PERMITTING MEMORANDUM
&
TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

TO: Mara Grace Nasca
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E.
Air Permitting Manager

FROM: Nancy E. Knight
Air Permitting Engineer

DATE: 01/12/2011

SUBJECT: Draft Permit Nos: 1030209-029-AC and 1030209-028-AO
Facility Name: Transitions Optical, Inc.

Day 90: 04/06/2011

On October 13, 2010, Transitions Optical, Inc. submitted an air operation permit application to renew Air Operation Permit 1030209-027-AF. After discussions with facility personnel and their consultant about modifications they wanted to make in the renewed permit, it was determined that a construction permit application must be submitted. A construction permit application was received on December 16, 2010.

Additional information about their recordkeeping was requested in a phone call to the facility on November 3, 2010, and a request for confirmation of the new emission unit descriptions was requested in an email on January 5, 2011. A number of emails were exchanged with the facility and their consultant (see file).

Changes to the current permit include:

Removes the descriptions of specific steps in the coating process from EU 001 since these steps are not accurate descriptions of actual operations.

Adds activities previously identified as exempt to EU 001 so all VOC and HAP emitting activities are tracked since their individual HAP emission limit is 9.95 TPY.

Removes the reference to a maximum physical production capacity of 30,000,000 lenses/year and a peak of 9,000 lenses/hour. These capacities were not permit limits and do not determine emissions.

Keeps facility-wide VOC/HAP emissions limitations but removes them from EU 001.

Adds monthly recordkeeping requirements to record usage and percent by weight of VOCs and HAPs (they are already doing this) and changes the weekly recordkeeping requirements to daily if 90% of the Title V threshold values for HAP emissions are exceeded.

Removes the list of the dated Operation and Maintenance (O & M) plans.

Changes the requirement to test the back-up dust collectors upon renewal for EUs 002 and 009 to require testing only if they have been operated since the previous renewal. If either one did not operate prior to renew but does operate after renewal, it must be tested within 30 days of operation.

I received comments from Gary Robbins on September 9, December 3, December 28, 2010, and January 10, 2011, with comments on their records and questions as to how to determine if a modification has been made to the facility without tracking each step of the coating processes.

There have been no enforcement cases against this facility in the past 5 years.

This memo serves as the technical evaluation and preliminary determination for Construction Permit 1030209-029-AC, as this project does not involve physical changes or changes in method of operation and there is no change in the facility's potential emissions as the result of this project.

I recommend that this draft permit packet be sent out as attached and submit it for your review and approval.