

US EPA ARCHIVE DOCUMENT

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

**AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE**

Permit Number: V-ON-5500900021-2014-01

Expiration Date: Draft

Issue Date: Draft

Effective Date: Draft

In accordance with the provisions of Title V of the Clean Air Act, 40 C.F.R. Part 71, and other applicable rules and regulations,

G&K Services, Inc.

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

This source is authorized to operate 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.

Terms and conditions have the meaning assigned to them in Part 71 unless the permit otherwise defines the terms, or references other regulations or statutes. 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

11/17/2014

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

Table of Contents

Abbreviations and Acronyms	2
Table of Contents	3
Section I: Source Identification	5
(A) General Source Information.....	5
(B) Source Emission Points.....	6
Section II: Unit-Specific Requirements	8
(A) Process P01—Industrial Washers Venting Indoors.....	8
(B) Process P02—Industrial Washers Venting to Stack S34.....	9
(C) Process P03—Industrial Dryers Burning Natural Gas.....	10
(D) Boiler B01—10.46 MMBTU Natural Gas-fired Boiler.....	12
(E) Steam Tunnels.....	13
Section III: Facility-Wide Requirements.....	15
(A) Facility-wide Synthetic Minor Limitations and Requirements.....	15
(B) Work Practices	20
(C) General Recordkeeping Requirements	21
(D) General Reporting Requirements.....	22
Section IV: Part 71 General Requirements.....	25
(A) Definitions.....	25
(B) Annual Fee Payment.....	25
(C) Compliance Statement	27
(D) Compliance Certifications	28
(E) Schedule of Compliance	29
(F) Duty to Provide and Supplement Information	29
(G) Enforceability.....	29
(H) Submissions	29
(I) Severability	30
(J) Permit Actions	30
(K) Administrative Permit Amendments.....	30
(L) Minor Permit Modifications	30
(M) Significant Permit Modifications.....	31
(N) Reopening for Cause.....	31
(O) Property Rights	31
(P) Inspection and Entry	31
(Q) Emergency Provisions	32
(R) Off Permit Changes.....	32

(S)	Permit Expiration and Renewal	33
(T)	Operational Flexibility	34
(U)	Permit Shield.....	34
(V)	Credible Evidence.....	35

SECTION I: SOURCE IDENTIFICATION

(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

Tribe/Reservation: Oneida Tribe of Indians of Wisconsin

SIC Code: 7218, Industrial Laundry

NAICS Code: 812332, Industrial Launderers

G&K Services, Inc., located within the exterior boundaries of the Oneida Tribe of Indians of Wisconsin's reservation, is an industrial laundry operation that cleans and reconditions soiled industrial textiles. 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 assorted insignificant activities.

This permit is the first federal operating permit to be issued to the facility pursuant to 40 C.F.R. Part 71. It incorporates the requirements of permit number SYN-ON-5500900021-2014-01, an after-the-fact synthetic minor construction permit issued by the U. S. Environmental Protection Agency (EPA) to G&K Services pursuant to 40 C.F.R. §§ 49.151-165.

Prior to the issuance of this permit, the facility had been operating pursuant to an operating permit erroneously issued by the Wisconsin Department of Natural Resources. However, the facility is located within the exterior boundaries of the Oneida Tribe of Indians of Wisconsin's reservation. Therefore, EPA is the permitting authority for this facility and is issuing an initial operating permit pursuant to the operating permit requirements of 40 C.F.R. Part 71.

(B) Source Emission Points

(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	3.0

Table 5: Steam Tunnels

SECTION II: UNIT-SPECIFIC REQUIREMENTS

(A) Process P01—Industrial Washers Venting Indoors

Emission Unit	EU ID	Unit Description	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

- (1) Operating Restrictions [40 C.F.R. § 71.6(a)(1)]
 - (a) The Permittee shall not wash soiled print towels in any washer included in Process P01. [SYN-ON-5500900021-2014-01 Section II:(A)(1)(a)]
- (2) Monitoring [40 C.F.R. §71.6(a)(3)(i)]
 - (a) The Permittee shall sort and categorize soiled shop towels using the procedure established in Section III of this permit. [SYN-ON-5500900021-2014-01 Section II:(A)(2)(a)]
- (3) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
 - (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.
 - (b) The Permittee shall maintain the following records for no less than five years [SYN-ON-5500900021-2014-01 Section II:(A)(3)(a)]:
 - (i) The weight and type of soiled shop towels washed in Process P01. [SYN-ON-5500900021-2014-01 Section II:(A)(3)(a)(i)]
- (4) Reporting [40 C.F.R. §71.6(a)(3)(iii)]
 - (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.

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

Emission Unit	EU ID	Unit Description	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

- (1) Operating Restrictions [40 C.F.R. § 71.6(a)(1)]
 - (a) The Permittee shall wash soiled print towels separately from soiled shop towels. [SYN-ON-5500900021-2014-01 Section II:(B)(1)(a)]
- (2) Monitoring [40 C.F.R. § 71.6(a)(3)(i)]
 - (a) The Permittee shall sort and categorize soiled print and shop towels using the procedure established in Section III of this permit. [SYN-ON-5500900021-2014-01 Section II:(B)(2)(a)]
- (3) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
 - (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.
 - (b) The Permittee shall maintain the following records for no less than five years [SYN-ON-5500900021-2014-01 Section II:(B)(3)(a)]:
 - (i) The weight and type of soiled print and soiled shop towels washed in Process P02. [SYN-ON-5500900021-2014-01 Section II:(B)(3)(a)(i)]
- (4) Reporting [40 C.F.R. § 71.6(a)(3)(iii)]
 - (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.

(C) Process P03—Industrial Dryers Burning Natural Gas

Emission Unit	EU ID	Unit Description	Heat Input (MMBTU/hr)	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

- (1) Particulate Matter Limits [40 C.F.R. § 71.6(a)(1)]
 - (a) Particulate matter emissions from stack S06 shall not exceed 1.64 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(a)]
 - (b) Particulate matter emissions from stack S07 shall not exceed 1.64 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(b)]
 - (c) Particulate matter emissions from stack S08 shall not exceed 7.15 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(c)]
 - (d) Particulate matter emissions from stack S09 shall not exceed 7.15 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(d)]
 - (e) Particulate matter emissions from stack S30 shall not exceed 10.72 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(e)]
 - (f) Particulate matter emissions from stack S31 shall not exceed 10.72 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(f)]

- (2) Operating Restrictions [40 C.F.R. § 71.6(a)(1)]
 - (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. [SYN-ON-5500900021-2014-01 Section II:(C)(2)(a)]

- (3) Fuel Requirements [40 C.F.R. § 71.6(a)(1)]
 - (a) Each dryer in Process P03 shall burn only natural gas as a fuel. [SYN-ON-5500900021-2014-01 Section II:(C)(3)(a)]
- (4) Work Practices [40 C.F.R. § 71.6(a)(1)]
 - (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. [SYN-ON-5500900021-2014-01 Section II:(C)(4)(a)]
 - (b) The Permittee shall install, operate, and replace all lint filters (screens) in accordance with the manufacturer's specifications. [SYN-ON-5500900021-2014-01 Section II:(C)(4)(b)]
- (5) Monitoring [40 C.F.R. § 71.6(a)(3)(i)]
 - (a) The Permittee shall conduct a daily visual inspection of the lint coup to ensure lint filters (screens) are installed and functioning properly. [SYN-ON-5500900021-2014-01 Section II:(C)(1)(5)(a)]
 - (b) The Permittee shall ensure that soiled towels are sorted and categorized in accordance with the procedures established in Section III of this permit. [SYN-ON-5500900021-2014-01 Section II:(C)(5)(b)]
- (6) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
 - (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.
 - (b) The Permittee shall maintain the following records for no less than five years [SYN-ON-5500900021-2014-01 Section II:(C)(6)(a)]:
 - (i) Daily records of visual inspection of the lint coup [SYN-ON-5500900021-2014-01 Section II:(C)(6)(a)(i)]; and
 - (ii) Date lint coup collection media for each lint filter is replaced. [SYN-ON-5500900021-2014-01 Section II:(C)(6)(a)(ii)]
- (7) Reporting [40 C.F.R. § 71.6(a)(3)(iii)]
 - (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.

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

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

- (1) Fuel Requirements [40 C.F.R. § 71.6(a)(1)]
 - (a) Boiler B01 shall only use natural gas as a fuel. [SYN-ON-5500900021-2014-01 Section II:(D)(1)(a)]
- (2) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
 - (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.
 - (b) The Permittee shall maintain the following records for no less than five years [SYN-ON-5500900021-2014-01 Section II:(D)(2)(a)]:
 - (i) The amount of natural gas used as fuel for the natural gas-fired boiler each month. [SYN-ON-5500900021-2014-01 Section II:(D)(2)(a)(i)]
- (3) Reporting [40 C.F.R. § 71.6(a)(3)(iii)]
 - (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.

(E) 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	3.0

- (1) Particulate Matter Limit [40 C.F.R. § 71.6(a)(1)]
 - (a) Particulate matter emissions from the steam tunnel shall not exceed 5.31 lbs/hr. [SYN-ON-5500900021-2014-01 Section II:(E)(1)(a)]
- (2) Fuel Requirements [40 C.F.R. § 71.6(a)(1)]
 - (a) The steam tunnel shall only use natural gas as a fuel. [SYN-ON-5500900021-2014-01 Section II:(E)(2)(a)]
- (3) Work Practices [40 C.F.R. § 71.6(a)(1)]
 - (a) The Permittee shall ensure that a lint filter is installed whenever the steam tunnel is in operation. [SYN-ON-5500900021-2014-01 Section II:(E)(3)(a)]
 - (b) The Permittee shall install, maintain, and replace the lint filters according to the manufacturer's specifications. [SYN-ON-5500900021-2014-01 Section II:(E)(3)(b)]
- (4) Monitoring [40 C.F.R. § 71.6(a)(3)(i)]
 - (a) The Permittee shall conduct a daily visual inspection to ensure lint filters are installed and functioning properly. [SYN-ON-5500900021-2014-01 Section II:(E)(4)(a)]
- (5) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
 - (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.

- (b) The Permittee shall maintain the following records for no less than five years [SYN-ON-5500900021-2014-01 Section II:(E)(5)(a)]:
 - (i) The amount of natural gas used by the steam tunnel each month [SYN-ON-5500900021-2014-01 Section II:(E)(5)(a)(i)];
 - (ii) Daily records of visual inspection of the lint filters [SYN-ON-5500900021-2014-01 Section II:(E)(5)(a)(ii)]; and
 - (iii) The date each lint filter is replaced. [SYN-ON-5500900021-2014-01 Section II:(E)(5)(a)(iii)]
- (6) Reporting [40 C.F.R. §71.6(a)(3)(iii)]
 - (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.

SECTION III: FACILITY-WIDE REQUIREMENTS

(A) Facility-wide Synthetic Minor Limitations and Requirements

- (1) Soiled Towel Processing Limits [40 C.F.R. § 71.6(a)(1)]
- (a) The Permittee shall not process more than 1,916 thousand pounds of soiled print towels during any 12 consecutive month period.
[SYN-ON-5500900021-2014-01 Section III:(A)(1)(a)]
- (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 Section III:(A)(1)(c).
[SYN-ON-5500900021-2014-01 Section III:(A)(1)(b)]
- (c) At the beginning of each month, the Permittee shall comply with the following soiled shop towel processing limits
[SYN-ON-5500900021-2014-01 Section III:(A)(1)(c)]:
- (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. § 71.6(a)(1)]
- (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(a)(i)]
 - (ii) VOC emissions from processing soiled shop towels shall not exceed 12 pounds of VOC per 1,000 pounds of soiled shop towels processed. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(a)(ii)]
 - (iii) Annual VOC emissions from soiled towel processing shall not exceed 234 tons per year, calculated on a 12-month rolling basis. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(a)(iii)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(b)(i)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(b)(ii)]
 - (iii) Annual toluene emissions from soiled towel processing shall not exceed 9.9 tons per year, calculated on a 12-month rolling basis. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(b)(iii)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(c)(i)]

- (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(c)(ii)]
- (iii) Annual tetrachloroethene emissions from soiled towel processing shall not exceed 9.9 tons per year, calculated on a 12-month rolling basis. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(c)(iii)]
- (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(d)(i)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(d)(ii)]
 - (iii) Annual total HAP emissions from soiled towel processing shall not exceed 24.9 tons per year, calculated on a 12-month rolling basis. [SYN-ON-5500900021-2014-01 Section III:(A)(2)(d)(iii)]
- (3) Monitoring [40 C.F.R. § 71.6(a)(3)(i)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(A)(3)(a)]
 - (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 [SYN-ON-5500900021-2014-01 Section III:(A)(3)(b)]:

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

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 1000 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. [SYN-ON-5500900021-2014-01 Section III:(A)(3)(c)]
- (4) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
- (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.
- (b) The Permittee shall maintain the following records for no less than 5 years [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)]:
- (i) The total weight of soiled print and soiled shop towels processed by the facility per month sorted by category, in 1,000 pounds [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(i)];
- (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 [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(ii)];
- (iii) The monthly VOC emissions, in tons [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(iii)];
- (iv) The 12-month rolling sum of VOC emissions, in tons [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(iv)];
- (v) The monthly toluene emissions, in tons [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(v)];
- (vi) The 12-month rolling sum of toluene emissions, in tons [SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(vi)];

- (vii) The monthly tetrachloroethene emissions, in tons
[SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(vii)];
 - (viii) The 12-month rolling sum of tetrachloroethene emissions, in tons
[SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(viii)];
 - (ix) The monthly total HAP emissions, in tons
[SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(ix)]; and
 - (x) The 12-month rolling sum of total HAP emissions, in tons.
[SYN-ON-5500900021-2014-01 Section III:(A)(4)(a)(x)]
- (c) 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.
[SYN-ON-5500900021-2014-01 Section III:(A)(4)(b)]
- (5) Reporting [40 C.F.R. § 71.6(a)(3)(iii)]
- (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.
 - (b) The Permittee shall submit the following information to EPA annually
[SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)]:
 - (i) The actual weight of soiled print and soiled shop towels processed by the facility for each month [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(i)];
 - (ii) The allowed weight of soiled print and soiled shop towels as calculated in condition III(A)(1)(c) of this permit
[SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(ii)];
 - (iii) The rolling 12-month total weights of soiled print and soiled shop towels processed by the facility [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(iii)];
 - (iv) Monthly VOC emissions from industrial laundry operations for the calendar year [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(iv)];

- (v) Monthly toluene and tetrachloroethene emissions from industrial laundry operations for the calendar year [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(v)];
- (vi) Monthly total HAP emissions from industrial laundry operations for the calendar year [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(vi)];
- (vii) 12-month rolling VOC emissions as calculated at the end of each month [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(vii)];
- (viii) 12-month rolling toluene and tetrachloroethene emissions as calculated at the end of each month [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(viii)]; and
- (ix) 12-month rolling total HAP emissions as calculated at the end of each month. [SYN-ON-5500900021-2014-01 Section III:(A)(5)(a)(ix)]

(B) Work Practices

- (1) Soiled Towel Identification and Sorting [40 C.F.R. § 71.6(a)(1)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(B)(1)(a)]
- (2) Soiled Towel Storage [40 C.F.R. § 71.6(a)(1)]
 - (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. [SYN-ON-5500900021-2014-01 Section III:(B)(2)(a)]
- (3) Recordkeeping [40 C.F.R. § 71.6(a)(3)(ii)]
 - (a) The Permittee shall comply with the recordkeeping requirements in Section III: General Recordkeeping Requirements.

- (b) The Permittee shall maintain the guidelines and procedures for sorting and categorizing soiled materials at the facility.
[SYN-ON-5500900021-2014-01 Section III:(B)(3)(a)]
 - (c) The Permittee shall maintain the guidelines and procedures for storing soiled print and soiled shop towels at the facility.
[SYN-ON-5500900021-2014-01 Section III:(B)(3)(b)]
 - (d) The Permittee shall record instances when the soiled 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. [SYN-ON-5500900021-2014-01 Section III:(B)(3)(c)]
 - (e) The Permittee shall record instances when the soiled print and soiled shop towel storage procedure is not followed and the steps taken to ensure the towels are stored in accordance with good work practices.
[SYN-ON-5500900021-2014-01 Section III:(B)(3)(d)]
- (4) Reporting [40 C.F.R. § 71.6(a)(3)(iii)]
- (a) The Permittee shall comply with the reporting requirements in Section III: General Reporting Requirements.
- (C) **General Recordkeeping Requirements** [40 C.F.R. § 49.155(a)(4), 40 C.F.R. § 71.6(a)(3)(ii)]
- (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), SYN-ON-5500900021-2014-01 Section III:(3)(C)(1)]
 - (2) The Permittee shall retain of all required monitoring data and support information for the monitoring sample, measurement, report, or application. Support information may include all calibration and maintenance records, all original strip-chart recordings, or digital records for continuous monitoring instrumentation and copies of all reports required by the permit.
 - (3) Records required by this permit shall contain the following information, as appropriate:
 - (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 [40 C.F.R. §§ 49.155(a)(5), 71.6(a)(3)(iii)]

- (1) The Permittee shall submit to EPA semiannual reports of all required monitoring each six-month reporting period from January 1 to June 30 and from July 1 to December 31, except that the first reporting period shall begin on the effective date of this permit and end on December 31. All instances of deviations from permit requirements must clearly be identified in the report. All required reports must be certified by a responsible official consistent with 40 C.F.R. § 71.5(d). [40 C.F.R. § 71.6(a)(3)(iii)(A)]
 - (a) A monitoring report under this section shall include the following:
 - (i) The company name and address;
 - (ii) The beginning and ending dates of the reporting period;
 - (iii) The emissions unit or activity being monitored;
 - (iv) The emissions limitation or standard, including operational requirements and limitations (such as parameter ranges), specified in the permit for which compliance is being monitored;
 - (v) All instances of deviations from permit requirements whether demonstrated by reference test method, monitoring, or through any other credible evidence, including those attributable to upset conditions as defined in this permit, the date on which each deviation occurred, and either the total duration of deviations indicated by such monitoring or the actual records of deviations;
 - (vi) The total time when monitoring required by this permit was not performed during the reporting period;
 - (vii) All other monitoring results, data, or analyses required to be reported by the applicable requirement; and
 - (viii) The name, title, and signature of the responsible official who is certifying to the truth, accuracy, and completeness of the report.

- (b) Any report required by an applicable requirement that provides the same information described in Section III:(D)(1)(a)(i)-(viii) shall satisfy the reporting requirement in Section III:(D)(1).
 - (c) All reports shall be submitted to EPA. The semiannual report for the reporting period ending on June 30 shall be postmarked by September 1. The semiannual report for the reporting period ending on December 31 shall be postmarked by March 1.
- (2) The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributed to malfunction, emergency or other upset conditions, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to EPA based on the following schedule [40 C.F.R. §§ 49.155(a)(5), 71.6(a)(3)(iii)(B)]:
- (a) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
 - (b) For emissions of any regulated air pollutant, excluding those listed in Section III:(D)(2)(a), that continue for more than 2 hours in excess of permit requirements, the report must be made within 48 hours.
 - (c) For all other deviations from permit requirements, the report shall be contained in the report submitted in the semiannual monitoring report described in Section III:(D)(1) of this permit.
- (3) “Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with 40 C.F.R. § 71.6(a)(3)(i) and (ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. “Deviations” includes, but is not limited to, any of the following [40 C.F.R. § 71.6(a)(3)(iii)(C)]:
- (a) A situation where emissions exceed an emission limitation or standard;
 - (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;

- (c) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by this permit; or
- (d) A situation in which an exceedance or excursion, as defined in 40 C.F.R. Part 64, occurs.

SECTION IV: PART 71 GENERAL REQUIREMENTS

(A) Definitions [40 C.F.R. § 71.2]

Terms and conditions have the meaning assigned to them in Part 71 unless the permit otherwise defines the terms, or references other regulations or statutes.

(B) Annual Fee Payment [40 C.F.R. §§ 71.6(a)(7), 71.9]

- (1) The Permittee shall pay an annual permit fee in accordance with the procedures outlined below. [40 C.F.R. § 71.9(a)]
- (2) The Permittee shall submit an annual report of its actual emissions for the preceding calendar year, a fee calculation work sheet (based on the report), and full payment of the annual fee each year. The Permittee shall submit the annual report and pay the annual fee each year on or before the anniversary date of its initial fee calculation work sheet. The anniversary date of the submission of the initial fee calculation work sheet is June 11. [40 C.F.R. § 71.9(h)(1)]

The Permittee shall submit the annual report to:

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

- (3) The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency. [40 C.F.R. § 71.9(k)(1)]
- (4) The Permittee shall send fee payment and a completed fee filing form to [40 C.F.R. § 71.9(k)(2)]:

Address for Regular Mail through U.S. Postal Service

U.S. Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center
PO Box 979078
St. Louis, Missouri 63197-9000

Address for Express Delivery

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

- (5) The Permittee shall send to the address listed in Section IV:(B)(2) of this permit an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment. The Permittee may use the fee calculation worksheet that incorporates an annual emissions report, which is required at the same time as the fee calculation worksheet by Section IV:(B)(2) of this permit and 40 C.F.R. § 71.9(h).
- (6) Basis for calculating annual fee [40 C.F.R. § 71.9(c)]:
- (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all regulated pollutants (for fee calculation) emitted from the source, including fugitive emissions by the presumptive emissions fee (in dollars/ton) in effect at the time of calculation.
- (i) “Actual emissions” means the actual rate of emissions in tons per year of any “regulated pollutant (for fee calculation)” emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit’s actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. [40 C.F.R. § 71.9(c)(6)]
- (ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data. [40 C.F.R. § 71.9(h)(3)]
- (iii) The term “regulated air pollutant (for fee calculation)” is defined in 40 C.F.R. § 71.2.
- (iv) Prior to the start of each calendar year, the EPA will revise for inflation and make available the presumptive fee amount.

- (b) The Permittee shall exclude the following emissions from the calculation of fees:
- (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tons per year [40 C.F.R. § 71.9(c)(5)(i)];
 - (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation [40 C.F.R. § 71.9(c)(5)(ii)]; and
 - (iii) The quantity of actual emissions (for fee calculation) of insignificant activities as defined in 40 C.F.R. § 71.5(c)(11)(i) or of insignificant emission levels from emissions units identified in the Permittee's application pursuant to 40 C.F.R. § 71.5(c)(11)(ii). [40 C.F.R. § 71.9(c)(5)(iii)]
- (7) The Permittee must certify the fee calculation worksheet as to truth, accuracy, and completeness by a responsible official.
- (8) The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. Emission-related data include, for example, emissions-related forms provided by EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 C.F.R. § 71.6(a)(3)(ii). [40 C.F.R. § 71.9(i)]
- (9) Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 C.F.R. § 71.9(l).
- (10) When notified by EPA of underpayment of fees, the Permittee shall remit full payment with 30 days of receipt of notification. [40 C.F.R. § 71.9(j)(1) and (2)]
- (11) If the Permittee believes that the EPA-assessed fee is in error and wishes to challenge such fee, the Permittee shall provide a written explanation of the alleged error to EPA along with full payment of the EPA assessed fee. [40 C.F.R. § 71.9(j)(3)]
- (C) Compliance Statement** [40 C.F.R. § 71.6(a)(6)]
- (1) The Permittee must comply with all conditions of this Part 71 permit. Any noncompliance with this permit constitutes a violation of the Clean Air Act and is grounds for [40 C.F.R. § 71.6(a)(6)(i)]:

- (a) Enforcement action;
 - (b) Permit termination, revocation and reissuance, or modification; or
 - (c) Denial of a permit renewal application.
- (2) Need to halt or reduce activity is not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [40 C.F.R. § 71.6(a)(6)(ii)]
- (D) Compliance Certifications [40 C.F.R. § 71.6(c)(5)]**
- (1) The Permittee shall submit annually to EPA a certification of compliance with all permit terms and conditions, including emission limitations, standards or work practices, for the reporting period from January 1 to December 31, except the first reporting period shall begin on the effective date of this permit and end on December 31. All reports shall be submitted to EPA and shall be postmarked by March 1. The compliance certification shall be certified as to the truth, accuracy, and completeness by a responsible official in accordance with Section IV:(H)(1) of this permit. The certification shall include the following [40 C.F.R. § 71.6(c)(5)]:
 - (a) Identification of each permit term or condition that is the basis of the certification;
 - (b) Identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits making a false certification or omitting material information;
 - (c) The source's compliance status with each term and condition of the permit, including whether monitoring data is continuous and whether the data or any other credible evidence shows the compliance is continuous. The certification shall identify each deviation and take it into account in the compliance certification; and
 - (d) A statement indicating the compliance status of the source with any applicable enhanced monitoring and compliance certification requirements of the Clean Air Act.

(E) Schedule of Compliance [40 C.F.R. §§ 71.5(c)(8)(iii), 71.6(c)(3)]

- (1) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.
- (2) For applicable requirements that will become effective during the permit term, the source shall comply as required by the terms of the applicable requirement.

(F) Duty to Provide and Supplement Information [40 C.F.R. §§ 71.6(a)(6)(v), 71.5(b)]

- (1) The Permittee shall furnish to EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the Permittee shall also furnish to EPA copies of records that are required to be kept pursuant to the terms of this permit, including information claimed to be confidential. Information claimed to be confidential should be accompanied by a claim of confidentiality according to the provisions of 40 C.F.R. Part 2, Subpart B.
- (2) The Permittee, upon becoming aware that it omitted from its application any relevant facts or submitted incorrect information in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued.

(G) Enforceability [40 C.F.R. § 71.6(b)]

All terms and conditions in this permit, including any provisions designated to limit a source's potential to emit, are enforceable by the EPA and citizens in accordance with the Clean Air Act.

(H) Submissions [40 C.F.R. §§ 71.5(d), 71.6, 71.9]

- (1) A responsible official of the Permittee shall certify as to the truth, accuracy, and completeness of any document required to be submitted by this permit. Such certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Except as otherwise noted, the Permittee shall submit all documents required to be submitted by this permit to:

EPA Region 5
Air and Radiation Division
Air Enforcement and Compliance Assurance Branch (AE-17J)
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 installation of control equipment, replacement of an emissions unit, fee calculation worksheets, and applications for renewals and permit modifications, to:

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

- (3) The Permittee shall submit all submittals that are required by the Acid Rain Program, 40 C.F.R. Parts 72 through 78, to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204M
Washington, DC 20460

(I) Severability [40 C.F.R. § 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

(J) Permit Actions [40 C.F.R. § 71.6(a)(6)(iii)]

EPA may modify, revoke, reopen and reissue, or terminate this permit for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 C.F.R. § 71.6(a)(6)(iii)]

(K) Administrative Permit Amendments

The Permittee may request the use of administrative permit amendment procedures for a permit revision in accordance with 40 C.F.R. § 71.7(d).

(L) Minor Permit Modifications

The Permittee may request the use of minor permit modification procedures for these modifications that meet the requirements contained in 40 C.F.R. § 71.7(e)(1).

(M) Significant Permit Modifications

The Permittee must request the use of significant permit modification procedures for those modifications that meet the requirements contained in 40 C.F.R. § 71.7(e)(3).

(N) Reopening for Cause [40 C.F.R. § 71.7(f)]

- (1) The EPA shall reopen and revise the permit prior to expiration under any of the following circumstances:
 - (a) Additional applicable requirements under the Clean Air Act become applicable to this source if the remaining permit term is three or more years.
 - (b) EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - (c) EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(O) Property Rights [40 C.F.R. § 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege. [40 C.F.R. § 71.6(a)(6)(iv)]

(P) Inspection and Entry [40 C.F.R. § 71.6(c)(2)]

- (1) Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow EPA or an authorized representative to perform the following as authorized by the Clean Air Act:
 - (a) Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Q) Emergency Provisions [40 C.F.R. § 71.6(g)]

- (1) In addition to any emergency or upset provision contained in any applicable requirement, the Permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the Permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (a) An emergency occurred and that the Permittee can identify the cause(s) of the emergency;
 - (b) The Permitted facility was at the time being properly operated;
 - (c) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit; and
 - (d) The Permittee submitted notice of the emergency to EPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the Permittee attempting to establish the occurrence of an emergency has the burden of proof.
- (3) An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(R) Off Permit Changes [40 C.F.R. § 71.6(a)(12)]

- (1) The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met:

- (a) The change is not addressed or prohibited by this permit;
 - (b) The change must comply with all applicable requirements and may not violate any existing permit term or condition;
 - (c) The change cannot be subject to any requirement of 40 C.F.R. Parts 72 through 78 or modifications under any provision of Title I of the Clean Air Act;
 - (d) The Permittee must provide contemporaneous written notice to EPA of the change, except if the change qualifies as insignificant activity under 40 C.F.R. § 71.5(c)(11). The written notice must describe the change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
 - (e) The permit shield does not apply to any change made under this provision; and
 - (f) The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.
- (S) **Permit Expiration and Renewal** [40 C.F.R. §§ 71.5(a)(1)(iii), 71.6(a)(11), 71.7(b), 71.7(c)(1)(i) and (ii), 71.8(d)]
- (1) This permit shall expire upon the earlier occurrence of the following events:
 - (a) Five years elapses from the date of issuance; or
 - (b) The source is issued a valid part 70 permit.
 - (2) Expiration of this permit terminates the Permittee's right to operate unless the Permittee has submitted a timely and complete permit renewal application at least 6 calendar months, but not more than 18 calendar months, prior to the date of expiration of this permit.
 - (3) If the Permittee submits a timely and complete permit application for renewal, consistent with 40 C.F.R. § 71.5(a)(2), but EPA has failed to issue or deny the renewal permit, then the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted pursuant to 40 C.F.R. § 71.6(f) may be extended beyond the original permit term until renewal.

- (4) If the Permittee has submitted a timely and complete application for renewal, the Permittee's failure to have a Part 71 permit is not a violation of Part 71 until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.
- (5) Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation and affected state and tribal review.
- (6) The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

(T) Operational Flexibility [40 C.F.R. § 71.6(a)(13)]

- (1) The Permittee may make changes within a permitted facility without a permit revision, provided the following conditions are met [40 C.F.R. § 71.6(a)(13)]:
 - (a) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (b) The changes do not result in emissions that exceed the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions); and
 - (c) The Permittee notifies the EPA at least 7 days in advance of the proposed changes. The written notification shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(U) Permit Shield [40 C.F.R. § 71.6(f)]

- (1) Compliance with the conditions of this permit shall be deemed compliance with any specifically identified applicable requirements as of the date of permit issuance.
- (2) Nothing in this permit shall alter or affect the following:

- (a) The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- (b) The ability of EPA to obtain information under Section 114 of the Clean Air Act; or
- (c) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the Administrator under that section.

(V) Credible Evidence [62 Fed. Reg. 8314 (February 24, 1997)]

Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee and EPA) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.