Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Mimi A. Drew
Secretary

FINAL 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. 1030313-009-AC
Permit Expires: 12/31/2014
Minor Air Construction Permit
Project Name: Construction Permit to Add a New Silk Screen Printing Operation

This is the final air construction permit, which authorizes the construction of a new silk screen printing operation. The proposed work will be conducted at Hit Promotional Products, Inc. (Standard Industrial Classification No. 3993). Hit Promotional Products, Inc. is located in Pinellas County at 7150 Bryan Dairy Road in Largo, Florida. The new silk screen printing operation will be located in Pinellas County at 8226 118th Avenue North in Largo, Florida. The UTM coordinates are Zone 17, 327.4 km East, and 3085.0 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

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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

_____ _____

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 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, Vice President, Hit Promotional Products, Inc. (jrshmidt@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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of printing and manufacturing operation (E.U. ID No. 001) which is located at 7150 Bryan Dairy Road in Largo, Florida. This printing and manufacturing operation is used print 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: 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)

Project Description and Proposed Emission Units

This project is for the construction of a new silk screen printing operation (E.U. ID. 002) which will be located at 8226 118th Avenue North in Largo, Florida. This new location is approximately one mile from the existing printing operation (E.U. ID. 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. This emissions unit will use silk screen printers to print on tote bags, back packs, umbrellas and other items.

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)

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 insignificant in accordance with the provisions of Rules 62-4.040(1)(b), 62-210.300(3)(a) or 62-210.300(3)(b), F.A.C. The expected emissions will not cause this facility to exceed Title V permitting thresholds; however changes in expected operations or additions to this list should be evaluated for their effect on Title V permitting.

- Manually operated tools 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.

- LEHR natural gas fired oven for setting ceramic inks (maximum of 4,000,000 ft^3 natural gas/year).
- Hot stamping operations where no solvent based products are used.
- Electrically heated polypropylene molding machine for manufacturing of key chains.
- Miscellaneous propane use and forklift operations (maximum of 1,200 gallons propane/year).
- Acetone usage.
- Soldering and equipment repair operations.
- UV ink printing.

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 VOC and HAP pollutants.

PERMIT HISTORY/AFFECTED PERMITS

Modifies and replaces Construction Permit No.1030313-006-AC; modifies Operation Permit 1030313-008-AF

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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. Application for Non-Title V Air Operation Permit: This permit authorizes the construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. Air Operation Permit Applications shall be submitted as described below:

   a. Application for the Initial Revision of the Existing Air Operation Permit: The permittee shall submit an application for the revision of the existing 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. 002. Commencing operation means setting into operation of any emissions unit for any purpose.

   b. Application(s) for Subsequent Revisions of the Existing Air Operation Permit: Since this permit allows construction to occur over several years, the permittee shall submit applications to revise the air operation permit to the Department at least 90 days prior to expiration of this permit , but no later than March 1 of each year (if necessary). Each subsequent application shall cover construction activities from the previous calendar year and is considered necessary if the two following conditions are met:

      1) the application for the initial revision of the air operation permit was not submitted to the Department in the previous calendar year, and

      2) the facility commenced operation of additional printers in Emissions Unit No. 002 during the previous calendar year and the additional printers have not been included in the facility's operation permit.

   c. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

      1) 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/)*;

      2) the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

      3) copies of the most recent two months of records specified in Specific Condition Nos. A.10. and A.11.

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

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

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

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	Printing and Manufacturing Operations: This emissions unit consists of the printing and manufacturing operations located at 7150 Bryan Dairy Road in Largo, Florida. The operations include printing, screening, gluing, manufacturing and cleaning. The inks and cleanup solvents used in the operation of the printing presses may contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). VOCs and HAPs are emitted fugitively from various points throughout the facility (doors, windows, ventilation system, etc.).
002	Printing and Manufacturing Operations: This emissions unit consists of the printing operations located at 8226 118th Avenue North in Largo, Florida. The operations may consist of up to 25 Lawson Trooper Silk Screen Printers, 75 Mini Silk Screen Printers and 25 Lawson Omega Electric Dryers. The inks and cleanup solvents used in the printing operation may contain volatile organic compounds (VOC) and hazardous air pollutants (HAP). The VOC and HAP generated from the printing operation are emitted fugitively.

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. ID Nos. 001 and 002 combined shall not exceed 95.0 tons per any consecutive 12 month period. [Permit Application dated 9/27/2010 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. ID Nos. 001 and 002 combined shall not exceed the following:

a. Total HAP shall not exceed 20.0 tons per any consecutive 12 month period.
b. Any Individual HAP shall not exceed 9.4 tons per any consecutive 12 month period.

[Permit Application dated 9/27/2010 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:

a. Flexographic Printing Operations:

Emissions (in tons) = Flexographic ink usage x (VOC or HAP Content) x 0.98*/2000

Where:
Flexographic ink usage = gallons of material used.

VOC or HAP Content = pounds of VOC or HAP per gallon of material.
* =Based on a 2% credit for VOC retention in the product.

b. All other printing operations:

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 EU No. 002, no later than 15 days after that date. Commencing operation means setting into operation of the emissions unit for any purpose.
[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. The records must clearly indicate which materials are used solely in flexographic printing and therefore qualify for the 2 percent VOC retention credit (*see Specific Condition No. A.4.a.*). The records shall contain, at a minimum, the following:

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

b. For each emissions unit (E.U. No. 001 and 002) 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 and 002 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 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 No. 001 & 002).

b. For each emissions unit (E.U. No. 001 and 002) 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 and 002 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 and 002 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.12. Daily Recordkeeping: If any month results in VOC or individual HAP emissions exceeding 90% of the major source threshold (i.e., 90.0 tons of VOC or 9.0 tons of any individual HAP) for the most recent 12 consecutive month period, the facility shall keep daily records beginning on the next operational day following the date the monthly calculation was completed. These records shall be added daily to the most recent eleven (11) calendar month's emissions totals. When one month of daily records is completed, the facility shall make a determination if daily recordkeeping must be continued. If VOC or individual HAP emissions continue to exceed 90% of the major source threshold, then daily record keeping shall continue. If VOC and individual HAP emissions do not exceed 90% of the major source threshold, then the facility may return to monthly recordkeeping. The daily records shall include cumulative 12-month emission totals to demonstrate compliance with the emission limitations of Specific Condition Nos. A.2. and A.3.
[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 the daily and 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 and daily 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. Daily records, if required, shall be completed within three (3) business days. 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 three (3) year period.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]

A.15. Reporting Equipment Changes: The facility shall submit an updated equipment list (Appendix E) to the Department and to the PCAQD once a year by January 30th. 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]