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 PERMITS

PERMITTEE

Transitions Optical, Inc.
9251 Belcher Road
Pinellas Park, FL 33782

Authorized Representative:
Mr. Vincent Sweeney, Plant Director

Air Permit Nos. 1030209-028-AO
1030209-029-AC
Permits Expire: 11/30/2011 (AC)
xx/xx/2016 (AO)
Site Name: Transitions Optical, Inc.
Minor Air Construction and Operation Permits
Project Name: Construction Permit Modification and Operation Permit Renewal

These are the final air construction and operation permits, in one document. The permits authorize the modification of previously permitted lens coating operations and renew the air operation permit. The work is to be conducted at Transitions Optical, Inc. (Standard Industrial Classification No. 3851). The facility is located in Pinellas County at 9251 Belcher Road in Pinellas Park, Florida. The UTM coordinates are Zone 17, 329.3 km East, and 3082.5 km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document 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

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

These air pollution permits are 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 these permits. 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 these final permits, 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

_____ _____

Mara Grace Nasca 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 Permits 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. Vincent Sweeney, Plant Director, Transitions Optical, Inc.
vsweeney@transitions.com

Ms. Christine Appel, EHS Manager, Transitions Optical, Inc.
cappel@transitions.com

Mr. Robert A. Baker, P.E., Baker Environmental Engineering, Inc.
baker@atlantic.net

Mr. Gary Robbins, Environmental Program Coordinator, Pinellas County Air Quality Division
grobbins@co.pinellas.fl.us

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

This is an ophthalmic-lens coating and processing facility. The existing facility consists of the following emissions units.

Facility ID No. 1030209	
ID No.	Emission Unit Description
001	Nine (9) Business Units & small (table top) surface coating chamber
002	Lens Shaping Area No. 1
009	Lens Shaping Area No. 3

Project Description and Affected Unit

This project modifies the following emissions unit. The description now includes activities previously identified as exempt and removes the descriptions of specific steps in the coating process. It also 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. It adds monthly recordkeeping requirements to record usage and percent by weight of VOCs and HAPs and changes the weekly recordkeeping requirements to daily if 90% of the Title V threshold values for HAP emissions are exceeded. It removes the list of the dated Operation and Maintenance (O & M) plans. It removes welding from the list of exempt activities

Facility ID No. 1030209	
ID No.	Emission Unit Description
001	Ophthalmic Lens Coating and Processing
002	Lens Shaping Area No. 1 with baghouse
009	Lens Shaping Area No. 3 with baghouse

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

Exempt Emission Units/Activities

Two boilers (5.0 MMBTU/hr. & 1.5 MMBTU/hr.) and one process heater (2.5 MMBTU/hr.). Maximum VOC and HAP emissions while operating 8760 hours/year are 0.22 TPY and 0.18 TPY respectively.
Rule 62-210.300(3)(a)33., F.A.C.

One emergency (diesel-powered) generator, rated at 3.8 MMBTU/hr. Maximum VOC and HAP emissions burning 32,000 gallons of diesel fuel annually are 0.75 TPY and 0.01 TPY respectively.
Rule 62-210.300(3)(a)32., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOCs), individual hazardous air pollutants (HAPs), and total hazardous air pollutants (THAPs).

PERMIT HISTORY/AFFECTED PERMITS

Modify and replace permits 1030209-026-AC and 1030209-027-AF.

ADMINISTRATIVE REQUIREMENTS

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. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
300 South Garden Avenue
Clearwater, Florida 33756
Telephone 727-464-4422

3. Appendices - The following Appendices are attached as part of this document:

a. Appendix A. Citation Formats and Glossary of Common Terms;
b. Appendix B. General Conditions;
c. Appendix C. Common Conditions; and
d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this document, 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 these permits 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. 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. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit. To properly apply for an 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. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. copies of the most recent compliance test reports required by Specific Condition No. B.10., if not previously submitted;

d. copies of the most recent two months of records/logs specified in Specific Condition Nos. 11, A.2., A.3. (if required) and B.11.; and

e. any revisions to the O & M Plan.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

10. Facility-wide VOC & HAP Emission Limitations – Emissions from this facility shall not exceed the following in any consecutive 12-month period:

Pollutant	tons/any consecutive 12-month period
VOCs	77.1
Any Individual HAP	9.95
Total HAPs	21.69

(Permitting Note: These emission limits include exempt source emissions)

[Rules 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1030209-021-AC]

11. Recordkeeping Requirements – The emission values given for each of the Exempt Emission Units/Activities on page 3 of this permit shall be added to the records specified in Specific Condition A.2.
[Rule 62-4.070(3), F.A.C.]

12. Records Completion and Retention - The monthly records required by Specific Condition Nos. 11 and A.2. shall be completed by the end of the following month. Daily records, if required by Specific Condition No. A.3. shall be completed within five (5) business days. The records shall be maintained in a form suitable for inspection by the Department and/or Pinellas County Air Quality Division upon request and shall be retained for at least a three (3) year period.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]

13. Objectionable Odor Limitation - The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. An "Objectionable Odor" is defined as 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.
[Rule 62-296.320(2), F.A.C. and Pinellas County Code, Section 58-178]

14. Volatile Organic Compounds Emissions or Organic Solvents Emissions – No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. All equipment, pipes, hoses, lids, fittings, etc. shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials containing VOCs/OSs/HAPs.
[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1030209-026-AC]

A. EU No. 001 Ophthalmic Lens Coating and Processing

This section of the document addresses the following emissions unit.

ID No.	Emission Unit Description
001	This emission unit includes all sources of VOC and HAP emissions resulting from ophthalmic lens coating processes. The sources include: - Nine business units where pre-manufactured lenses that have been etched and edged (see EU Nos. 002 and 009) undergo multiple cleaning, coating and curing stages resulting in proprietary treated photochromic lenses; - One table top surface coating chamber; - Lens and box ink stampers that imprint identification codes on some individual lenses and lens boxes; - Testing of various coating formulations; - Solvent usage; - Parts cleaning; and - A photochromic-solution mixing area where small (approximately 100 liters or less) batch-mixing of proprietary, photochromic formulations occur once per shift. Fine powders and solids may be components of formulations and mixing these materials may result in particulate emissions during the mixing process. VOC, HAP and PM emissions resulting from these activities are exhausted to the atmosphere uncontrolled.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity - The maximum number of business units is nine (9) and there can be only one (1) table top surface coating chamber.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1030209-026-AC]

RECORDS AND REPORTS

A.2. Monthly Recordkeeping Requirements - In order to demonstrate compliance with Specific Condition No. 10., the permittee shall keep the following records monthly based on a facility-wide mass balance. At the permittee's option, "purchases" may be used where "usage" is specified. If this option is utilized, no materials may be used which are not purchased.

a. Facility Name and Emission Unit ID No. (1030209, EU 001);

b. total quantity (lbs.) of each VOC containing material (e.g., coatings, inks, solvents, etc.) used for the month;

c. VOC content (percent by weight) of each VOC containing material (e.g., coatings, inks, solvents, etc.) used for the month;

A.2. *(continued)*

d. calculated monthly total (tons/month) VOC emissions (based upon b. and c. above);

e. cumulative total of VOC emissions for the most recent 12 consecutive month period (tons per 12 consecutive month period).

f. total quantity (lbs.) of each HAP containing material (e.g., coatings, inks, solvents, etc.) used for the month;

g. HAP content (percent by weight) of each HAP containing material (e.g., coatings, inks, solvents, etc.) used for the month;

h. calculated monthly total (tons/month) HAP emissions for each individual HAP and for total HAPs (based upon f. and g. above); and

i. cumulative total of the HAP emissions for each individual HAP and total HAPs for the most recent 12 consecutive month period (tons per 12 consecutive month period).

Supporting documentation ("As supplied", "As Applied" sheets, MSD sheets, purchase orders, etc.) shall be kept which includes sufficient information to determine VOC and HAP emissions.

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

A.3. Daily Recordkeeping Requirements - If any month results in facility-wide total HAP or individual HAP emissions exceeding 90% of the Title V threshold limits (i.e., 9.0 tons of individual HAPs or 22.5 tons of total HAPs) for the most recent consecutive 12-month period, the facility shall keep daily records beginning on the next operational day following when the monthly calculation was completed. The daily records shall include cumulative 12-month emission totals to demonstrate compliance with the emission limitations of Specific Condition No. 10. When one month of daily records is completed, the facility shall make a determination if daily recordkeeping must be continued. If HAP emissions continue to exceed 90% of the Title V threshold limits, then daily recordkeeping shall continue. If these emissions do not exceed 90% of the Title V threshold limits, then the facility may return to monthly recordkeeping. The use of purchases as a proxy for usage is not allowed for daily recordkeeping.
[Rule 62-4.070(3), F.A.C.]

B. EU Nos. 002 and 009 Lens Shaping Area No. 1 and Lens Shaping Area No. 3

This section of the document addresses the following emissions units.

ID Nos.	Emission Unit Description
002	Lens shaping area No. 1 - Equipment in this area is used to shape lenses prior to going through the coating processes of EU 001. Up to twenty (20) pieces of lens shaping equipment may be utilized at one time. Plastic particulate matter from the equipment is collected by hoods at each piece of equipment and is controlled by a common Airotech reverse pulse fabric filter dust collector, Model 5P-130-8-(10) BA. A Dust-Hog Supra-Blast Dust Collector, Model SBD8-2, is used as a backup control device. The back up dust collector does not operate simultaneously with the primary dust collector.
009	Lens shaping area No. 3 - Equipment in this area is used to shape lenses prior to going through the coating processes of EU 001. Up six (6) pieces of lens shaping equipment may be utilized at one time. Plastic particulate matter from the equipment is collected by hoods at each piece of equipment and is controlled by a common Ultra-Conic cartridge filter dust collector, Model UC-412. A Dust-Hog Supra-Blast Dust Collector, Model SBD8-2, is used as a backup control device. The back up dust collector does not operate simultaneously with the primary dust collector.

Permitting Note: The 7th and 8th pieces of lens shaping equipment, which are part of Emission Unit No. 009, have not been installed and are not part of this permit. These 2 pieces of equipment are authorized in construction permit 1030209-021-AC (see amended permit 1030209-026-AC).

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity - The maximum number of pieces of lens shaping equipment that can operate in each lens shaping area is as follows:

a. EU 002 - Lens Shaping Area No. 1 – twenty (20) pieces of equipment.

b. EU 009 - Lens Shaping Area No. 2 – six (6) pieces of equipment.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1030209-026-AC]

B.2. Dust Collector Operation – The primary dust collector in each lens shaping area may not operate simultaneously with the backup dust collector in that area.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030209-026-AC]

EMISSIONS STANDARDS

B.3. Circumvention Limitation - No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device (baghouses) operating properly. As an indicator that the particulate control devices are operating properly, the

Department has determined there should be no visible emissions (≤5% opacity) from each device. Visible emissions in excess of 5% are not considered a violation in and of itself, but an indicator of improper operation and may indicate a violation of Rule 62-210.650, F.A.C.
[Rules 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit 1030209-026-AC]

TESTING REQUIREMENTS

B.4. Compliance Tests - Each of the 4 dust collectors associated with Emission Unit Nos. 002 and 009 shall be tested for visible emissions at least 105 days prior to and no more than 365 days prior to the expiration date of this permit. Since the Dust-Hog Supra-Blast Dust Collector associated with Emission Unit No. 009 was not operational prior to the effective date of this permit, this dust collector shall be tested within 30 days after being placed back in operation. If the back-up dust collector associated with either EU No. 002 or EU No. 009 has not operated in the five years prior to permit renewal, no testing is required. If either back-up dust collector is subsequently operated after that permit renewal, that dust collector shall be tested within 30 days of operation. The test report(s) shall be submitted within 45 days of testing to the Air Compliance Sections of this office and the Pinellas County Air Quality Division.
[Rule 62-297.310, F.A.C.]

B.5. Test Requirements - Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this document.
[Rule 62-297.310, F.A.C.]

B.6. Test Method - Required tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

B.7. Operating Requirements During Testing - Each compliance test shall be conducted with all the pieces of equipment located in each area operating simultaneously, if practical. If it is impractical to test with all pieces of equipment operating simultaneously the emissions unit may be tested with fewer pieces of equipment operating. In this case, subsequent operation is limited to the number of pieces of equipment (or fewer) operating during the test until a new test is conducted. Once the unit is so limited, operation with a greater number of pieces of equipment is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate with the higher number. In no case shall the maximum number of pieces of equipment that are: (1) located in each lens shaping area or (2) operating simultaneously exceed their associated maximum number as shown in Specific Condition No. B.1., above. Failure to submit: (1) a statement

B.7. *(continued)*

identifying which baghouse was tested; (2) the number of pieces of equipment that were operating simultaneously during the test; and (3) the number of pieces of equipment located in each lens shaping area tested may invalidate the test and fail to provide reasonable assurance of compliance.
[Rules 62-297.310(2) and 62-4.070(3), F.A.C.]

NOTIFICATION REQUIREMENTS

B.8. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each

test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

> (*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

B.9. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing within 15 days of the date of commencing operation of the Dust-Hog Supra-Blast Dust Collector associated with Emission Unit No. 009.
[Rule 62-4.070, F.A.C.]

RECORDS AND REPORTS

B.10. Test Reports - The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this document.
[Rule 62-297.310(8), F.A.C.]

B.11. Recordkeeping Requirements -The permittee shall comply with the following:

a. If the most recent visible emission test for Emission Unit No. 002 or Emission Unit No. 009 is not conducted with its associated maximum allowable pieces of equipment operating, then the permittee shall daily record the maximum number of pieces of equipment operating simultaneously for that emission unit.

b. In order to ensure the 2 baghouses associated with each emission unit are not operating simultaneously, the permittee shall daily record for each emission unit, which baghouse was operating.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030209-026-AC]

B.12. Operation and Maintenance (O & M) Plan for Particulate Matter Control - For air pollution control devices and collection systems, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of each control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

a. Performance Parameters:

1. The operating parameters of each baghouse.
2. The timetable for the routine maintenance of each baghouse as specified by the manufacturer.
3. The timetable for routine periodic observations of each baghouse sufficient to ensure proper operation.
4. A list of the type and quantity of required spare parts for each baghouse, which are stored on the premises.

b. Operation and Maintenance Log:

1. When maintenance and observations were performed.
2. What maintenance and observations were performed.
3. Who performed said maintenance and observations.
4. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C. and Pinellas County Code, Sect. 58-128]