

## MEMORANDUM

**DATE:** April 19, 2012

**TO:** Richard D. Garrity, Ph.D.

**FROM:** Lora Webb           **THRU:** Diana M. Lee, P.E.  
Sterlin K. Woodard, P.E.

**SUBJECT:**    **Initial Revised Draft Construction Permit – G&K Services  
Permit No. 0571427-001-AC**

Attached is an initial Revised Draft Construction Permit No. 0571427-001-AC for G&K Services located at 3735 Corporex Park Dr., Tampa, FL. This permit is being issued for the after-the-fact construction of an industrial laundry facility. The facility primarily processes soiled shop towels, print towels, mops, and garments (materials). Materials, which are received by truck and manually sorted and placed in cloth sacks, are hung from an overhead rack where they are stored until ready to be washed. The sacks are then emptied into one of nine electrical powered washers.

When the washing cycle has finished, an operator opens the washer door and the washers automatically tilt forward and shake to unload the clean materials onto a moveable conveyor system. The conveyor system then automatically moves in front of an empty dryer and the conveyor belt unloads the materials into the dryer. There are four natural gas fired dryers that operate at a maximum temperature of 225°F. The washers, dryers, and moveable conveyor system are controlled by a computer system. The washing and drying times are calculated by the computer and vary based on the type of material that is being washed and dried.

In addition to the dryers, the facility operates a natural gas fired Leonard Automatics, Model No. Special G32, steam tunnel. Clean materials are hung on hangers and pass through a large tunnel. The tunnel uses the steam to steam the materials in lieu of manually ironing the materials. Also, the facility uses a natural gas fired, 5.23 MMBtu/Hr Cleaver Brooks, Model No. CB200125, boiler with a stack economizer to provide steam for the tunnel and to heat the water that is used in the washers.

The Draft Permit was issued on April 10, 2012. On April 18, 2012, comments were received via email from the facility. The comments and responses to the comments are included in the Technical Evaluation.

Based on our review, we recommend that the above referenced permit be issued as drafted.

LAW: 0571427-001-AC

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION

FOR

G&K Services

Hillsborough County

Construction Permit

Application Number

0571427-001-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

April 19, 2012

## I. Project Description

### A. Applicant:

Charley Kubler  
Director Environmental Management  
G&K Services  
5995 Opus Parkway Suite 500  
Minnetonka, MN 55343

### B. Engineer:

Alan J. Fandrey, P.E.  
P.E. No.: 56481  
Barr Engineering Co.  
1001 Diamond Ridge Suite 1100  
Jefferson City, MO 65109

### C. Project and Location:

For the after-the-fact construction of an industrial laundry facility. The project has been assigned NEDS Source Classification Code Nos. 3-30-001-98 for Industrial Processes, Textile Products, Miscellaneous and 3-30-001-06 for Industrial Processes, Textile Products, Miscellaneous, Drying. The Standard Industrial Code for the project is No. 72 for Personal Services. The facility is located at 3735 Corporex Park Dr., Tampa, FL, 33619. UTM Coordinates of the location are 17- 349.00E and 3100.00N.

The Draft Permit was issued on April 10, 2012. On April 18, 2012, comments were received via email from the facility. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. Where duplicative comments exist, the original response is referenced.

**Comment No. 1:** Specific Condition No. 11 requires the facility to perform VOC stack testing on one washer and one dryer. G&K Services (G&K) believes that the requirement to perform a stack test is unnecessary and places an undue financial burden on the facility. While there may be some variation to the types and concentrations of specific solvents in the soiled print and shop towels processed at the Tampa plant when compared to the soiled print and shop towels processed at the New Hampshire plant, G&K views the differences between the VOCs at each location to be insignificant with respect to emission factors and permitting parameters. However, in order to account for the potential small variation in VOC emission rates between the New Hampshire and Tampa plants, G&K requests that the VOC PTE be lowered to 80 tons/year in order to provide a sufficient margin of error to stay well below the 100 tons/year major source threshold.

**Response:** Based on G&K's comment above and their request to lower the VOC PTE from

98.7 tons/year to 80 tons/year, EPC staff agrees to remove the VOC stack testing requirement from the permit. The permittee will be required to maintain monthly records of their process, which should provide reasonable assurance that the facility will not exceed the new VOC PTE limit and also ensure that the facility stays below the VOC TV threshold. Therefore, as a result of lowering the PTE to 80 tons/year, the throughput of the print towels will be reduced to 1,510,000 pounds and the throughput of the shop towels will be reduced to 15,000,000 pounds.

**From:**

11. Test one of the washers (EU No. 001) and one of the dryers (EU No. 002) while processing print towels for VOC emissions within 90 days of issuance of this permit. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with Rule 62-297.310, F.A.C. and 40 CFR 60, Appendix A. The materials that are washed and dried during the test period shall be representative of what is normally processed at the facility. [Rules 62-4.070(3) and 62-297.310(7)(a), F.A.C.]

**To:**

11. [Reserved]

**Comment No. 2:** In the Technical Evaluation, add language to clarify that the potential to emit for PM from the dryers is based on an emission factor obtained from a stack test performed at a G&K facility located in Wisconsin. G&K suggests adding the following language: The potential to emit PM for the facility's dryers was calculated based on emission factors obtained from a stack test performed at a similar facility located in Wisconsin.

**Response:** As requested, a reference to the Wisconsin stack test will be included in the emission factor explanation in Section III. Summary of Emissions of the Technical Evaluation, which EPC staff believes is the appropriate section to reference this stack test.

**Comment No. 3:** In Section II. Rule Applicability of the Technical Evaluation, it states that the facility is subject to Rule 62-296.712, F.A.C. – Miscellaneous Manufacturing Process Operations. However, G&K is not a manufacturing facility. Please verify that this regulation applies to the facility.

**Response:** EPC staff agrees that G&K's facility in Tampa is not a manufacturing facility, however, the facility processes soiled materials through the washers and dryers resulting in clean materials. Rule 62-296.712, F.A.C. applies to methods or forms of manufacturing or processing which emit particulate matter. The drying operation is a process at G&K Services which emits PM emissions, therefore, the facility is subject to this Rule.

**Comment No. 4:** In Section III. Summary of Emissions of the Technical Evaluation, the emission factor explanation for EU No. 001 should include the emissions from the hot water heater (on), the dryer (off), the hot water heater (off). In addition, the emission factor explanation for EU No. 002 should include emissions from the dryer (on) only.

**Response:** According to the facility, the hot water heater has been removed from service. Therefore, potential emissions from the hot water heater are not included in the facility's potential emissions. In addition, Emission Unit No. 001 only includes the emissions from the washing operation, as the potential emissions from the dryer (on) and dryer (off) are included in the potential emissions listed for EU No. 002 – Dryers because EU No. 002 regulates the dryers.

**Comment No. 5:** In Section III. Summary of Emissions of the Technical Evaluation, the emission factor explanation for EU No. 002 states that emissions are based on a throughput of 18,330,000 pounds of soiled shop towels. G&K requests clarification on how this number was derived.

**Response:** In the Response to the Request for Information received January 12, 2012, G&K requested to handle 20,500,000 pounds of shop towels/year based on a soiled weight basis and 1,900,000 pounds of print towels/year based on a soiled weight basis. However, using these throughputs and the emission factors from the stack test for the washers and dryers, the facility would be a major source with respect to VOC emissions. Therefore, the throughput of shop towels was reduced to 18,330,000 pounds/year to equate to 98.7 tons/year of VOC. However, as noted in the response to Comment No. 1, the throughput of shop towels was further reduced to 15,000,000 pounds of shop towels which equates to 80 tons/year.

**Comment No. 6:** In Section III. Summary of Emissions of the Technical Evaluation, it states that the highest individual HAP is m,p-xylenes. However, tetrachloroethene is the highest emitting individual HAP.

**Response:** Based on the emission factors from Table 3-1 of the New Hampshire test and the permitted material throughputs, potential emissions for m,p-xylenes were calculated to be 4.2 tons/year whereas the potential emissions for tetrachloroethene were calculated to be 4.1 tons/year. Therefore, based on these calculations, m,p-xylenes is the highest emitting individual HAP.

In addition to the above comments, G&K requested changes to the process description to more accurately reflect the facility's operations. The suggested changes are incorporated in the process description.

#### D. Process and Controls:

G&K Services is an industrial laundry facility which primarily processes shop towels, print towels, mops, and garments (materials), although the facility may process additional types of materials. Materials are received by truck and manually sorted based on color and type of material. The materials are then placed in cloth sacks, which are hung from an overhead rack where they are weighed and temporarily stored until ready to be washed. The sacks are then emptied into one of nine washers. The washer capacities vary from 85 pounds of material per load (in clean, dry weight equivalents) to 900 pounds of material per load (in clean, dry weight equivalents). All nine washers can operate at one time if needed and each

washer can wash any type of material. Two of the washers vent outdoors through individual stacks and the remaining seven washers vent indoors. All of the washers operate on electrical power.

For the seven largest washers, when the washing cycle has finished, an operator opens the washer door and the washers automatically tilt forward and shake to unload the clean materials onto a moveable conveyor system. The conveyor system then automatically moves in front of an empty dryer and the conveyor belt loads the materials into the dryer. The two smallest washers are manually loaded and unloaded.

There are four natural gas fired dryers that operate at a maximum temperature of 225°F. Three of the dryers can process up to 700 pounds per load each (in clean, dry weight equivalents), with cycle times that vary from 25 minutes to 45 minutes, depending on the material being processed. The fourth (smallest) dryer is typically used to dry garments only although it is not limited to drying only garments. This dryer can process 125 pounds per load (in clean, dry weight equivalents) and the cycle time when drying garments is 25 minutes. The maximum temperature of this dryer when drying garments is 215°F.

The washers, dryers, and moveable conveyor system are controlled by a computer system. The washing and drying times are calculated by the computer and vary based on the type of material that is being washed and dried. The detergent for the washers is stored in 55 gallon drums and is pumped to each washer as controlled by the computer. The facility has a total of 23 comfort cooling ventilation/exhaust fans. The fans are spread throughout the warehouse and are located at ground level as well as in the ceiling.

In addition to the dryers, the facility operates a natural gas fired Leonard Automatics, Model No. Special G32, steam tunnel. Cleaned materials (typically garments) are hung on hangers and pass through a large tunnel. The tunnel uses steam from the boiler to steam the materials in lieu of manually ironing the materials. The steam tunnel can be used instead of a dryer (i.e., the wet materials are placed directly into the steam tunnel) or can be used in addition to the dryer (i.e., the materials are partially dried in the dryer and finish drying in the steam tunnel). In addition to the dryers and the steam tunnel some materials (primarily floor mats) are air dried due to their low moisture content.

Also, the facility uses a natural gas fired, 5.23 MMBtu/Hr Cleaver Brooks, Model No. CB200125, boiler with a stack economizer to provide steam for the tunnel and to heat the water that is used in the washers. The boiler does not have a backup fuel.

The boiler is exempt from 40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units” pursuant to 60.40c(a) because it has a design heat input less than 10 MMBtu/Hr. Also, the boiler is exempt from 40 CFR 63 Subpart JJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources” pursuant to 40 CFR 63.11195(e) and 40 CFR 63.11237 because it meets the definition of a gas-fired boiler. In addition, the boiler is exempt from permitting pursuant to Rule 62-210.300(3)(a)33., F.A.C. – “Fossil fuel steam generators, hot water generators, and other external combustion heating

units with heat input capacity equal to or less than 10 million Btu per hour” because the boiler is rated at less than 10.0 MMBtu/Hr and is fired on natural gas only.

The steam tunnel is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. – “Generic Emissions Unit or Activity Exemption” since it would neither emit nor have the potential to emit 5.0 tons per year or more of any regulated air pollutant other than lead and HAPs. The maximum potential emissions from the combustion of natural gas in the steam tunnel are 0.3 tons/year each of NO<sub>x</sub> and CO, 0.03 tons/year of PM, 0.02 tons/year of VOC, and 0.002 tons/year of SO<sub>2</sub>.

The potential to emit for the facility’s washers and dryers was calculated based on emission factors from a stack test performed at a similar facility located in New Hampshire and owned by G&K Services. Based on this test, VOC emissions are generated from the washing and drying of shop and print towels, whereas, PM emissions are generated from the drying of materials in the dryers, with mop drying producing the highest PM emissions on a pound of PM per pound of materials dried basis.

The facility requested to be a synthetic non-TV source for VOC emissions. Therefore, the VOC PTE was calculated at 80.0 tons/year based on the emission factors from this test and by adjusting the material usages. In addition, the PM PTE was calculated at 49.5 tons/year based on the maximum potential throughput and emission factors provided in the application.

The facility’s potential emissions, based on the New Hampshire stack test, include 4.1 tons of tetrachloroethene which is another name for perchloroethylene. 40 CFR 60 Subpart JJJ – “Standards of Performance for Petroleum Dry Cleaners” defines a petroleum dry cleaner as “as a dry cleaning facility that uses petroleum solvent in a combination of washers, dryers, filters, stills, and settling tanks”. Although the facility emits tetrachloroethene, it does not use it as a solvent in the washing process. The emissions of tetrachloroethene are due to the volatilization, during the washing process, of the solvents/chemicals that are on the soiled materials when they are received at the facility. Therefore, the facility is not subject to 40 CFR 60 Subpart JJJ.

Also, the facility is not subject to 40 CFR 63 Subpart M—“National Perchloroethylene Air Emission Standards for Dry Cleaning”. Pursuant to 40 CFR 63.321 *Dry Cleaning* is defined as the process of cleaning articles using perchloroethylene. G&K Services does not use perchloroethylene in the cleaning solvents. In addition, the facility is not subject to Rule 62-296.412, F.A.C. - Dry Cleaning Facilities. Rule 62-210.200(116), F.A.C. defines a *Dry Cleaning Facility* as a facility engaged in the cleaning of fabrics in a nonaqueous solvent by means of one or more washes in solvent, extraction of excess solvent by spinning, and drying by tumbling in an airstream. The facility’s operations and cleaning materials do not meet the definition of a dry cleaning facility.

The facility is subject to Rule 62-296.320, F.A.C. – “General Pollutant Emission Limiting Standards”. The facility is also subject to Rule 62-296.712, F.A.C. – “Miscellaneous

Manufacturing Process Operations” based on the drying process at G&K Services, which emits PM emissions.

E. Application Information:

Received on: November 9, 2011

Information Requested: December 9, 2011

Application Complete: February 6, 2012

## II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C. since the facility is a Synthetic Non-TV facility by state definition.

This project is not subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Synthetic Non-TV facility by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of particulate matter (PM) emissions and volatile organic compounds (VOC) emissions and a potential source of odor.

This project is not subject to the requirements of Rule 62-296.340, through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Volatile Organic Compounds and Nitrogen Oxides Reasonably Available Control Technology, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology – Particulate Matter, F.A.C. because the facility wide potential PM emissions are greater than fifteen tons per year and five pounds per hour and there is an applicable source specific category in this rule, specifically Rule 62-296.712, F.A.C. – Miscellaneous Manufacturing Process Operations.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is not an applicable source specific category in this rule.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

### III. Summary of Emissions

#### Potential Criteria Pollutants

Emission Unit (EU) No.	EU Description	PM (tpy)	NO <sub>x</sub> (tpy)	SO <sub>2</sub> (tpy)	CO (tpy)	VOC (tpy)	Individual HAP*	Total HAPs	Allowable	Opacity
001	Washers	--	--	--	--	29.2			--	5%
002	Dryers	49.5	3.5	0.02	2.9	50.8			--	5%
	<b>Potential to Emit</b>	<b>49.5</b>	<b>3.5</b>	<b>0.02</b>	<b>2.9</b>	<b>80.0</b>	<b>4.2</b>	<b>13.2</b>	--	--

\*The highest individual HAP is m,p-xylenes.

- For EU No. 001, the VOC emissions are based on a maximum throughput of 1,510,000 pounds of soiled print towels and an emission factor of 38.7 pounds VOC per 1,000 pounds of soiled print towels processed. The emission factor is from a stack test performed at the G&K New Hampshire facility and includes emissions from the following operations: towel wash room (day); EQ tanks (day); towel wash room (night); and EQ tanks (night). PTE emissions were based on the processing of print towels which represent the worst case for the washers.
- For EU No. 002, the VOC emissions are based on a maximum throughput of 15,000,000 pounds of soiled shop towels and an emission factor of 6.8 pounds VOC per 1,000 pounds of soiled shop towels processed. The emission factor is from a stack test performed at the G&K New Hampshire facility and includes emissions from the following operations: dryer (on) and dryer (off). PTE emissions were based on the processing of shop towels, which represent the worst case for the dryers.
- For EU No. 002, the PM emissions are based a maximum throughput of 51,876,720 pounds of soiled mops and an emission factor of 0.0019 pounds PM per pound of soiled mops processed. The emission factor (from G&K's Wisconsin facility stack test) for processing mops was provided in the application . The PM emissions from EU No. 002 also include emissions from the combustion of natural gas in the dryers.
- For EU No. 002, the NO<sub>x</sub>, SO<sub>2</sub>, and CO emissions are calculated based on the combustion of natural gas in the dryers and emission factors from AP 42 5<sup>th</sup> Edition, Ch. 1.4 – Natural Gas Combustion, Tables 1.4-1 and 1.4-2.
- The individual HAP emissions are based on a maximum throughput of 1,510,000 pounds of print towels and an emission factor of 5.6 pounds of m,p-xylene per 1,000 pounds of print towels processed. The emission factor is from the stack test performed at the G&K New Hampshire facility. PTE Emissions were based on the processing of print towels, which represent the worst case facility-wide operations.
- The total HAP emissions are based on the maximum throughput of shop or print towels, which ever represents the worst case for each HAP. The emission factor for each HAP is based on the stack test performed at the G&K New Hampshire facility.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit for the after-the-fact construction of the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

Charley Kubler  
Director Environmental Management  
G&K Services  
5995 Opus Parkway, Suite 500  
Minnetonka, MN 55343

File No.: 0571427-001-AC  
County: Hillsborough

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, G&K Services, applied on November 9, 2011 to the EPC for an after-the-fact construction of an industrial laundry facility. The facility primarily processes shop towels, print towels, mops, and garments using industrial sized washers and natural gas fired dryers. The facility, which is a Synthetic Non-Title V Source, is located at 3735 Corporex Park Dr., Tampa, Hillsborough County, FL, 33619.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the

purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner,
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
- (c) Each rule or portion of a rule from which a variance or waiver is requested,
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
- (e) The type of action requested,
- (f) The specific facts that would justify a variance or waiver for the petitioner,
- (g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the

those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

---

Richard D. Garrity, Ph.D.  
Executive Director

cc: Florida Department of Environmental Protection (via email)  
Alan Fandrey, P.E. – Barr Engineering Company (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

---

Clerk

---

Date

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY  
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP), gives notice of its intent to issue an air pollution Permit No. 0571427-001-AC to G&K Services. The applicant applied on November 9, 2011 to the EPC for an after-the-fact construction of an industrial laundry facility. The facility primarily processes shop towels, print towels, mops, and garments using industrial sized washers and natural gas fired dryers. G&K Services, which is a Synthetic Non-TV facility, is located at 3735 Corporex Park Dr., Tampa, Hillsborough County, FL, 33619.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Charley Kubler  
Director Environmental Management  
G&K Services  
5995 Opus Parkway, Suite 500  
Minnetonka, MN 55343

Re: Hillsborough County Air Permitting

Dear Mr. Kubler:

Enclosed is Permit Number 0571427-001-AC for an after-the-fact construction of an industrial laundry facility, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.  
Executive Director

RDG/LAW/law

G&K Services  
Tampa, FL 33619

Page 2 of 2

cc: Florida Department of Environmental Protection (via email)  
Alan Fandrey, P.E. – Barr Engineering Company (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

PERMITTEE:  
G&K Services  
3735 Corporex Park Dr.  
Tampa, FL 33619

PERMIT/CERTIFICATION  
Permit No: 0571427-001-AC  
County: Hillsborough  
Expiration Date: April 30, 2013  
Project: Industrial Laundry Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

This permit is being issued to authorize the after-the-fact construction of an industrial laundry facility. G&K Services is an industrial laundry facility which primarily processes soiled shop towels, print towels, mops, and garments (materials), although the facility may process additional types of soiled materials. Soiled materials are received by truck and manually sorted based on color and type of material. The soiled materials are then placed in cloth sacks, which are hung from an overhead rack where they are weighed and temporarily stored until ready to be washed. The sacks are then emptied into one of nine washers. The washer capacities vary from 85 pounds of soiled material per load (in clean, dry weight equivalents) to 900 pounds of soiled material per load (in clean, dry weight equivalents). All nine washers can operate at one time if needed and each washer can wash any soiled material, although the two smallest washers typically only are used to wash soiled garments and soiled mops. Two of the washers vent outdoors through individual stacks and the remaining seven washers vent indoors. All of the washers operate on electrical power.

For the seven largest washers, when the washing cycle has finished, an operator opens the washer door and the washers automatically tilt forward and shake to unload the clean materials onto a moveable conveyor system. The conveyor system then automatically moves in front of an empty dryer and the conveyor belt unloads the materials into the dryer. The two smallest washers are manually loaded and unloaded. There are four natural gas fired dryers that operate at a maximum temperature of 225°F. Three of the dryers can process up to 700 pounds per load each (in clean, dry weight equivalents), with cycle times that vary from 25 minutes to 45 minutes, depending on the material being processed. The fourth (smallest) dryer is typically

used to dry garments only, although it is not limited to drying only garments. This dryer can process 125 pounds per load (in clean, dry weight equivalents) and the cycle time when drying garments is 25 minutes. The maximum temperature of this dryer when drying garments is 215°F. The washers, dryers, and moveable conveyor system are controlled by a computer system. The washing and drying times are calculated by the computer and vary based on the type of material that is being washed and dried. The detergent for the washers is stored in 55 gallon drums and is pumped to each washer as controlled by the computer. The facility has a total of 23 comfort cooling ventilation/exhaust fans. The fans are spread throughout the warehouse and are located at ground level as well as in the ceiling.

In addition to the dryers, the facility operates a natural gas fired Leonard Automatics, Model No. Special G32, steam tunnel. Cleaned materials (typically garments) are hung on hangers and pass through a large tunnel. The tunnel uses steam from the boiler to steam the materials in lieu of manually ironing the materials. The steam tunnel can be used instead of a dryer (i.e., the wet materials are placed directly into the steam tunnel) or can be used in addition to the dryer (i.e., the materials are partially dried in the dryer and finish drying in the steam tunnel). In addition to the dryers and the steam tunnel some materials (primarily floor mats) are air dried due to their low moisture content.

Also, the facility uses a natural gas fired, 5.23 MMBtu/Hr Cleaver Brooks, Model No. CB200125, boiler with a stack economizer to provide steam for the tunnel and to heat the water that is used in the washers. The boiler does not have a backup fuel. The boiler is exempt from permitting pursuant to Rule 62-210.300(3)(a)33., F.A.C. – “Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour”. In addition, the steam tunnel is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. – “Generic Emissions Unit or Activity Exemption”.

Location: 3735 Corporex Park Dr., Tampa, FL, 33619

UTM: 17- 349.00E and 3100.00N

NEDS No: 1427

Emission Unit Nos.:

001 – Nine Washers

002 – Four Natural Gas Fired Dryers

Replaces Permit No.: NA

References Permit No.: NA

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
5. As requested by the permittee, in order to limit the potential to emit and establish the facility as a synthetic minor for VOC and Hazardous Air Pollutants (HAP), the following emission limitations shall apply per any twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200, F.A.C. and Construction Permit Application Received November 9, 2011]
  - A) The facility wide potential VOC emissions, including VOC emissions due to the combustion of natural gas, shall not exceed 80.0 tons/year.
  - B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons for any individual HAP and less than 25 tons for any combination of HAPs.
6. The permittee shall not cause, permit, or allow any visible emissions greater than 5 percent opacity from EU Nos. 001 and 002 or any other activity at the facility. [Rule 62-296.712(2), F.A.C.]
7. The hours of operation of the facility are not limited. [Rule 62-4.070(3), F.A.C.]
8. In order to limit the potential to emit, the following restrictions and limitations shall apply per any twelve consecutive month period in order to ensure compliance with Specific Condition No. 5: [Rule 62-4.070(3), F.A.C. and Construction Permit Application Received November 9, 2011]
  - A) The maximum combined natural gas usage of the dryers (EU No. 002) shall not exceed 69.6 million cubic feet.
  - B) The maximum amount of mops (in soiled weight equivalents) processed through the dryers shall not exceed 51,846,720 pounds.
  - C) The dryers shall burn natural gas only or be electric powered.
  - D) The washers shall be electric powered only.
9. When calculating emissions in order to demonstrate compliance with Specific Condition No. 5, the emission factors listed below for each type of material shall be used. [Rule 62-4.070(3), F.A.C. and Construction Permit Application Received November 9, 2011]

Material	Pollutant	Emission Factor for Washer	Emission Factor for Dryer
----------	-----------	----------------------------	---------------------------

Shop Towels	VOC	2.8 lb/1,000 pounds of soiled towels	6.7 lb/1,000 pounds of soiled towels
Print Towels	VOC	38.7 lb/1,000 pounds of soiled towels	64.8 lb/1,000 pounds of soiled towels
Mops	PM	N/A	0.002 lb/pound of soiled mops

10. Test one dryer (EU No. 002) for visible emissions at the point of highest opacity during the drying of mops, within 90 days of issuance of this permit and annually thereafter. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. The EPA Method 9 test for the emission units shall be a minimum of thirty (30) minutes in duration. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rule 62-297.310(4)(a)2. and (7)(a), F.A.C.]

11. [Reserved]

12. Compliance with the emission limitations of Specific Condition No. 6 shall be determined using EPA Method 9, contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3) and 62-297.401, F.A.C.]

13. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the rated capacity of drying 700 pounds (in clean, dry weight equivalents) of mops per load. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the weight of the materials processed during the test, the number of washers and dryers in operation during the test, and the temperature of the air in the dryers during the test may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

14. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

15. In order to demonstrate compliance with Specific Condition Nos. 5 and 8, the permittee shall maintain a monthly recordkeeping system. The records shall be maintained onsite for three years and shall be made available to any local, state, or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Month/Year
- B) Amount of natural gas usage combusted in the dryers
- C) Amount of soiled mops processed through the dryers (pounds)
- D) Amount of soiled print towels processed through the washers and dryers
- E) Amount of soiled shop towels processed through the washers and dryers

- F) Monthly VOC emissions from the washers
- G) Monthly VOC emissions from the dryers
- H) Rolling twelve month totals of B) through G) above

16. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following: [Rule 62-296.320(4)(c), F.A.C.]

- A) Exercise good housekeeping at all times.
- B) Remove and properly dispose of lint from the dryers on a regular basis.
- C) Limit the amount of time the garage doors are left open when unloading materials.

17. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

18. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1), F.A.C.]

- A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
- B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
- C) Immediately attend to all spills/waste as appropriate.

19. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(199), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.

20. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

21. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3)(c), F.A.C.]

22. A minimum of two copies of an air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the compliance test or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

---

Richard D. Garrity, Ph.D.  
Executive Director

**P.E. Certification Statement**

**Permittee:**  
**G&K Services**  
**Tampa, Florida**

**REVISED DRAFT Permit No.: 0571427-001-AC**  
**Facility ID No.: 0571427**

**Project Type: Air Construction**

*I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).*

(Seal)

---

Diana M. Lee, P.E.

---

Date

Permitting Authority:  
Environmental Protection Commission  
of Hillsborough County

Air Management Division  
3629 Queen Palm Dr  
Tampa, FL 33619  
Telephone: (813) 627-2600  
Fax: (813) 627-2660