Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:
Mr. Arthur W. Schmidt, IV, Vice President

Air Permit No. 1030313-010-AC
Permit Expires: 7/31/2016
Minor Air Construction Permit
Project Name: Construction of Third Screen Printing Operation

This is the final air construction permit for a new silk screen printing operation. The proposed work will be conducted at Hit Promotional Products, Inc. (Standard Industrial Classification No. 3993). After the completion of this project, Hit Promotional Products, Inc. will have a total of three printing operation locations. The existing printing operation is located in Pinellas County at 7150 Bryan Dairy Road in Largo, Florida. The new silk screen printing operation (to be added as part of this construction permit) will be located in Pinellas County at 3320 122nd Avenue in St. Petersburg, Florida. Additionally, a new silk screen printing operation which is currently under construction (and authorized in Construction Permit 1030313-009-AC) is located in Pinellas County at 8226 118th Avenue North in Largo, Florida. The UTM coordinates for the three locations are as follows:

(1) 7150 Bryan Dairy Road - Zone 17, 328.9 km East, and 3083.9 km North,

(2) 8226 118th Avenue North - Zone 17, 327.4 km East, and 3085.0 km North, and

(3) 3320 122nd Avenue - Zone 17, 334.9 km East, and 3085.3 km North.

As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions

of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Robert C. Wong — Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Arthur W. Schmidt, IV, Hit Promotional Products, Inc. (jrschmidt@hitpromo.net)
Mr. Robert E. Wallace, III, P.E., Environmental Engineering Consultants, Inc. (rwallace@eec-tampabay.com)
Mr. Marvin Scott, Environmental Engineering Consultants, Inc. (mscott@eec-tampabay.com)
Mr. Gary Robbins, Pinellas County Air Quality Division (grobbins@pinellascounty.org)

Clerk Stamp

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

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of printing and manufacturing operation (E.U. No. 001) which is located at 7150 Bryan Dairy Road in Largo, Florida. This printing and manufacturing operation prints company names, logos, customized messages, etc. on pens, foam pads, cups, key chains and other miscellaneous products. Some of the products are manufactured at the facility. The printing is accomplished by various methods including: pad printing, screen printing, hot stamping, UV cured inks, and ceramic printing.

The existing facility consists of the following emissions unit.

Facility ID No. 1030313	
ID No.	Emission Unit Description
001	Printing and Manufacturing Operation (Bryan Dairy Road Location in Largo)

Project Description and Affected/Proposed Emission Units

This project is for the construction of a new silk screen printing operation (E.U. No. 003) which will be located at 3320 122nd Avenue North in St. Petersburg, Florida. This location is approximately 4 miles from the existing printing operation (E.U. No. 001). When complete, this new silk screen printing operation may include up to 28 various printers, 5 large dryers, 2 Debossing machines, 1 hot stamp machine and 2 pad printing machines. Equipment for this emissions unit will either be purchased or relocated from other locations.

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. This permit replaces Construction Permit No. 1030313-009-AC and therefore includes E.U. No. 002. This operation will be located at 8226 118th Avenue North in Largo, Florida. This location is approximately one mile from the existing printing operation (E.U. No. 001). When complete, this new silk screen printing operation may include up to 25 Lawson Trooper Silk Screen Printers, 75 Mini Silk Screen Printers and 25 Lawson Omega Electric Dryers. Equipment purchases for this emissions unit will occur in stages to meet customer demand and may take up to four years to complete.

Similar functions which will include screen printing on items such as books, blankets, umbrellas, tote bags, back packs and miscellaneous items will be performed at the 8226 118th Avenue North location in Largo (E.U. No. 002) and 3320 122nd Avenue North location in St. Petersburg (E.U. No. 003). Labeling on items such as coffee cups, water bottles, and other promotional items will be produced with UV ink which does not contain VOC.

This project will create the following emissions unit.

Facility ID No. 1030313	
ID No.	Emission Unit Description
002	Printing and Manufacturing Operation (118th Avenue Location in Largo)
003	Printing and Manufacturing Operation (122nd Avenue Location in St. Petersburg)

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

The following emissions units and/or activities are considered exempt from permitting pursuant to Rules 62-210.300(3)(a) or 62-210.300(3)(b), F.A.C.

- Manually operated tools (including but not limited to battery powered, electrically powered or pneumatically powered) used for buffing, polishing, carving, cutting, drilling, routing, sanding, sawing, trimming, machining, surface grinding, or turning.
- Polishing and venting operations vented indoors.
- Embroidery of hats and other materials.
- Ceramic printing of hot melt inks on mugs and other glassware.
- Two LEHR natural gas fired ovens for setting ceramic inks (maximum of 10,000,000 ft^3 natural gas/year combined).
- Hot stamping operations where no solvent based products are used.
- Miscellaneous propane use and forklift operations.
- Acetone usage.
- Soldering and equipment repair operations.
- UV ink printing.
- Electric forklift

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

Replaces Construction Permit No.1030313-009-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division (PCAQD). The PCAQD mailing address and phone number is:

   Pinellas County Air Quality Division
   300 South Garden Avenue
   Clearwater, Florida 33760
   Telephone: 727-464-4422

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements; and
   e. Appendix E. Equipment List.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is

defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Annual Emissions Fee Form and Fee: This facility will become subject to Title V Annual Emissions Fees, in accordance with Rule 62-213.205, F.A.C., on the day EU No. 003 commences operation. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

9. Application for Title V Air Operation Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of Emissions Unit No. 003. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Title V air operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. copies of the most recent month of records/logs specified in Specific Condition Nos. A.10. and A.11.; and

   The application(s) shall be submitted to the Permitting Authority with a copy to the Compliance Authority.

   [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. EU Nos. 001, 002 & 003 and Printing and Manufacturing Operations

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001, 002 & 003	Printing and Manufacturing Operations: – E.U. No. 001 consists of the printing and manufacturing operations located at 7150 Bryan Dairy Road in Largo, Florida. – E.U. No. 002 consists of the printing and manufacturing operations located at 8226 118th Avenue North in Largo, Florida. – E.U. No. 003 consists of the printing and manufacturing operations located at 3320 122nd Avenue North in St. Petersburg, Florida. These emissions units include activities such as printing, screening, gluing, manufacturing and cleaning. The inks and cleanup solvents used in the operation of the printing presses may contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs). VOC and HAPs are emitted fugitively from various points throughout the facility (doors, windows, ventilation system, etc.). *Note: A summary of the existing and proposed equipment for each site is included in Section 4. Appendix E – Equipment List.*

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.2. VOC Emissions Standard (Multi-Unit): The maximum VOC emissions from E.U. Nos. 001, 002 and 003 combined shall not exceed 143.5 tons per any consecutive 12 month period. [Permit Application dated 4/27/2012 and Rule 62-210.200(PTE), F.A.C.]

A.3. Individual and Total HAP Emissions Standards (Multi-Unit): The maximum HAP emissions from E.U. Nos. 001, 002 and 003 combined shall not exceed the following:

a. Total HAPs shall not exceed 23.5 tons per any consecutive 12 month period.

b. Any Individual HAP shall not exceed 9.4 tons per any consecutive 12 month period.

{Permitting note: Because of the limits specified above, this facility is not a major source of Total HAPs or Individual HAP.}

[Permit Application dated 4/27/2013 and Rule 62-210.200(PTE), F.A.C.]

A.4. Emissions Calculations**:** In order to document compliance with Specific Condition No. A.2. and A.3., the permittee shall calculate VOC and HAP emissions based on the following equation:

Emissions (in tons) = Usage x (VOC or HAP Content) /2000

Where:
Usage = gallons of material used.
VOC or HAP Content = pounds of VOC or HAP per gallon of material.

[Rule 62-4.070(3), F.A.C.]

A.5. General Standards: Objectionable Odor**:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. If the Department and/or Pinellas County Air Quality Division (PCAQD) receives a valid odor complaint, the Department and/or PCAQD reserves the right to require that odor control measures/work practices be implemented.
[Rules 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

A.6. General Standards: Volatile Organic Compound Emissions and/or Organic Solvent Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;

b. all VOC/OS from washings (equipment clean up) shall be directed into containers that prevent evaporation into the atmosphere;

c. tightly cover or close all VOC/OS containers when they are not in use;

d. prevent excessive air turbulence across exposed VOC/OS; and

e. immediately confine and clean up VOC/OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit 1030313-006-AC]

A.7. General Standards: Unconfined Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. Unconfined particulate emissions generated from activities such as trimming, sanding, sawing, machining, surface grinding, or other such activities shall be controlled by good work practices and normal good housekeeping procedures.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1030313-006-AC]

A.8. Unconfined Particulate Matter Opacity: As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. A.7. are adequate, visible emissions from the facility should not exceed 5%. If this value is exceeded, it shall not be a violation in and of itself, but an indication that additional control precautions and/or work practices beyond those of Specific Condition No. A.7. may be necessary. [Rule 62-4.070(3), F.A.C.; Construction Permit 1030313-006-AC]

NOTIFICATION REQUIREMENTS

A.9. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of initially commencing operation of the E.U. ID 003, no later than 15 days after that date. Commencing operation means setting into operation of the emissions unit for any purpose.

{Permitting Note: E.U. No. 002 commenced operation on 9/1/11}

[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.10. VOC Recordkeeping: In order to document compliance with the VOC emission limitations of Specific Condition No. A.2., the permittee shall maintain monthly VOC records for each emissions unit. The records shall contain, at a minimum, the following:

a. The facility name, facility ID No., and E.U. Nos. (i.e., Hit Promotional Products, Inc., 1030313, E.U. Nos. 001, 002 & 003).

b. For each emissions unit (E.U. Nos. 001, 002 and 003) include the following information:

1) total quantity (gallons) of each VOC-containing material (e.g., inks, coatings, thinners, solvents, etc.) used for the month;

2) VOC content (lbs/gallon) of each VOC-containing material (e.g., inks, coatings, thinners, solvents, etc.) used for the month for each emissions unit;

3) The total (calculated) VOC emissions (in tons) for the month.

c. For E.U. Nos. 001, 002 and 003 combined, include the total (calculated) VOC emissions (in tons) for the most recent 12 consecutive month period.

[Rule 62-4.070(3), F.A.C.]

A.11. HAP Recordkeeping**:** In order to document compliance with the HAP emission limitations of Specific Condition No. A.3., the permittee shall maintain monthly HAP records for each emissions unit, which shall contain, at a minimum, the following:

a. The facility name, facility ID No., and emission unit ID No. (i.e., Hit Promotional Products, Inc., 1030313, EU Nos. 001, 002 & 003).

b. For each emissions unit (E.U. Nos. 001, 002 and 003) include the following information:

1) total quantity (gallons) of each HAP containing material (i.e., inks, coatings, thinners, solvents, etc.) used for the month;

2) the Individual HAP and Total HAPs content (lbs/gallon) of each HAP-containing material (i.e., inks, coatings, thinners, solvents, etc.) used for the month;

3) the total (calculated) emissions (in tons) for each Individual HAP and for the Total HAPs for the month.

c. For E.U. Nos. 001, 002 and 003 combined, include the (calculated) emissions (in tons) for each Individual HAP for the most recent 12 consecutive month period.

d. For E.U. Nos. 001, 002 and 003 combined, include the (calculated) emissions (in tons) for the Total HAPs for the most recent 12 consecutive month period.

[Rule 62-4.070(3), F.A.C.]

A.13. Documentation: Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for monthly records, which includes sufficient information to determine VOC and HAP emissions, shall also be maintained. The use of purchases as a proxy for usage is not allowed for the monthly recordkeeping.
[Rule 62-4.070(3), F.A.C.]

A.14. Records Completion and Retention: All monthly records shall be completed by the 10th day of the following month. The records shall be maintained in a form suitable for inspection by the Department and/or PCAQD upon request and shall be retained at the facility for at least a five (5) year period.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]

A.15. Reporting Equipment Changes: The permittee shall submit an updated equipment list (Appendix E) for each emissions unit to the Department and to the PCAQD once a year by January 30th for the previous year if equipment was added to the facility. Any printing operation equipment changes that would result in an increase in actual emissions could be considered a modification and may require an air construction permit prior to installation.

{Permitting Note: Addition of equipment that would be subject to any unit specific applicable requirement (e.g. equipment meeting VOC RACT requirements in accordance with Rule 62-296.500, F.A.C.) would trigger the need for a construction permit prior to installation.}

[Rules 62-4.070(3), 62-210.200 ("Modification"), 62-210.300 (Permits Required), and 62-210.300(3)(b)1., F.A.C.; Construction Permit 1030313-006-AC]