

FEB 19 2015



VIA UPS DELIVERY

February 18, 2015

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

RE: Request for Revision of the Part 49 Construction Permit and Part 71 Operation Permit for G & K Services, Inc., Green Bay, Wisconsin

Dear Mr. Langman:

As you are aware, G&K Services is actively working on equipment replacement as authorized under our Part 49 Construction Permit. Detail planning is now underway for our Steam Tunnel replacement project. The proposed Steam Tunnel incorporates new, innovative technology for our industry, and represents a first of its kind application for industrial laundries. This system is intended to improve productivity and if demonstrated successfully, will reduce overall natural gas use across the garment and other textile reconditioning process on a per unit basis.

Because of the complexities and uniqueness of this installation, a phased implementation that includes testing will be required. Because of the phased implementation, we are unable to turn off the existing equipment and immediately startup the new equipment. To that end, G&K Services is requesting revisions to its Part 49 Construction Permit and its Part 71 Operation Permit to allow a period of concurrent use of the steam tunnels to allow shakedown and production testing of the proposed Steam Tunnel approved under those permits. We anticipate that a period of no more than 90 days will be sufficient to complete an initial shakedown of the equipment and fully commission the new Steam Tunnel by means of production level test runs over a full production shift.

G&K Services envisions a demonstration process that will initially involve only a few hours of operation per day, gradually increasing to full production demonstration over the course of an operating shift. At most, the new Steam Tunnel would operate for up to six (6) hours in any given day in which the existing unit would also operate. There may be some overlap in the operation of the existing and new units. However, it is our intention that both units would not be operating simultaneously for any extended period of time.

After final acceptance of the new Steam Tunnel by G&K Services, the existing unit will be permanently decommissioned and eventually removed from the facility. We have not determined how long after final acceptance that the existing unit would be made inoperable and/or removed from the facility.

Potential to Emit (PTE)

If the proposed Steam Tunnel, were to be operated currently with the existing unit, the potential emissions can be summarized as follows:

	Potential to Emit (tons per year) for the new Steam Tunnel	Facility Total Potential to Emit (tons per year) with Concurrent Operation of the existing and proposed Steam Tunnel
GHG (CO ₂ e)	1,538.7	18,905.1
PM	27.23	218.7
PM10	27.23	218.7
PM2.5	27.23	218.7
NOx	2.19	26.4
SO2	0.01	0.1
VOC	0.07	122.5
Lead (Pb)	0.0000064	0.00008
Single HAP	0.000048	8.41
Total HAP	0.024	21.2

As noted above, even if the existing Steam Tunnel remains in operation with no restrictions on its emission rate and no restriction on the emission rate of the proposed Steam Tunnel, facility-wide potential emissions will remain at less than Major Source thresholds. As noted, however, the actual use of the new Steam Tunnel will be restricted during the commissioning period, until the unit has been demonstrated to be acceptable, at which time the existing unit will be decommissioned. We are therefore, willing to limit use such that no increase or a small, insignificant increase can be accommodated. If feasible, we ask that this change be allowed under 40 CFR §49.159(f).

Please advise me or Brian Duffy at 952-912-5713 or email at bduffy01@gksservices.com of any additional steps we may need to take or if you have any questions regarding this request for revision.

Sincerely,
G & K Services, Inc.



Steve Botts
Director of Environmental Management
(952) 912-5765

Cc: Genevieve Damico
Doug Krysiak
Andrew Utrie
Lee Joniaux
George Hoyos
Gene Bagot
Dennis Reynolds
Tony Nagel
Tim Stuewer
Brian Duffy

Langman, Michael

From: Brian Duffy <bduffy01@gksservices.com>
Sent: Thursday, March 26, 2015 4:27 PM
To: Langman, Michael
Cc: Douglas Krysiak; Andrew Utrie; Lee Joniaux; George Hoyos; Sara Ethier; Stephen Botts; Dennis Reynolds; Timothy Stuewer; Seitz, David; Tony Nagel
Subject: G&K Services, In. - Green Bay: Comments on Pre-Draft Part 49 Construction Permit Revision

Michael:

As a follow-up to our recent conversations, the following are G&K's comments relative to the pre-draft Part 49 Construction Permit revision:

1. We are requesting that the following language or similar be incorporated into the permit as item (6)(f) on page 12:

If, at the end of the 90 day shakedown period, the replacement steam tunnel is not adequately operational, Permittee shall be allowed to operate the existing steam tunnel as long as Permittee physically disconnects the replacement steam tunnel such that it cannot operate. Permittee will then have to re-apply for permission for another or different shakedown period or other alternative permission to operate the replacement steam tunnel. Such permission shall be subject to all appropriate permit modification procedures.

2. Item (6)(d)(v); Please replace the wording "...in pounds CDW." with the wording "... in pounds soiled weight". CDW (clean dry weight) is not recorded during the processing of textiles. Only the respective soiled weights of the textiles as received are recorded and documented. Soiled weights are used in the various calculations for air emissions from the plant. CDW is employed by equipment manufacturers to rate the capacity of washers and dryers used in the laundering business.
3. Item (6)(c); Please insert language into this condition that clarifies that the facility after operating the two steam tunnels concurrently for 6 hours or less per day is allowed to operate either the new or existing tunnel alone for up to 18 hours per day if needed during the shakedown period.
4. Item (6)(b); Please consider inserting language into this section that clarifies completion of construction.

Please call me with any questions that you may regarding these comments or if you need any additional information. We appreciate the opportunity to review this pre-draft revision prior to the Public Comment Period.

Thank you.

Brian

Brian Duffy
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Corporate Environmental Management Department
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MEMORANDUM

DATE: June 30, 2015

SUBJECT: Summary of April 21, 2015, G&K Services Call

FROM: Michael Langman, Environmental Scientist
Air Permits Section, Air Programs Branch

TO: Permit Record.

On April 21, 2015, Brian Duffy of G&K Services, Inc., called regarding the part 49 revision requested on February 18, 2015, and to comments made on the draft part 49 permit revision permit language on March 26, 2015. Specifically, G&K Services wanted to discuss how to address its comment on the pre-draft permit regarding extending the 90-day shakedown period. In order to address the potential issue where the replacement steam tunnel is not adequately operational, G&K Services suggested that they be allowed to operate both steam tunnels for up to 6 hours per day for longer than 90 days.

To accommodate the request, the permit language has been modified to allow the steam tunnels to operate concurrently for 6 hours per day while also allowing the source to operate either the existing or the replacement steam tunnel separately for the remainder of the day. The permit incorporates additional recordkeeping to ensure that the number of hours both steam tunnels operated are recorded. Updated emissions calculations are included in the review document showing that operating both steam tunnels concurrently in this manner will not exceed the major source threshold for particulate matter. VOC and HAP emissions are unaffected since the facility's capability to process soiled towels is restricted based on soiled towel weight.