TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT
Hit Promotional Products, Inc.
7150 Bryan Dairy Road
Largo, Florida 33777

Facility ID No. 1030313

PROJECT

Project No. 1030313-010-AC
Application for Minor Air Construction Permit
Project Name: Construction of Third Screen Printing Operation

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

June 7, 2012

Prepared by Danny Stubbs

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Arthur W. Schmidt, IV, President
Hit Promotional Products, Inc.
7150 Bryan Dairy Road
Largo, Florida 33777

B. Professional Engineer:

Mr. Robert E. Wallace, III, P.E.
Environmental Engineering Consultants, Inc.
5119 N. Florida Ave.
Tampa, Florida 33603

C. Project Location:

The new printing and manufacturing operations (E.U. 003) will be located at 3320 122nd Avenue, St. Petersburg, Pinellas County.

D. Project Summary:

The project is for the construction of a new silk screen printing operation (E.U. No. 003) that will consist of up to 28 various printers, 5 large dryers, 2 Debossing machines, 1 hot stamp

machine and 2 pad printing machines. This project is also for the construction of a new silk screen printing operation (E.U. No. 002) which was initially permitted in Construction Permit No. 1030313-009-AC which was issued on January 13, 2011. The inks and cleanup solvents used in the printing operation will be a source of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) that will be emitted fugitively from the facility. The facility's three printing operations combined (i.e., 7150 Bryan Dairy Road in Largo, 8226 118th Avenue North in Largo, and 3320 122nd Avenue in St. Petersburg) will have potential emissions that exceed the Title V threshold for VOC.

E. Application Information:

Application Received on: 4/27/2012
Application Complete: 4/27/2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. – Permits Required	Y	Subject to general permitting requirements.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	N	Screen printing operations is not expected to be a source of unconfined particulate matter.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Screen printing operations are a source of VOC and may be a source of odors.
Rule 62-296.401-470, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Pinellas County is an air quality maintenance area for ozone; however, there are no applicable source categories.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	This is a new source, therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	There is no applicable source category. *Note: 40 CFR 63, Subpart KK is not applicable because this facility does not use rotogravure and wide-web flexographic equipment.*
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	This facility is subject to Rule 62-213 F.A.C.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance will be demonstrated through recordkeeping.

III. Summary of Emissions

EU No. 001 - Printing and Manufacturing Operation (Bryan Dairy Road Location)
EU No. 002 - Printing and Manufacturing Operation (118th Avenue Location)
EU No. 003 - Printing and Manufacturing Operation (122nd Avenue Location)

Pollutant	EU No. and	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	001 & 002	95	N/A
	003	48.5	N/A
	Total	143.5	143.5
Total HAP	001, 002 & 003	23.5	23.5
Individual HAP	001, 002 & 003	9.4	9.4

{Permitting note: *The three printing operations have combined VOC potential emissions that exceed 100 tons. The new facility is approximately 4 miles from the existing facility on Bryan Dairy Road. These facilities are not physically connected (adjacent or contiguous) in any way; however, they are operationally connected based on feedback in an email received on May 11, 2012 from Mr. Marvin Scott. Based on the definition of "Major Source" in 40 CFR 70.2 and EPA guidelines, the new printing operation should be combined with the other two operations and permitted as one Title V facility.}*

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

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

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom

Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).