing Form and initial fee payment, please contact Brian Duffy via phone at (952) 912-5713 or via email at bduffy01@gkservices.com.

Sincerely,
G & K Services, Inc.

A blue ink handwritten signature of Steve Botts.

Steve Botts
Director of Environmental Management
(952) 912-5765
sbotts@gkservices.com

Enclosures: Part 71 Operation Permit Application Fee Filing and Form 5900-06 and G&K Services, Inc. Check #01086122

Cc: Genevieve Damico – EPA Region 5, Michael Langman – EPA Region 5, Doug Krysiak, Andrew Utrie, Lee Joniaux, Janine Wilson, Gene Bagot, Dennis Reynolds, Brian Duffy



Federal Operating Permit Program (40 CFR Part 71)

FEE FILING FORM (FF)

Complete this form each time you prepare form FEE and send this form to the appropriate lockbox bank address, along with full payment. This form required at time of initial fee payment, and thereafter, when paying annual fees.

Source or Facility Name G & K Services, Inc.

Source Location 800 Isbell Street, Green Bay, WI 54303

EPA Region where Source Located EPA Region 5

Mailing Address:

Street/P.O. Box 800 Isbell Street City Green Bay

State WI ZIP 54303 - _____

Contact Person: Douglas Krysiak Title General Manager

Telephone (920) 497 - 2509 Ext. _____

Total Fee Payment Remitted: \$ 2,996.46

INVOICE DATE	INVOICE NUMBER	DOCUMENT NUMBER	GROSS	DISCOUNT	NET
06/10/2013 090/Brenda Weiler	0610299646	1901789459	2,996.46	0.00	2,996.46
Total*****			2,996.46	0.00	2,996.46

DETACH STUB BEFORE DEPOSITING

01086122



G&K SERVICES, INC.

CORPORATE OFFICES
5995 OPUS PARKWAY
SUITE 500
MINNEAPOLIS, MN 55343
952-912-5500

Bank of America

70-2328/719 IL

06/11/2013

01086122

NET AMOUNT
\$ *****2,996.46

VOID AFTER 90 DAYS

TWO THOUSAND NINE HUNDRED NINETY-SIX USD and 46/100

PAY TO THE ORDER OF US ENVIRONMENTAL PROTECTION AGENCY
FINE & PENALTIES CINCINNATI FINANCE
CENTER
PO BOX 979077
ST LOUIS, MO 63197

[Signature]
Authorized Signature

⑈ 1086122 ⑈ ⑆ 071923284 ⑆ 8765616547 ⑈

SEE REVERSE SIDE FOR OPENING INSTRUCTIONS



G&K SERVICES, INC.

CORPORATE OFFICES
5995 OPUS PARKWAY
SUITE 500
MINNEAPOLIS, MN 55343
952-912-5500

US ENVIRONMENTAL PROTECTION AGENCY
FINE & PENALTIES CINCINNATI FINANCE
CENTER
PO BOX 979077
ST LOUIS, MO 63197