Parthenon Prints, Inc.
Panama City Plant
Facility ID No.: 0050026
Bay County

Air Operation Permit
Permit No.: 0050026-006-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850.595.8300
Fax: 850.595.8096

Air Operation Permit
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Florida Department of Environmental Protection

Northwest District
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Permittee:
Parthenon Prints, Inc.

Permit No.: 0050026-006-AO
Facility ID No.: 0050026
SIC No(s).: 39, 3999
Project: Air Operation Permit

This permit is for the operation of the Panama City Plant located at 909 West 39th Street, Bay County; UTM Coordinates: Zone 16, 627.5 km East and 3343.5 km North; Latitude: 85° 40' 30" North and Longitude: 30° 13' 00" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. 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 permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: January 28, 2013
Renewal Application Due Date: November 29, 2017
Expiration Date: January 28, 2018

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

JCH/aj/c

Section I. Facility Information.

This is a renewal of Permit 0050026-004-AO, effective February 29, 2008. This permit incorporates Permit 0050026-005-AC, effective March 21, 2008, which increased the maximum fabric printing capacity from 1.0 million yards per year to 1.5 million yards per year, eliminated the loop dryer in the fabric printing process, added a fabric printing press/dryer, and reduced wallpaper screen cleaning mineral spirits (VOC emissions) from 47 TPY to 27 TPY by manual scrubbing and 1.73 TPY (VOC emissions) by eliminating the spray gun cleaner.

Subsection A. Facility Description.

This facility produces printed wallpaper and printed textile fabric by use of screen printing. Color solutions are mixed with various pigments and are subsequently transported to the printing equipment. A thin layer of glue is applied to the underside of the fabric in order to make it adhere to the equipment during the screen printing process. Screen printing is used to imprint a pattern into the textile fabric or wallpaper material. Drying, steaming and washing processes are used at various stages. Two boilers provide heat or steam to the facility. A drum dryer is used to solidify excess ink solutions. Extensive cleaning is required each time a pattern is changed, and reportedly, Parthenon Prints produces relatively small batches with a wider variety of patterns. A central scrubber/fume eliminator receives air captured and ducted from the fabric and wallpaper dryers/curers. The scrubber is manufactured by CVC Corporation, Model 80 CTR-12.

Cleaning solvents, used to clean the equipment, are the primary source of VOC and HAP emissions.

Two natural gas boilers, each under 1.0 MMBtu/hr heat input, used to provide steam for the manufacturing process, are considered exempt activities. [Rule 62-210.300(3)(a)33 F.A.C.]

The following dryers actually operate 2,000 hrs/yr and are determined to be exempt under Rule 62-210.300(3)(b)1., F.A.C.

Type	Rated Heat Input Capacity Million Btu/hr	Fuel Type
Fabric Printer/Dryer (old)	2.80	Natural Gas
Fabric Printer/Dryer (new)	4.10	Natural Gas
Fabric Tenner Dryer	9.60	Natural Gas
Wallpaper Printer/Dryer	3.36	Natural Gas

Based on the permit application received December 21, 2012, this facility is nota major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Screen Printing, Ink Drying & Equipment Cleaning

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

This document is on file with the permitting authority:
Permit Application received December 21, 2012

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. All listed Appendices are part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7)(b), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

7. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit four permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rule 62-4.090, F.A.C.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.595.8300; Fax: 850.595.8096

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 470 Harrison Ave, Panama City FL 32401.

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.8300, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Screen Printing, Ink Drying & Equipment Cleaning

Fabric Printing

A 4.1 MMBtu/hr fabric printing press/dryer, manufactured by Stork, Model RD-4 replaced the old 2.8 MMBtu/hr fabric printing press/dryer, Stork, Model RD-4, which is now used as backup, but never operates simultaneously. The fabric printing press consists of multiple rolls that add colors (dyes) on a continuous fabric roll moving along on top of a continuous rubber belt as colors are applied by rotating screens. Each rotating screen applies a different color and design. Colors used in printing are water based. A film of glue is applied to the under side of the fabric to help it stick to the rubber belt to facilitate printing.

After printing, the printed fabric enters a dryer section that is a large enclosed insulated box inside which fabric travels slowly on rollers and undergoes curing and drying. Exhaust from the dryer is ducted to the central scrubber/fume eliminator. The printed fabric is fed into a steamer (Stork HSII) for further dye fixation. No additional chemicals are added in this step. Steam is provided by a 350 Hp (0.9 MMBtu/hr) natural gas fired boiler. A 200 Hp standby boiler is also available. Emissions from the steamer and boilers are vented to the atmosphere via roof vents and conventional stacks.

The fabric then is washed in an open washer consisting of five tanks containing hot water. The final stage of the fabric process is the tenner frame that consists of a 60-foot long oven manufactured by the National Dryer Corporation. The frame has a maximum burner capacity of 9.6 MMBtu/hr and is exhausted to the atmosphere by a conventional stack. Finishes are sometimes applied to the fabric at the tenner frame.

Wallpaper Printing

The wallpaper printing machine is similar to fabric printing except the paper substrate is exposed to drying/curing process after each coating or color application. Printing/curing can be done in up to 13 stages. The first stage applies a base coat (liquid PVC), and subsequent stages apply color. All stages of drying/curing use open flame burners. Total dryer capacity is 3.36 MMBtu/hr. Every stage of the dryer is vented into a common exhaust ductwork vented into central scrubber/fume eliminator.

All colors are liquid PVC (Plastosol) based and are mixed in a wallpaper color shop by mixing liquid dyes with liquid plastosols in unvented mixers. This plant also has one custom-made wallpaper-printing machine for trial samples in small quantities. This machine uses electric heat for the drying/curing process and the dryer is vented to the existing central scrubber/fume eliminator.

Screen Cleaning and Waste Handling

Leftover colors from wallpaper printing are disposed of by process of solidifying in a steam heated drum dryer, which is hooded and connected to the central gas scrubber. Screen cleaning is accomplished with the use of mineral spirits and manual brushes.

{Permitting Note: This emissions unit is not subject to any activity- or industry-specific regulation.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity
Production or material usage shall not exceed any of the following:
a. 1.5 million yards per year on a monthly rolling basis of fabric printing.
b. 6.0 million yards per year on a monthly rolling basis of wallpaper production.
c. 54,000 pounds per year on a monthly rolling basis of mineral spirits.
[Rules 62-4.070(3), 62-210.200 (PTE), F.A.C.; Permits 0050026-002-AC and 0050026-005-AC]

A.2. Method(s) of Operation for the Scrubber/Fume Eliminator

A pressure differential gauge shall be installed across the scrubber. The pressure drop across the scrubber will be maintained in the range of 4 – 10 inches WG. [Rules 62-4.070(3), 62-210.200 (PTE), F.A.C., Permits 0050026-002-AC and 0050026-005-AC]

A.3. Method(s) of Operation for the Boilers
Fossil fuel steam generators and hot water generating units at the facility shall be exempt from permitting as long as they burn only natural gas and collectively have a rated heat capacity of 10 million Btu per hour or less. [Rules 62-4.070(3), 62-210.300(3)(a)33., F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions Limitation
Visible emissions shall be less than 20% opacity. [Rule 62-296.320(4)(b), F.A.C.]

Test Methods and Procedures

A.5. Visible Emissions. The test method for visible emissions shall be EPA test method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.]

Emissions Tests

A.6.a. Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Visible emissions of the scrubber exhaust shall be conducted for a minimum of 30 minutes when wallpaper printing is in operation. **VE tests shall be conducted for the scrubber exhaust once per permit cycle (once every five years), within 90 days prior to submission of the permit renewal application**. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C., Permit 0050026-002-AC]

A.6.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The compliance test report shall provide a general description of which processes are occurring during the VE test and shall note the actual reading from the pressure differential gauge installed on the scrubber/fume eliminator during the VE Test. The Department can require special compliance tests in

accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.
[Rules 62-297.310(7) and 62-297.620(1), F.A.C., Permit 0050026-002-AC]

A.6.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources 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, operation at higher capacities is allowed for no more than 15 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Monitoring of Operations, Recordkeeping and Reporting Requirements

A.7. Scrubber/Fume Eliminator Operations
A reading from the pressure differential gauge installed on the fume eliminator shall be recorded at least daily when the fume eliminator is in operation.
[Rule 62-4.070, F.A.C.]

A.8. VOC and HAP Emissions
Permittee shall maintain records, in a format and location suitable for inspection by the Department, which shall include as a minimum:

a. Fabric Printing Production. Production of fabric printing products shall be recorded in yards per month and yards per year on a 12-month rolling total.
b. Wallpaper Production. Production of wallpaper products shall be recorded in yards per month and yards per year on a 12-month rolling total.
c. Mineral Spirits Usage. Usage of mineral spirits shall be recorded in pounds per month and pounds per year on a 12-month rolling total.

Monthly summaries and rolling twelve-month (annual) calculations shall be certified and signed by the responsible company representative to be accurate and truthful calculated representations of actual emissions. Monthly summaries and rolling12-month calculations shall be completed and available for inspection no later than ten days following the end of the each month. These records shall be kept and maintained for at least five years, and shall be made available for Department inspection as necessary. Permittee shall install, use, and maintain appropriate systems, forms, methods, etc., to gather the necessary data. [Rule 62-4.070, F.A.C., Permits 0050026-002-AC and 0050026-005-AC, and DEP letter issued April 30, 2009]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.