

**United States Environmental Protection Agency  
Region 5  
Air Programs Branch  
Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604**

**AFTER-THE-FACT SYNTHETIC MINOR  
AIR QUALITY CONSTRUCTION PERMIT**

Permit Number: SYN-ON-5500900021-2014-02

Issue Date: Draft

Effective Date: Draft

In accordance with the provisions of the Clean Air Act and the Federal Minor New Source Review Program in Indian Country, 40 C.F.R. §§ 49.151 – 49.161,

**G&K Services, Inc.**


is authorized to construct and operate air emissions units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

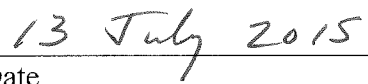
This source is authorized to construct in the following location:

**G&K Services, Inc. – Green Bay  
800 Isbell St.  
Green Bay, Wisconsin 54303**

G&K Services, Inc. – Green Bay, is located in Brown County, within the exterior boundaries of the Oneida Tribe of Indians of Wisconsin's reservation.

All terms and conditions of the permit are enforceable by the U.S. Environmental Protection Agency and citizens under the Clean Air Act.

  
\_\_\_\_\_  
Susan Hedman  
Regional Administrator  
U.S. EPA, Region 5

  
\_\_\_\_\_  
Date

### **Abbreviations and Acronyms**

BTU	British Thermal Unit
CAA	Clean Air Act
CDW	Clean Dry Weight
EPA	U.S. Environmental Protection Agency
EQ	Equalization
Facility	G&K Services, Inc. – Green Bay
G&K	G&K Services, Inc. – Green Bay
gr/dscf	Grains per Dry Standard Cubic Foot
HAP	Hazardous Air Pollutant
HVAC	Heating, Ventilation, and Air Conditioning
hr	Hour
lb	Pound
MMBTU	Millions of BTUs
MUA	Makeup Air
Permittee	G&K Services, Inc.
VOC	Volatile Organic Compound

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## **SECTION I: FACILITY DESCRIPTION**

### **(A) General Source Information**

Owner: G&K Services, Inc.  
5995 Opus Parkway  
Minnetonka, Minnesota 55343

Facility: G&K Services, Inc. – Green Bay  
800 Isbell Street  
Green Bay, Wisconsin 54303

County: Brown

Reservation: Oneida Nation of Wisconsin

SIC Code: 7218, Industrial Laundry

NAICS Code: 812332, Industrial Launderers

This after-the-fact synthetic minor construction permit establishes federally-enforceable volatile organic compound (VOC) and hazardous air pollutant (HAP) emission limits for G&K Services, Inc. – Green Bay (G&K), in Green Bay, Wisconsin. This permit also authorizes the replacement of a washing machine, three dryers, and the steam tunnel. The facility is proposing to replace the dryer units with additional modification to the exhaust stacks at the facility to accommodate the installation of heat recycling systems (heat exchangers) for the purpose of reducing natural gas usage.

G&K is located within the exterior boundaries of the Oneida Nation of Wisconsin's reservation. An industrial laundry operation, G&K cleans and reconditions soiled industrial textiles, such as towels, for customers in various industries. Its customers include businesses in the printing, wood finishing, and automotive repair industries, which send towels containing VOCs and HAPs to G&K to be washed. During the laundering process, particulate matter (PM), VOCs and HAPs in the soiled industrial towels are released. The facility operates five indoor-vented industrial washing machines, four stack-vented industrial washing machines, six natural gas-fired industrial dryers, a natural gas-fired boiler, a steam tunnel, and insignificant emission units described in Section I (B)(6) of this permit. Additionally, the facility will be installing heat exchangers on each of the dryers at the facility.

Previously, the facility obtained a construction permit from the state of Wisconsin that established emissions and operating limits below major source thresholds. However, the facility is located within the exterior boundaries of the Oneida Nation of Wisconsin's reservation. Therefore, the U. S. Environmental Protection Agency (EPA) is the permitting authority for this facility.

**(B) Emission Unit Description**

(1) Process P01 – Industrial Washers Venting Indoors

Emission Unit	EU ID	Unit Description	Exhaust Stack
Jensen #3	P36	Industrial Washing Machine	Indoors
Braun #4	P37	Industrial Washing Machine	Indoors
Ellis Split Pocket #5	P38	Industrial Washing Machine	Indoors
Ellis Split Pocket #6	P39	Industrial Washing Machine	Indoors
Unimac #1	P40	Industrial Washing Machine	Indoors
Jensen L-Tron Washer/Extractor Model 450 OPT-H	P37	Proposed replacement for Braun #4	Indoors

Table 1: Process P01 - Industrial Washers Venting Indoors

(2) Process P02 – Industrial Washers Venting to Stack S34

Emission Unit	EU ID	Unit Description	Exhaust Stack
Jensen #1	P34	Industrial Washing Machine	S34
Jensen #2	P35	Industrial Washing Machine	S34
Unimac #2	P25	Industrial Washing Machine	S34
Unimac #3	P18	Industrial Washing Machine	S34

Table 2: Process P02 - Industrial Washers Venting to Stack S34

(3) Process P03 – Industrial Dryers Burning Natural Gas

Emission Unit	EU ID	Unit Description	Heat Input Rate (MMBTU/hr)	Exhaust Stack
Challenge #3	P08	Industrial Dryer	2.75	S08
Challenge #4	P09	Industrial Dryer	2.75	S09
American #1	P30	Industrial Dryer	3.5	S30
American #2	P31	Industrial Dryer	3.5	S31
Cissell #1	P05	Industrial Dryer	0.25	S06
Cissell #2	P06	Industrial Dryer	0.25	S07
Jensen DTX 800 Dryer #1	P30	Proposed replacement for American #1	2.5	S30
Jensen DTX 800 Dryer #2	P31	Proposed replacement for American #2	2.5	S31
WashTech DR-80 Dryer	P05	Proposed replacement for Cissell #1	0.25	S06

Table 3: Process P03 - Industrial Dryers Burning Natural Gas

(4) Boiler B01 – 10.46 MMBTU Natural Gas-fired Boiler

Emission Unit	Unit Description	Burner Rating (MMBTU)	Exhaust Stack
Boiler B01	Natural gas-fired boiler	10.46	S01

Table 4: Boiler B01 - Natural Gas-fired Boiler

(5) Steam Tunnels

Emission Unit	Unit Description	Burner Rating (MMBTU/hr)
Leonard 24 foot Steam Tunnel	Steam Tunnel Dryer	0.8
Leonard Automatics Model VPT24 Steam Tunnel or a similar unit with a capacity rating up to 3.0 MMBTU/hr	Proposed steam tunnel replacing Leonard 24 foot steam tunnel	

Table 5: Steam Tunnels

(6) Miscellaneous Emission Units

In addition to the previously listed emission units, the facility also operates the following emission units and activities. These emission units either are used for one of the exempted activities as listed in 40 C.F.R. § 49.153(c), have no associated air emissions, or are already accounted for in the emission factors set forth later in this permit. They are listed here to present a complete inventory of all emission units and activities at the facility at the time this permit was issued.

- (a) 8 natural gas-fired heaters
- (b) 3 Heating, ventilation, and air conditioning units – roof
- (c) 3 Makeup air units – roof
- (d) Textile storage, staging, sorting, and counting areas
- (e) 1 water heater
- (f) Equalization tank
- (g) Continuous roll towel machine
- (h) Demineralization and oxygen scavenging of water for boilers
- (i) Fire control equipment
- (j) Fork trucks for material transport
- (k) Janitorial activities
- (l) Maintenance of grounds, equipment, and buildings
- (m) Office activities
- (n) Sanitary sewer and plumbing venting
- (o) Wastewater treatment and handling system

**(C) Permit-Specific Definitions**

- (1) “Industrial laundry operations” means all operations involved in the cleaning and reconditioning of textiles received from industrial sources. This includes all operations of the emission units in washing processes P01 and P02 and in drying process P03.
- (2) “Soiled print towels” means towels from printers, woodworking facilities, wood finishing facilities, and all other similar operations which return industrial towels containing VOCs.
- (3) “Soiled shop towels” means towels from automotive shops and other similar operations which return industrial towels containing VOCs, oil and/or grease.

**(D) Permit History**

- (1) EPA issued permit number SYN-ON-5500900021-2014-01 on November 5, 2014. The permit became effective on December 5, 2014.
- (2) This permit, number SYN-ON-5500900021-2014-02, is a revision of SYN-ON-5500900021-2014-01. This revision authorizes concurrent operation of the existing and the new steam tunnel originally authorized for construction in permit number SYN-ON-5500900021-2014-01. See Condition II(E)(6) for further information.

## **SECTION II: UNIT-SPECIFIC REQUIREMENTS**

### **(A) Process P01—Industrial Washers Venting Indoors**

- (1) Operating Restrictions [40 C.F.R. § 49.155(a)(2)]
  - (a) The Permittee shall not wash soiled print towels in any washer included in Process P01.
- (2) Monitoring [40 C.F.R. § 49.155(a)(3)]
  - (a) The Permittee shall sort and categorize soiled shop towels using the procedure established in Section III of this permit.
- (3) Recordkeeping [40 C.F.R. § 49.155(a)(4)]
  - (a) The Permittee shall maintain the following records for no less than five years:
    - (i) The weight and type of soiled shop towels washed in Process P01.

### **(B) Process P02—Industrial Washers Venting to Stack S34**

- (1) Operating Restrictions [40 C.F.R. § 49.155(a)(2)]
  - (a) The Permittee shall wash soiled print towels separately from soiled shop towels.
- (2) Monitoring [40 C.F.R. § 49.155(a)(3)]
  - (a) The Permittee shall sort and categorize soiled print and soiled shop towels using the procedure established in Section III of this permit.
- (3) Recordkeeping [40 C.F.R. § 49.155(a)(4)]
  - (a) The Permittee shall maintain the following records for no less than five years:
    - (i) The weight and type of soiled print and soiled shop towels washed in Process P02.

### **(C) Process P03—Industrial Dryers Burning Natural Gas**

- (1) Particulate Matter Limits [40 C.F.R. § 49.155(a)(2)]



- (a) Particulate matter emissions from stack S06 shall not exceed 1.64 lbs/hr.
  - (b) Particulate matter emissions from stack S07 shall not exceed 1.64 lbs/hr.
  - (c) Particulate matter emissions from stack S08 shall not exceed 7.15 lbs/hr.
  - (d) Particulate matter emissions from stack S09 shall not exceed 7.15 lbs/hr.
  - (e) Particulate matter emissions from stack S30 shall not exceed 10.72 lbs/hr.
  - (f) Particulate matter emissions from stack S31 shall not exceed 10.72 lbs/hr.
- (2) Operating Restrictions [40 C.F.R. § 49.155(a)(2)]
- (a) The Permittee shall not dry or heat any towels in any dryer unless they have first been washed in a washing machine included in process P01 or process P02.
- (3) Fuel Requirements [40 C.F.R. § 49.155(a)(2)]
- (a) Each dryer in process P03 shall burn only natural gas as a fuel.
- (4) Work Practices [40 C.F.R. § 49.155(a)(2)]
- (a) For each dryer in process P03, the Permittee shall install a lint filter (screen) in line with the exhaust stack and shall operate them at all times that each dryer is in operation.
  - (b) The Permittee shall install, operate, and replace all lint filters (screens) in accordance with the manufacturer's specifications.
- (5) Monitoring [40 C.F.R. § 49.155(a)(3)]
- (a) The Permittee shall conduct a daily visual inspection of the lint coup to ensure lint filters (screens) are installed and functioning properly.
  - (b) The Permittee shall ensure that towels are sorted and categorized in accordance with the procedures established in Section III of this permit.
- (6) Recordkeeping [40 C.F.R. § 49.155(a)(4)]
- (a) The Permittee shall maintain the following records for no less than five years:
    - (i) Daily records of visual inspection of the lint coup; and

- (ii) Date lint coup collection media for each lint filter is replaced.

**(D) Boiler B01—10.46 MMBTU Natural Gas-fired Boiler**

- (1) Fuel Requirements [40 C.F.R. § 49.155(a)(2)]
  - (a) Boiler B01 shall only use natural gas as a fuel.
- (2) Recordkeeping [40 C.F.R. § 49.155(a)(3), (4)]
  - (a) The Permittee shall maintain the following records for no less than five years:
    - (i) The amount of natural gas used as fuel for the natural gas-fired boiler each month.

**(E) Steam Tunnels**

- (1) Particulate Matter Limit [40 C.F.R. § 49.155(a)(2)]
  - (a) Particulate matter emissions from the steam tunnel shall not exceed 5.31 lbs/hr.
- (2) Fuel Requirements [40 C.F.R. § 49.155(a)(2)]
  - (a) The steam tunnel shall only use natural gas as a fuel.
- (3) Work Practices [40 C.F.R. § 49.155(a)(2)]
  - (a) The Permittee shall ensure that a lint filter is installed whenever the steam tunnel is in operation.
  - (b) The Permittee shall install, maintain, and replace the lint filters according to the manufacturer's specifications.
- (4) Monitoring [40 C.F.R. § 49.155(a)(3)]
  - (a) The Permittee shall conduct a daily visual inspection to ensure lint filters are installed and functioning properly.
- (5) Recordkeeping [40 C.F.R. § 49.155(a)(4)]

- (a) The Permittee shall maintain the following records for no less than five years:
  - (i) The amount of natural gas used by the steam tunnel each month;
  - (ii) Daily records of visual inspection of the lint filters; and
  - (iii) The date each lint filter is replaced.
- (6) Replacement Unit Concurrent Operation Authorization [40 C.F.R. § 49.155]
  - (a) The Permittee may concurrently operate the existing Leonard 24-foot Steam Tunnel and the authorized replacement steam tunnel.
  - (b) Concurrent operation of the existing steam tunnel and the replacement steam tunnel shall not exceed 6 hours per day.
  - (c) The Permittee may operate either the existing Leonard 24-foot Steam Tunnel or the authorized replacement steam tunnel independently with no restriction on daily hours of operation.
  - (d) The Permittee shall maintain the following records:
    - (i) The date construction of the replacement steam tunnel is completed.
    - (ii) The date that shakedown operations of the replacement steam tunnel is completed.
    - (iii) Hours of operation of each steam tunnel on a daily basis.
    - (iv) The number of hours of operation both steam tunnels were operating concurrently, on a daily basis.
    - (v) The throughput of the existing and replacement steam tunnel on a daily basis, in pounds soiled weight.
    - (vi) Documentation evaluating the replacement steam tunnel's performance as it relates to the new unit's commissioning and acceptance. This documentation includes, but is not limited to, parameters used to determine acceptable performance of the new steam tunnel, assessment of the replacement unit's performance, and any changes made to the steam tunnel as a result of the shakedown operations.

- (vii) The date that the existing steam tunnel is decommissioned.
- (e) The Permittee shall submit, within 30 days of the event, a notification to EPA, in writing, of the following. This notification may be sent concurrently with any notification required by this or other permits:
  - (i) The date shakedown and production testing of the replacement steam tunnel begins.
  - (ii) The date shakedown operation of the replacement steam tunnel ends. This notification shall also include the heat input, maximum throughput, and updated description of the replacement steam tunnel accepted as a result of shakedown and production testing operations.

**(F) Replacement Unit Construction Authorization and Requirements**

- (1) Replacement Unit Construction Authorization [40 C.F.R. § 49.155(a)(1)]
  - (a) The Permittee is authorized to replace the following existing emission units with the specified emission unit:

Process	Existing Emission Unit	Replacement Emission Unit
P01	Braun #4	Jensen L-Tron 450 OPT-H
P03	American #1	Jensen DTX 800 Dryer #1
P03	American #2	Jensen DTX 800 Dryer #2
P03	Cissell #1	WashTech DR-80
Steam Tunnel	Leonard 24-foot Steam Tunnel	Leonard Automatics Model VPT24 Steam Tunnel or similar unit with an input rating up to 3.0 MMBTU/hr

Table 6: Units Authorized for Replacement

- (b) The Permittee is authorized to install a heat recycling system on dryer stacks S08, S09, S30, and S31.
- (2) Replacement Unit Emission Limitations and Requirements [40 C.F.R. § 49.155(a)(2)]
  - (a) Unless otherwise stated in this permit, the Permittee shall operate each replacement emission unit in accordance with the applicable unit-specific, process-specific, facility-wide, and general requirements established in this permit.

- (b) Each replacement unit shall meet all applicable requirements at all times, including during initial operation of each replacement emission unit.
- (3) Construction Notification Requirements [40 C.F.R. § 49.155(a)(5)]
  - (a) The Permittee shall inform EPA, in writing, within 30 days of each of the following:
    - (i) The date construction commences for each authorized replacement unit;
    - (ii) The date each replacement emission unit becomes operational; and
    - (iii) The date an existing emission unit is no longer in operation.
- (4) Construction Authorization Limitations and Expiration [40 C.F.R. § 49.155(a)(1)]
  - (a) The authorization to construct replacement emission units shall apply only to the emission units explicitly identified in this construction authorization.
  - (b) The authorization to construct the replacement units shall become effective on the effective date of this permit.
  - (c) The authorization to construct the replacement units shall become invalid if construction of a replacement unit does not commence within 18 months of the effective date of this permit, if construction is discontinued for a period of 18 months or more, or if construction of all replacement units is not completed within 12 months of commencing construction. [40 C.F.R. § 49.155(b)]

### SECTION III: FACILITY-WIDE REQUIREMENTS

#### (A) Facility-wide Synthetic Minor Limitations and Requirements

##### (1) Soiled Towel Processing Limits [40 C.F.R. § 49.155(a)(2)]

- (a) The Permittee shall not process more than 1,916 thousand pounds of soiled print towels during any 12 consecutive-month period.
- (b) The Permittee shall not process more than 9,217 thousand pounds of soiled shop towels during any 12 consecutive-month period. The maximum weight of soiled shop towels that the Permittee may process during a 12 consecutive-month period will decrease depending upon the amount of soiled print towels that the Permittee processes during the same 12 consecutive-month period, as calculated in condition III.A.1.c.
- (c) At the beginning of each month, the Permittee shall comply with the following soiled shop towel processing limits:
  - (i) The Permittee shall calculate the amount of soiled shop towels that may be processed during each 12-consecutive month period using the following equation:

$$S = 9217 - 4.808 \times P$$

$S$  is the maximum amount of soiled shop towels, in thousands of pounds, that can be processed by the facility for the 12 month period ending with the current month, not to exceed 9,217 thousand pounds.

$P$  is the weight of soiled print towels, in thousands of pounds, processed by the facility during the same 12 month period, not to exceed 1,916 thousand pounds.

- (ii) The Permittee shall not process more than the calculated amount of shop towels during any 12-consecutive month period.

##### (2) Synthetic Minor Emission Limits [40 C.F.R. § 49.155(a)(2)]

###### (a) VOC Emission Limits

- (i) VOC emissions from processing soiled print towels shall not exceed 127 pounds of VOC per 1,000 pounds of soiled print towels processed.

- (ii) VOC emissions from processing soiled shop towels shall not exceed 12 pounds of VOC per 1,000 pounds of soiled shop towels processed.
  - (iii) Annual VOC emissions from soiled towel processing shall not exceed 234 tons per year, calculated on a 12-month rolling basis.
- (b) Toluene HAP Emission Limits
  - (i) Toluene emissions from processing soiled print towels shall not exceed 8.78 pounds of toluene per 1,000 pounds of soiled print towels processed.
  - (ii) Toluene emissions from processing soiled shop towels shall not exceed 1.55 pounds of toluene per 1,000 pounds of soiled shop towels processed.
  - (iii) Annual toluene emissions from soiled towel processing shall not exceed 9.9 tons per year, calculated on a 12-month rolling basis.
- (c) Tetrachloroethene HAP Emission Limits
  - (i) Tetrachloroethene emissions from processing soiled print towels shall not exceed 0.14 pounds of tetrachloroethene per 1,000 pounds of soiled print towels processed.
  - (ii) Tetrachloroethene emissions from processing soiled shop towels shall not exceed 1.75 pounds of tetrachloroethene per 1,000 pounds of soiled shop towels processed.
  - (iii) Annual tetrachloroethene emissions from soiled towel processing shall not exceed 9.9 tons per year, calculated on a 12-month rolling basis.
- (d) Total HAP Emission Limits
  - (i) HAP emissions from processing soiled print towels shall not exceed 18.79 pounds of all HAPs per 1,000 pounds of soiled print towels processed.
  - (ii) HAP emissions from processing soiled shop towels shall not exceed 4.55 pounds of all HAPs per 1,000 pounds of soiled shop towels processed.

- (iii) Annual total HAP emissions from soiled towel processing shall not exceed 24.9 tons per year, calculated on a 12-month rolling basis.

(3) Monitoring [40 C.F.R. § 49.155(a)(3)]

- (a) The Permittee shall calculate monthly and 12-month rolling VOC, single HAP, and total HAP emissions by no later than 30 days following the end of each month.
- (b) The Permittee shall calculate monthly VOC and HAP emissions from processing the soiled print and soiled shop towels, in tons, using the following equation:

$$E = \frac{(P \times EF_P + S \times EF_S)}{2000 \text{ lbs/ton}}$$

$E$  is the total monthly emissions from industrial laundry operations, in tons.

$P$  is the total weight of soiled print towels processed during the month by the facility, in 1,000 pounds.

$EF_P$  is the emission factor for soiled print towels processed by the facility, in pounds of pollutant per 1,000 pounds of soiled print towels.

$S$  is the total weight of soiled shop towels processed during the month by the facility, in 1,000 pounds.

$EF_S$  is the emission factor for soiled shop towels processed by the facility, in pounds of pollutant per 1,000 pounds of soiled shop towels.

- (c) The Permittee shall calculate emissions for each 12-consecutive-month period as a 12-month rolling sum by adding the current month's VOC emissions to the monthly emissions calculated for the previous 11 months.

(4) Recordkeeping [40 C.F.R. § 49.155(a)(4)]

- (a) The Permittee shall maintain the following records for no less than 5 years:
  - (i) The total weight of soiled print and soiled shop towels processed by the facility per month sorted by category, in 1,000 pounds;



- (ii) The allowed weight of soiled shop towels that may be processed by the facility during each 12-consecutive-month period, based upon the weight of soiled print towels processed, and supporting calculations;
    - (iii) The monthly VOC emissions, in tons;
    - (iv) The 12-month rolling sum of VOC emissions, in tons;
    - (v) The monthly toluene emissions, in tons;
    - (vi) The 12-month rolling sum of toluene emissions, in tons;
    - (vii) The monthly tetrachloroethene emissions, in tons;
    - (viii) The 12-month rolling sum of tetrachloroethene emissions, in tons;
    - (ix) The monthly total HAP emissions, in tons; and
    - (x) The 12-month rolling sum of total HAP emissions, in tons.
  - (b) The Permittee shall maintain documentation of the source and development of any emission factor used to show compliance with the synthetic minor emission limits. Examples of documentation include, but are not limited to, stack test results or other testing results.
- (5) Reporting [40 C.F.R. § 49.155(a)(5)]
- (a) The Permittee shall submit the following information to EPA annually:
    - (i) The actual weight of soiled print and soiled shop towels processed by the facility for each month;
    - (ii) The allowed weight of print and shop towels as calculated in condition III(A)(1)(c) of this permit;
    - (iii) The rolling 12-month total weights of print and shop towels processed by the facility;
    - (iv) Monthly VOC emissions from industrial laundry operations for the calendar year;
    - (v) Monthly toluene and tetrachloroethene emissions from industrial laundry operations for the calendar year;

- (vi) Monthly total HAP emissions from industrial laundry operations for the calendar year;
- (vii) 12-month rolling VOC emissions as calculated at the end of each month;
- (viii) 12-month rolling toluene and tetrachloroethene emissions as calculated at the end of each month; and
- (ix) 12-month rolling total HAP emissions as calculated at the end of each month.

**(B) Work Practices**

- (1) Soiled Towel Identification and Sorting [40 C.F.R. § 49.155(a)(2)]
  - (a) The Permittee shall develop and follow guidelines and procedures for sorting and categorizing soiled materials to be washed and dried during industrial laundry operations. At a minimum, these procedures shall document the method of classifying soiled materials as either soiled print towels, soiled shop towels, and non-VOC containing items.
- (2) Soiled Towel Storage [40 C.F.R. § 49.155(a)(2)]
  - (a) The Permittee shall develop and follow guidelines and procedures for storing soiled print and soiled shop towels to minimize fugitive VOC and HAP emissions in accordance with good work practices. Good work practices include, but are not limited to, storing soiled print and soiled shop towels in covered containers prior to sorting or washing the towels.
- (3) Recordkeeping [40 C.F.R. § 49.155(a)(4)]
  - (a) The Permittee shall maintain the guidelines and procedures for sorting and categorizing soiled materials at the facility.
  - (b) The Permittee shall maintain the guidelines and procedures for storing soiled print and soiled shop towels at the facility.
  - (c) The Permittee shall record instances when the towel identification and sorting procedure is not followed and steps taken to ensure the towels are identified and sorted according to the established guidelines and procedures.

- (d) The Permittee shall record instances when the soiled towel storage procedure is not followed and steps taken to ensure the towels are stored in accordance with good work practices.

**(C) General Recordkeeping Requirements**

- (1) The Permittee shall retain all records required in this permit for at least 5 years. [40 C.F.R. § 49.155(a)(4)(ii)]
- (2) Records required by this permit shall contain the following information [40 C.F.R. § 49.155(a)(4)(i)]:
  - (a) The location, date, and time of sampling or measurements;
  - (b) The date analyses were performed;
  - (c) The company or entity that performed the analyses;
  - (d) The analytical techniques or methods used;
  - (e) The results of such analyses; and
  - (f) The operating conditions existing at the time of sampling or measurement.

**(D) General Reporting Requirements**

- (1) The Permittee shall submit reports of monitoring required by this permit annually, by March 1<sup>st</sup> of the following year, including the type and frequency of monitoring and a summary of results obtained by monitoring. [40 C.F.R. § 49.155(a)(5)(i)]
- (2) The Permittee shall promptly report to EPA any deviation from any permit requirement, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. [40 C.F.R. § 49.155(a)(5)(ii)]
- (3) Unless otherwise defined in this permit, prompt reporting of deviations from any permit requirement means that the deviation and other required information regarding the deviation is reported to EPA within 30 days of the deviation. [40 C.F.R. § 49.155(a)(5)(ii)]

#### **SECTION IV: GENERAL PERMIT REQUIREMENTS**

##### **(A) Definitions**

Terms and conditions in this permit have the meaning assigned to them in 40 C.F.R. § 49.152 unless other regulations or statutes are referenced or applicable.

##### **(B) Issuance and Effective Date of Permit**

- (1) EPA is issuing this permit pursuant to 40 C.F.R. §§ 49.151-49.161.
- (2) This permit shall become effective on the date of signature by the Regional Administrator, EPA, Region 5.

##### **(C) Construction Without a Permit**

If the Permittee constructs or operates any source or modification not in accordance with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement actions.

##### **(D) Construction Approval**

- (1) Nothing in this permit shall alter the requirement for the Permittee to obtain a construction permit before commencement of construction or modification of an emission unit.
- (2) Approval for construction or installation shall not relieve the Permittee of the responsibility to comply fully with the applicable provisions of any other requirements of federal law or regulation, including Title V of the CAA.
- (3) The Permittee is responsible for submitting a timely application for a federal Title V operation permit to authorize continued operation of the subject emission units.

##### **(E) Compliance with Permit Requirements**

- (1) The Permittee shall comply with each term and condition in this permit. Failure to comply with any term or condition of this permit constitutes a violation of the permit, and may constitute a violation of the CAA and serve as grounds for:
  - (a) An enforcement action under Section 113 of the CAA; or
  - (b) Termination, revocation and reissuance, or modification of this synthetic minor permit.

- (2) It is not a defense in an enforcement action for violation of this permit that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**(F) Prohibition on Violation of National Ambient Air Quality Standards and Prevention of Significant Deterioration Increments**

The emission units subject to this construction permit must not cause or contribute to a violation of any National Ambient Air Quality Standard or to a violation of a Prevention of Significant Deterioration increment.

**(G) Submittals**

- (1) Unless otherwise directed by EPA or this permit, the Permittee shall submit a copy of all test plans, reports, certifications, notifications, and other information pertaining to compliance with this permit to:

Air Enforcement and Compliance  
Assurance Branch (AE-17J)  
Air and Radiation Division  
EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- (2) The Permittee shall submit permit applications, applications for permit amendments, and other applicable permit information, which includes but is not limited to applications and information regarding installation of control equipment, replacement of an emissions unit, requests for changes that contravene permit terms, and reports required by this permit to:

Air Permits Section  
Air Programs Branch (AR-18J)  
EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**(H) Severability**

The terms and conditions in this permit are distinct and severable. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of this permit. If any term or condition in this permit is held invalid, such invalidity shall not affect the validity or application of other terms or conditions.

**(I) Entry and Inspection**

- (1) Upon presentation of proper credentials, the Permittee shall allow a representative of the EPA to:
  - (a) Enter upon the premises where a source is located or emissions-related activity is conducted or where records are required to be kept under the conditions of the permit;
  - (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - (c) Inspect, during normal business hours or while the source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit;
  - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
  - (e) Record any inspection by use of written, electronic, magnetic and photographic media.

**(J) Circumvention**

The Permittee shall not build, erect, install, or use any article, machine, equipment, or process, the use of which conceals any emission which would otherwise constitute a violation of an applicable standard.

**(K) Reservation**

This permit does not convey any property rights of any sort or any exclusive privilege.

**(L) Permit Revision, Reopening, Revocation and Reissuance, or Termination**

- (1) EPA may revise, reopen, revoke and reissue, or terminate this permit for cause.
- (2) The filing by the Permittee of a request for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- (3) The Permittee shall furnish, within a reasonable time, any information that EPA may request in writing to determine whether cause for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. For any such information claimed to be confidential, the Permittee must also submit a claim of confidentiality in accordance with 40 C.F.R. Part 2, Subpart B.