



Louisville Metro Air Pollution Control District
 701 West Ormsby Avenue
 Louisville, Kentucky 40203-3137



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1495-16-F

Plant ID: 1495

Effective Date: 2/28/2014

Expiration Date: 2/28/2019

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Owner/Source: G&K Services Co.
 1200 Maple Street
 Louisville, Kentucky 40210

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	PM ₁₀	VOC	Total HAP	Single HAP
Tons/year:	<25	< 25	< 12.5	< 5.0

Application No.: 33453, 74023 Application Received: 08/28/2013, 10/21/2015

Permit Writer: Emily Tyler

Date of Public Notice: 01/28/2014, 04/21/2016

{Manager1}
 Air Pollution Control Officer
 {date1}

TABLE OF CONTENTS

FEDOOP Permit Revisions/Changes..... 3

Construction Permit History: 3

Abbreviations and Acronyms 4

Preamble 5

General Conditions 6

Emission Unit U1: Industrial Laundry Facility 10

 U1 Applicable Regulations: 10

 U1 Equipment: 10

 U1 Control Devices: 11

 U1 Specific Conditions 12

Insignificant Activities 20

Source Comment..... 21

Fee Comment 21

FEDOOP Permit Revisions/Changes

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	33453-13-F	02/28/2014	01/28/2014	Initial	Entire Permit	Initial Permit Issuance
R1	O-1495-16-F	X/X/2016	4/21/2016	Significant Revision	U1	The revision incorporates construction permit C-1495-1000-15-F into U1 for replacement Emission Point #13 with a new 1,600 lb/hr Jensen DTX 800 3.0 MMBtu/hr dryer controlled by an external cylindrical lint trap.

Construction Permit History:

Permit No.	Issue Date	Description
C-1495-1000-15-F	11/18/2015	Replacement of Emission Point #13 with a new 1,600 lb/hr Jensen DTX 800 3.0 MMBtu/hr dryer controlled by an external cylindrical lint trap.

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as

the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the following per Regulation 2.17, section 3.5.
 - A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.

The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures

Regulation	Title
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Suite 303
701 West Ormsby Ave
Louisville, KY 40203-3137***

Emission Unit U1: Industrial Laundry Facility**U1 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permit	All
7.08	Standards of Performance for New Process Operations	1, 2, 3, and 5
7.25	Standards of Performance for New Sources Volatile Organic Compounds (VOC)	Section 3

U1 Equipment:

Emission Point	Description¹	Applicable Regulation	Control ID	Stack ID	Application Date
E3	Washer #1, Braun 600NOLUDPV 700 lb/load	2.17, 7.08, 7.25	N/A	S3	5/6/2003
E4	Washer #2, Braun 600NOLUDPV 700 lb/load		N/A	S4	5/6/2003
E13	Dryer #1, Jensen DTX800 800 lb/load		C1	S5	10/21/2015
E14	Dryer #2, Norman 2000H 600 lb/load		C2	S6	5/6/2003
E15	Dryer #3, Challenge CPG4003L 400 lb/load		C3	S7	5/6/2003
E16	Dryer #4, Challenge CP64-02-098D 400 lb/load		C4	S8	5/6/2003
IA	Dryer #5, Cissell, model L3630 300 lb/hr		N/A	N/A	5/6/2003
IA	Dryer #6, American Laundry Machine Inc., model 582 250 lb/hr		N/A	N/A	5/6/2003

¹ Maximum capacities are the manufacturers' rated capacity in pounds per load of clean dry laundry. Cycle times will vary depending on items being laundered.

U1 Control Devices:

Control ID	Description	Control Efficiency	Stack ID	Application Date
C1	External cylindrical lint trap	85%	S5	10/21/2015
C2	External cylindrical lint trap	85%	S6	5/6/2003
C3	Integral lint trap	85%	S7	5/6/2003
C4	Integral lint trap	85%	S8	12/9/2013

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)²

a. VOC

- i. The owner or operator shall not allow the plant-wide emissions of the pollutant VOC that are discharged into the atmosphere to equal or exceed 25 tons per 12 consecutive month period. (Regulation 2.17, Section 5.1)
- ii. The owner or operator shall not allow or cause the emissions of the pollutant VOC that are discharged into the atmosphere from the process of laundering shop towels and print towels to equal or exceed 22 tons per 12 consecutive month period. (BACT)(Regulation 7.25, section 2.2 and 3.1)³
- iii. The owner or operator shall launder print towels and shop towels only in washers #1 (E3) and #2 (E4) and dryers #1 (E13) and #3 (E15). (BACT)(Regulation 7.25, section 3)³
- iv. All soiled print towels and shop towels shall be received and stored in a designated area on site, shall be contained in air tight containers during receiving and storage, and shall be handled in an efficient and timely manner during the laundering process. (BACT)(Regulation 7.25, section 3)³
- v. The owner or operator shall perform, at a minimum, the proper and routine maintenance to ensure proper operation of the washers, dryers and wastewater pretreatment equipment and related processes. (BACT) (Regulation 7.25, section 3)⁴

² On 8/27/13, the source requested plant-wide limits of the criteria pollutant PM₁₀ < 25 tpy, VOC < 25 tpy, Total HAPs < 12.5 tpy, and largest single HAP < 5.0 tpy to be FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

³ The BACT plan submitted by the company on 12/12/11, designated two washers and two dryers as the only plant equipment that would be laundering print and shop towels; a laundering limit of print towels and of shop towels; storage of print and shop towels in a designated area of the plant and in air tight containers; efficient sorting and handling of the print towels at each state of laundering; and proper maintenance and operation of the washers and wastewater pretreatment equipment and related processes. The BACT plan analysis was based on an estimated 22.0 tpy emissions of the pollutant VOC.

⁴ Routine inspections and preventative maintenance shall be performed as scheduled in the correspondence received from the company 8/29/11, as additional information to the proper maintenance and operation of the washers and wastewater pretreatment equipment and related processes listed in the BACT review.

b. **HAPs⁵**

- i. The owner or operator shall not allow the plant-wide emissions of the pollutant Total HAPs to equal or exceed 12.5 tons per 12 consecutive month period. (Regulation 2.17, Section 5.1)
- ii. The owner or operator shall not allow the plant-wide emissions of any single HAP to equal or exceed 5 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)

c. **PM/PM₁₀**

- i. The owner or operator shall not allow the plant-wide emissions of the pollutant PM₁₀ to equal or exceed 25 tons per 12 consecutive month period. (Regulation 2.17, Section 5.1)⁴
- ii. For Emission Point #13 Dryer #1 at 1,600 lb/hr rated capacity, when processing non-print and non-shop towels:

The owner or operator shall operate the dryer, so that the emissions of the pollutant PM emitted from the dryers, does not equal or exceed 3.13 lb/hr per dryer. (Regulation 7.08, section 3.1.2)⁶

- iii. For Emission Point #14 Dryer #2 at 1,200 lb/hr rated capacity, when processing non-print and non-shop towels:

The owner or operator shall operate the dryer, so that the emissions of the pollutant PM emitted from the dryers, does not equal or exceed 2.62 lb/hr per dryer. (Reg. 7.08, section 3.1.2)⁷

- iv. For Emission Points #15 Dryer #3 and Emission Point #16 Dryer #4 at 800 lb/hr rated capacity, when processing non-print and non-shop towels:

The owner or operator shall operate the dryer, so that the emissions of the pollutant PM emitted from the dryers, does not equal or exceed 2.34 lb/hr per dryer. (Reg. 7.08, section 3.1.2)⁸

⁵ On 8/27/13, the source requested plant-wide limits of the criteria pollutant PM₁₀ < 25 tpy, VOC < 25 tpy, Total HAPs < 12.5 tpy, and largest single HAP < 5.0 tpy to be FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.

⁶ A one-time compliance demonstration was performed on 10/26/2015, for Dryer #1 and the lb/hr PM standards cannot be exceeded controlled. Therefore, the permit contains requirements to show compliance with the lb/hr PM emission standards during control device bypasses.

⁷ A one-time compliance demonstration was performed on 7/8/2008, for #2 and the lb/hr PM standards cannot be exceeded controlled. Therefore, the permit contains requirements to show compliance with the lb/hr PM emission standards during control device bypasses.

⁸ A one-time compliance demonstration was performed on 7/8/2008, for Dryers #3 & #4 and the lb/hr PM standards cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, or reporting requirements.

- v. For Insignificant Activities Dryer #5 (300 lb/hr) and Dryer #6 (250 lb/hr):

The owner or operator shall operate the dryer, so that the emissions of the pollutant PM emitted from the dryers, does not equal or exceed 2.34 lb/hr per dryer. (Reg. 7.08, section 3.1.2)⁹

d. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed twenty percent (20%) opacity. (Regulation 7.08, section 3.1.1)

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)¹⁰

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

- i. The owner or operators shall record monthly, in pounds of soiled laundry, the monthly total and the 12 consecutive month period total of VOC containing print towels laundered at the facility.
- ii. The owner or operator shall record monthly, in pounds of soiled laundry, the monthly total and the 12 consecutive month period total of VOC containing shop towels laundered at the facility.
- iii. The owner or operator shall calculate and record, during the first week of the following month, the monthly total and the 12 consecutive month period total emissions for the pollutant VOC in tons, to verify compliance with the process standard of 22 tons per 12 consecutive month period, using the monthly totals of soiled VOC containing print towels and shop towels laundered.
- iv. The owner or operator shall use the below listed VOC emission factors, submitted in the CY2009 test data, along with the monthly amounts of print towels laundered, section S2.a.i, and shop towels laundered, section S2.a.ii, when calculating the emissions for the pollutant VOC, or other emission factors that become available, as approved by District.

⁹ A one-time compliance demonstration was performed on 7/8/2008, for Dryers #5 & #6 and the lb/hr PM standards cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, or reporting requirements.

¹⁰ VOC and HAP emission factors were obtained from the test results of tests performed in CY2009 on a similar facility in Manchester, NH, and controlled PM/PM₁₀ emission factors were obtained from test data from CY2000 tests at the Green Bay, WI facility, received by District on 6/28/11. Uncontrolled PM/PM₁₀ emission factors were obtained from mass balancing testing at the Louisville G&K facility

Laundered Item	VOC Emission Factor
Print towels	103.8 lb/1,000 lb soiled print towels
Shop towels	9.5 lb/1,000 lb soiled shop towels

- v. The owner or operator shall calculate and record, during the first week of the following month, the monthly total and the 1) consecutive month period total plant-wide emissions of the pollutant VOC in tons, to insure it does not exceed the plant-wide standard of 25 tons per 12 consecutive month period, using emission factors as approved by District.
- vi. The owner or operator shall maintain, at a minimum, records of the routine maintenance and inspections performed on the equipment and repairs performed on the washers, dryers and wastewater pretreatment equipment, to insure the proper operation of the equipment as designed.

b. HAPs

- i. The owner or operator shall calculate and record, during the first week of the following month, the plant-wide monthly total and the plant-wide 12 consecutive month period total emissions of Total HAPs in tons, using emission factors as approved by District.
- ii. The owner or operator shall calculate and record, during the first week of the following month, the plant-wide monthly total and the plant-wide 12 consecutive month period total emissions of the largest single HAP, Xylene, in tons, using emission factors as approved by District.
- iii. The owner or operator shall use the below listed Total HAP emission factors obtained from the CY2009 test data, along with the monthly amounts of print towels laundered, section S2.a.i, and shop towels laundered, section S2.a.ii, to be included with the other on-site emissions, when calculating the plant-wide emissions for the pollutant Total HAPs, or other emission factors that become available, as approved by District.

Laundered Item	Total HAPs Emission Factor
Print towels	10.10 lb/1,000 lb soiled print towels
Shop towels	1.05 lb/1,000 lb soiled shop towels

- iv. The owner or operator shall use the below listed Xylene emission factors obtained from the CY2009 test data, along with the monthly amounts of print towels laundered, section S2.a.i, and shop towels laundered, section S2.a.ii, to be included with the other on-site emissions, when calculating the plant-wide emissions for the pollutant largest single HAP, or other emission factors that become available, as approved by District.

Laundered Item	Xylene Emission Factor
Print towels	6.32 lb/1,000 lb soiled print towels
Shop towels	0.19 lb/1,000 lb soiled shop towels

c. **PM/PM₁₀**

- i. The owner or operator shall record monthly, in pounds of soiled laundry, the monthly amount of each type of items laundered at the facility and the 12 consecutive month period totals of each type of items laundered at the facility.
- ii. The owner or operator shall calculate and record, during the first week of the following month, the monthly total and the 12 consecutive month period plant-wide emissions of the pollutant PM₁₀ in tons.
- iii. For Emission Point #13 Dryer #1 at 1,600 lb/hr and Emission Point #14 at 1,200 lb/hr:
 - 1) The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.
 - 2) If there is any time that the control device is bypassed or not in operation when the process is operating for Emission Point #13 Dryer #1 and/or Emission Point #14 Dryer #2 then the owner or operator shall keep a record of the following for each bypass event:
 - (a) Date;
 - (b) Start time and stop time;
 - (c) Identification of the control device and process equipment;
 - (d) PM emissions in the lb/hr during the bypass;
 - (e) Summary of the cause or reason for each bypass event;
 - (f) Corrective action taken to minimize the extent or duration of the bypass event; and
 - (g) Measures implemented to prevent recurrence of the situation that resulted in the bypass event.
- iv. The owner or operator shall use the below listed PM/PM₁₀ emission factors, along with the monthly amounts of each item laundered, per section S2.c.i, to be included with other on-site emissions, when calculating the plant-wide emissions for the pollutant PM/PM₁₀, or other emission factors that become available, as approved by District.

Laundered Item	PM/PM ₁₀ Dryer Emission Factors	
	Uncontrolled	Controlled
Print towels	0.002287 lb/lb soiled textile	0.0008 lb/lb soiled textile
Shop towels	0.002287 lb/lb soiled textile	0.001 lb/lb soiled textile
Garments	0.002287 lb/lb soiled textile	0.0003 lb/lb soiled textile
Mats	0.002287 lb/lb soiled textile	0.0002 lb/lb soiled textile
Mops	0.002287 lb/lb soiled textile	0.0019 lb/lb soiled textile
Other Towels	0.002287 lb/lb soiled textile	0.0003 lb/lb soiled textile

d. Opacity

- i. The owner or operator shall inspect the lint filters at each dryer at least monthly to insure proper installment and operation, and record the results. (i.e. proper alignment, placement, gap, cleanliness, etc., and replace as needed)
- ii. The owner or operator shall conduct a monthly 1-minute visible emissions survey, during normal operation, of the emission point. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure. The emission points to be surveyed shall include, but not be limited to, the emissions points listed below:
 - 1) Dryer exhaust stacks
 - 2) Dryer lint traps
 - 3) Dryer exhaust ducts
- iii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 test, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iv. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

S3. Reporting (Regulation 2.17, section 5.2)**a. VOC**

- i. The owner or operator shall report annually the monthly 12 consecutive month period totals in tons of the plant-wide emissions of the pollutant VOC.
- ii. The owner or operator shall report annually the monthly 12 consecutive month period totals in tons the print towel and shop towel laundering process emissions of the pollutant VOC.

b. HAPs

- i. The owner or operator shall report annually the monthly 12 consecutive month period totals in tons the plant-wide emissions of the pollutant Total HAP.
- ii. The owner or operator shall report annually the monthly 12 consecutive month period totals in tons of the plant-wide emissions of the pollutant largest single HAP.

c. PM/PM₁₀

- i. The owner or operator shall report annually the monthly 12 consecutive month period totals in tons of plant-wide emissions of the pollutant PM₁₀.
- ii. The owner or operator shall report the following information regarding PM By-Pass Activity in the annual compliance reports for Emission Point #13 Dryer #1 and/or Emission Point #14 Dryer #2:
 - 1) Number of times the PM vent stream by-passes the control device and is vented to the atmosphere;
 - 2) Duration of each bypass to the atmosphere;
 - 3) Calculated pounds per hour PM emissions for each by-pass; or
 - 4) A negative declaration if no by-passes occurred.

d. Opacity

The owner or operator shall report the following information regarding visual filter inspections for each dryer in the annual compliance reports.

- i. Any inspections that were missed during the reporting period and which dryer that was associated with the missed inspections; or

- ii. A negative declaration if no inspections were missed for each dryer.

Insignificant Activities

Equipment	Quantity	PTE (tpy)	Regulation Basis
Dryer #5, Cissell, model L3630, 300 lb/hr	1	3.01 PM ₁₀	Regulation 1.02, section 1.38
Dryer #6, American Laundry Machine Inc., model 582, 250 lb/hr	1	2.50 PM ₁₀	Regulation 1.02, section 1.38
Superior, model 8-5-1000-S150-WB-G, 8.4 mmbtu/hr, natural gas fueled boiler	1	3.61 NO _x	Regulation 1.02, Appendix A
Leonard Automatics, model VTP24, 1.5 mmbtu/hr, natural gas fueled steam tunnel	1	0.64 NO _x	Regulation 1.02, Appendix A
0.2 mmbtu/hr natural gas fueled space heaters	5	0.43 NO _x	Regulation 1.02, Appendix A
0.175 mmbtu/hr natural gas fueled space heaters	2	0.15 NO _x	Regulation 1.02, Appendix A
0.125 mmbtu/hr natural gas fueled space heater	1	0.05 NO _x	Regulation 1.02, Appendix A
0.1 mmbtu/hr natural gas fueled space heaters	4	0.17 NO _x	Regulation 1.02, Appendix A
0.075 mmbtu/hr natural gas fueled space heater	1	0.03 NO _x	Regulation 1.02, Appendix A

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Source Comment

Listed below are other washers currently operating on-site that are not designated to wash VOC containing print towels and shop towels and are therefore do not emit pollutants.

Equipment	Description	Capacity
Washer #3	Make: Braun; Model Number: 400 NOLUDP; Serial Number: NOLUDPV50095179	500 lbs per batch (clean, dry textile capacity)
Washer #4	Make: Braun; Model Number: 400 NOLUDP; Serial Number: NOLUDPY40087189	500 lbs per batch (clean, dry textile capacity)
Washer #5	Make: Braun; Model Number: 400 NEUTO/P; Serial Number: NOLUDP40085087	500 lbs per batch (clean, dry textile capacity)
Washer #6	Make: Braun; Model Number: 200 NOLUDPV; Serial Number: NOLUDPV20088053	250 lbs per batch (clean, dry textile capacity)
Washer #7	Make: Braun; Model Number: 400 NOLUDPV; Serial Number: NOLUDPV40089392	500 lbs per batch (clean, dry textile capacity)
Washer #8	Make: Braun; Model Number: 400 OLUDPV; Serial Number: NOLUDPV40089391	500 lbs per batch (clean, dry textile capacity)
Washer #9	Make: Milnor; Model Number: 4202606J; Serial Number: AAS/6564201	135 lbs per batch (clean, dry textile capacity)
Washer #10	Make: Milnor; Model: 4202606J; serial number: AAW/7100301	135 lbs per batch (clean, dry textile capacity)

Fee Comment

The Significant Permit Revision Fee for a FEDOOP is \$2,582.58 in accordance with the Schedule of Fees table, Regulation 2.08, section 12.9.6. This fee shall be paid to the District prior to the issuance of the revised operating permit.