Hit Promotional Products, Inc.

Facility ID No. 1030313
Pinellas County

Initial Title V Air Operation Permit

Permit No. 1030313-011-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
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Compliance Authority:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, FL 33760

Telephone: 727-464-4422
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DRAFT/PROPOSED PERMIT

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

Permit No. 1030313-011-AV
Facility ID No. 1030313
Initial Title V Air Operation Permit

This is the initial Title V air operation permit for the above referenced facility. This permit replaces Air Operation Permit 1030313-008-AF and incorporates the provisions of Construction Permit No. 1030313-010-AC. The facility includes three printing operations located in Pinellas County at 7150 Bryan Dairy Road in Largo, Florida; 3320 122nd Avenue in St. Petersburg, Florida; and 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.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft/Proposed)

_____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

KMB/ds/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility consists of three printing and manufacturing operations (emissions units) each located at three different manufacturing sites in Pinellas County, Florida. Emissions Unit (E.U.) No. 001 is the primary printing operation which is located at 7150 Bryan Dairy Road in Largo. E.U. No. 002 is located at 8226 118th Avenue North in Largo and is approximately one mile from E.U. 001. E.U. No. 003 is located at 3320 122nd Avenue North in St. Petersburg and is approximately four miles from E.U. No. 001. The facility also includes one unregulated backup emergency generator (E.U. No. 004) which is used at the 7150 Bryan Dairy Road location.

The printing and manufacturing operation prints company names, logos, customized messages, etc. on pens, foam pads, cups, water bottles, 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.

Inks and cleanup solvents used in the operation of the printing presses may contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs) which are emitted fugitively. 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 facility is classified as a Title V major source of the air pollutant VOC and is a synthetic minor source of HAPs.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Printing and Manufacturing Operation (Bryan Dairy Road Location in Largo)
002	Printing and Manufacturing Operation (118th Avenue Location in Largo)
003	Printing and Manufacturing Operation (122nd Avenue Location in St. Petersburg)

Subsection C. Applicable Regulations.

Based on the initial Title V air operation permit application received March 20, 2013, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Objectionable Odor Prohibited. 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; Construction Permit No. 1030313-010-AC]

FW3. 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.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1030313-010-AC]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. 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.
[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1030313-010-AC]

FW6. Unconfined Particulate Matter Opacity. As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. FW5. 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. FW5. may be necessary.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030313-010-AC]

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW7. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. 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.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

The specific conditions in this section apply to the following emissions units:

EU No.	Brief 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.). The printing operation on Bryan Dairy Road also includes a backup emergency spark ignition engine. It is a Cummins 60kW generator and is included in Appendix U as an unregulated emissions unit. *Note: An equipment list that represents the facility at the time the initial Title V application was received is included in Appendix E – Equipment List. This list has been included for information purposes only.*

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. These emissions units may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1030313-010-AC]

Emission Limitations and Standards

Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

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.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1030313-010-AC]

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.}

[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1030313-010-AC]

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.; Construction Permit No. 1030313-010-AC]

Recordkeeping and Reporting Requirements

A.5. Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.6. 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 information.

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.; Construction Permit No. 1030313-010-AC]

A.7. 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 information.

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.; Construction Permit No. 1030313-010-AC]

A.8. 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.; Construction Permit No. 1030313-010-AC]

A.9. 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; Construction Permit No. 1030313-010-AC]

A.10. 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 1030313-010-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix E, Equipment List

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix RR, Facility-wide Reporting Requirements

Appendix TV, Title V General Conditions

Appendix U, List of Unregulated Emissions Units and/or Activities

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis

Table H, Permit History

Table 1, Summary of Air Pollutant Standards and Terms