

Department of
Environmental Protection
Division of Air Resource Management

**SUBMITTED APPLICATION REPORT
APPLICATION FOR AIR PERMIT - NON-TITLE V SOURCE**

Application Number: 4758- 1
Application Name: HILEX AO REVISION
Date Submitted: 12 January 2017

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: HILEX POLY CO., LLC	
2. Site Name: HILEX POLY CO., LLC	
3. Facility Identification Number: 0310298 <input type="checkbox"/> Unknown	
4. Facility Location:	
Street Address or Other Locator:	ELLIS ROAD AT BROADWAY NORTH OF BEAVER (US90) 500-A NORTH ELLIS RD.
City: JACKSONVILLE	County: DUVAL Zip Code: 32254-2887
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



Application Contact

1.	Application Contact Name: SHREYAS ERAPALLI	Application Contact Job Title: Senior Consultant
2.	Application Contact Mailing Address: Organization/Firm: TRINITY CONSULTANTS Street Address: 919 LAKE BALDWIN LANE SUITE B City: ORLANDO State: FL Zip Code: 32814	
3.	Application Contact Telephone Numbers: Telephone: (407) 982-2891 ext. 503 Fax:	
Application Contact Email Address: serapalli@trinityconsultants.com		

Purpose of Application**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial non-Title V air operation permit for one or more existing, but previously unpermitted, emissions units.
- Initial non-Title V air operation permit for one or more newly constructed or modified emissions units.
Current construction permit number: 0310298007
- Non-Title V air operation permit revision to address one or more newly constructed or modified emissions units.
Current construction permit number: 0310298007
Operation permit number to be revised: 0310298006
- Initial non-Title V air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.
Current operation/construction permit number(s):
- Non-Title V air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.
Operation permit number to be revised: 0310298006
Reason for revision:

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative Statement

1. Owner/Authorized Representative Name: JIM KLUCCHARICH	Owner/Authorized Representative Job Title: Plant Manager
2. Owner/Authorized Representative Mailing Address: Organization/Firm: NOVOLEX Street Address: 500 A NORTH ELLIS ROAD City: JACKSONVILLE State: FL Zip Code: 32254	
3. Owner/Authorized Representative Telephone Numbers: Telephone: (904) 783-9985 ext. 21 Fax:	
Owner/Authorized Representative Email Address: jim.klucharich@novolex.com	
4. Owner/Authorized Representative Statement: By entering my PIN below, I certify that I am the owner or authorized representative of the facility addressed in this application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of the facility or any permitted emissions unit.	

Professional Engineer Certification

1.	Professional Engineer Name: BRAD JAMES Registration Number: 69756	Professional Engineer Job Title: Manager of Consulting Services
2.	Professional Engineer Mailing Address: Organization/Firm: TRINITY CONSULTANTS Street Address: 3495 PIEDMONT ROAD, BLD. 10 SUITE 905 City: ATLANTA State: GA Zip Code: 30305	
3.	Professional Engineer Telephone Numbers: Telephone: (678) 441-9977 ext. 224 Fax:	
	Professional Engineer Email Address: BJAMES@TRINITYCONSULTANTS.COM	
4.	Professional Engineer Statement: I hereby certify, except as particularly noted herein*, that: (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and (2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application. If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application. If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit. * Explain any exception to the certification statement.	

Professional Engineer Exception Statement:

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Permit Type
1	FLEXOGRAPHIC PRINTING FACILITY with 16 printing lines	AOMM

Note: The fee calculation information associated with this application may be accessed from the Main Menu of ESPAP.

Construction/Modification Information

1. Description of Proposed Project or Alterations:
2. Projected or Actual Date of Commencement of Construction:
3. Projected Date of Completion of Construction:

Application Comment

Addition of 4 additional presses and 14 ink fountains

Facility Contact Email Address: greg.sullens@novolex.com

Facility Regulatory Classifications

Check all that apply:

1.	<input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source?	
3.	<input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4.	<input type="checkbox"/> Synthetic Minor Source of HAPs?	
5.	<input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
6.	<input type="checkbox"/> One or More Emissions Units Subject to NESHAP Recordkeeping or Reporting?	
12.	Facility Regulatory Classifications Comment:	

Rule Applicability Analysis

See Attached Application Narrative

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Class.	3. Requested Emissions Cap lb/hour tons/year		4. Basis for Emissions Cap	5. Pollutant Comment
HAPS	B				
VOC	B				

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location	<input type="checkbox"/> Applicable	<input type="checkbox"/> Waiver Requested	<input type="checkbox"/> Attachment
2. Facility Plot Plan	<input type="checkbox"/> Applicable	<input type="checkbox"/> Waiver Requested	<input type="checkbox"/> Attachment
3. Process Flow Diagram(s)	<input type="checkbox"/> Applicable	<input type="checkbox"/> Waiver Requested	<input type="checkbox"/> Attachment
4. Precautions to Prevent Emissions of Unconfined Particulate Matter	<input type="checkbox"/> Applicable	<input type="checkbox"/> Waiver Requested	<input type="checkbox"/> Attachment
5. Supplemental Information for Construction Permit Application	<input checked="" type="checkbox"/> Applicable		<input checked="" type="checkbox"/> Attachment
6. Supplemental Information Comment:			

Facility Attachments

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document	Date Uploaded
Supplemental Information for Construction Permit Application	Hilex - AO Permit Application (2016-1010) SE final.pdf	AO Revision application	Yes	12/13/2016

III. EMISSIONS UNIT INFORMATION
A. GENERAL EMISSIONS UNIT INFORMATION

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in this Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>		
<p>2. Description of Emissions Unit Addressed in this Section: FLEXOGRAPHIC PRINTING FACILITY with 16 printing lines</p>		
<p>3. Emissions Unit Identification Number: <input type="checkbox"/> No ID ID: 1</p>		
<p>4. Emissions Unit Status Code: A - Active</p>	<p>5. Initial Startup Date:</p>	<p>6. Emissions Unit Major Group SIC Code: 27</p>
<p>7. Emissions Unit Comment:</p>		

Emissions Unit Control Equipment

<u>Code</u>	<u>Equipment</u>	<u>Description</u>
0	NO CONTROL EQUIPMENT	

Emissions Unit Details

1. Package Unit:		
Manufacturer:		Model Number:
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
	Dwell Temperature:	° F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	° F

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: million Btu/hr		
2. Maximum Incineration Rate:	pounds/hr	
	tons/day	
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment:		
	7.15 lb/hr Maximum Ink Usage Per Fountain for 32 Fountains	

B. EMISSION POINT (STACK/VENT) INFORMATION

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: FUGITIVE EMISSIONS FROM PRINTING OPERATIONS		2. Emission Point Type Code: 3 - A configuration of multiple emission points serving a single emissions unit	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: (F) FUGITIVE EMISSIONS, NO STACK EXISTS	6. Stack Height: 36 feet	7. Exit Diameter: 1 feet	
8. Exit Temperature: 130° F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 428.39 North (km): 3355.9			
14. Emission Point Comment: 32 EMISSION POINTS/INK FOUNTAINS			

C. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Inks and Coatings		
2. Source Classification Code (SCC): 40500312	3. SCC Units: Gallons Ink Used	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		
Is this a valid segment? Yes		

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: HAPS - Total Hazardous Air Pollutants		2. Pollutant Regulatory Code:	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:	
6. Potential Emissions: .99 lb/hour 4.32 tons/year		7. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8. Emission Factor: .3 OTHER (SPECIFY IN COMMENT) Reference:		9. Emissions Method Code: (2) CALCULATED BY USE OF MATERIAL BALANCE AND KNOWLEDGE OF THE PROCESS.	
10. Calculation of Emissions: See Appendix A of application			
11. Pollutant Potential Emissions Comment: % as worst case content from all inks and coatings			

Allowable Emissions

No Pollutant Allowable Emissions information submitted.

Potential Emissions

1. Pollutant Emitted: VOC - Volatile Organic Compounds		2. Pollutant Regulatory Code:	
3. Primary Control Device Code: 0 - NO CONTROL EQUIPMENT	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:	
6. Potential Emissions: 1.32 lb/hour 5.76 tons/year		7. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8. Emission Factor: Reference: 4 OTHER (SPECIFY IN COMMENT)		9. Emissions Method Code: (2) CALCULATED BY USE OF MATERIAL BALANCE AND KNOWLEDGE OF THE PROCESS.	
10. Calculation of Emissions: See Appendix A of application			
11. Pollutant Potential Emissions Comment: % as worst case content from all inks and coatings			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: (RULE) Emissions limitation required by rule (Specify rule in comment field)	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 5.76 TONS/YEAR	4. Equivalent Allowable Emissions: lb/hour 5.76 tons/year
5. Method of Compliance: RECORDKEEPING	
6. Allowable Emissions Comment (Description of Operating Method): UPON REQUEST TN/YR	

E. VISIBLE EMISSIONS INFORMATION
(Only Emissions Units Subject to a VE Limitation)

No Visible Emissions information submitted.

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No Visible Emissions information submitted.

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(Only Emissions Units Subject to a VE Limitation)

No Visible Emissions information submitted.

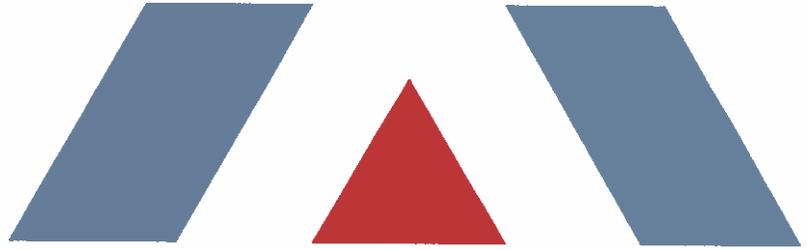
**F. CONTINUOUS MONITOR INFORMATION
(Only Emissions Units Subject to Continuous Monitoring)**

No Continuous Monitoring information submitted.

G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Applicable <input type="checkbox"/> Waiver Requested <input type="checkbox"/> Attachment
2. Fuel Analysis or Specification <input type="checkbox"/> Applicable <input type="checkbox"/> Waiver Requested <input type="checkbox"/> Attachment
3. Detailed Description of Control Equipment <input type="checkbox"/> Applicable <input type="checkbox"/> Waiver Requested <input type="checkbox"/> Attachment
4. Description of Stack Sampling Facilities <input type="checkbox"/> Applicable <input type="checkbox"/> Waiver Requested <input type="checkbox"/> Attachment
5. Compliance Test Report <input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date: <input type="checkbox"/> Attachment
6. Procedures for Startup and Shutdown <input type="checkbox"/> Applicable <input type="checkbox"/> Waiver Requested <input type="checkbox"/> Attachment
7. Operation and Maintenance Plan <input type="checkbox"/> Applicable <input type="checkbox"/> Waiver Requested <input type="checkbox"/> Attachment
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
9. Other Information Required by Rule or Statute <input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
10. Supplemental Requirements Comment:



AIR OPERATION PERMIT REVISION APPLICATION

Hilex Poly Co., LLC
Jacksonville, FL



Prepared By:

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October 2016

Project 161001.0074

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Consultants

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1. EXECUTIVE SUMMARY

1.1. FACILITY OVERVIEW

Hilex Poly Co., LLC (Hilex) operates a flexographic printing facility in Jacksonville, Duval County, Florida (Jacksonville facility). The existing operations include with 12 printing lines and 32 ink fountains. Each printing line is composed of a printing press and a bag machine. Each printing press has ink fountains varying in quantity from one (1) to four (4). The facility is located at 500 A North Ellis Road, Jacksonville, FL – 32254. The facility has the following UTM Coordinates: Zone 17, 428.5 km E and 3356 km N.

The Jacksonville facility is a minor source of air pollution because the potential-to-emit (PTE) of regulated air pollutants is less than 100 tons per year (tpy), and the PTE of hazardous air pollutants (HAPs) is less than 10 tpy for a single HAP, and less than 25 tpy for total HAPs pursuant to Rule 62-4, 62-210 (142), F.A.C., as administered by the Florida Department of Environmental Protection (DEP) Northeast District Office, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Hilex operates under Air Operation Permit No. 0310298-006-AO issued by the DEP Northeast District Office on June 18, 2015. Based on a recent construction permitting actions, the facility also constructed four (4) additional flexographic printing presses, and an additional 14 ink fountains and bag machines associated with the new printing presses. The construction of the proposed equipment did not result in a change of the facility's minor source classification with respect to the Title V permitting program. However, there was an increase in the PTE for the facility. The identified permitting actions were part of the changes incorporated in Permit No. 0310298-007-AC issued on May 17, 2016.

1.2. SCOPE OF OPERATION PERMIT REVISION APPLICATION

Section 2., Specific Condition 9 of Permit No. 0310298-007-AC requires Hilex to submit a Non-Title V operation permit application within 180 days from commencement of operation of the new printing presses and associated equipment. The new printing presses, ink fountains, and bag machines commenced operation on August 3, 2016. Therefore, Hilex is submitting an air operation permit revision application to obtain authorization for the recently constructed equipment, and to update the emission unit description for EU001. Hilex requests to incorporate the compliance requirements for Permit No. 0310298-007-AC in this permitting action as well. A brief description of the requested source classification and regulatory applicability changes is provided below.

- **Updated emission unit description – EU001**– Previously, the only emission unit permitted for the Jacksonville facility was Id No. 001 consisting of a flexographic printing facility with 12 printing presses and 32 ink fountains with bag machines. As part of the previous construction permitting action (Permit No. 0310298-007-AC), Hilex updated the emission unit by adding the new constructed equipment to the emission unit. Therefore, the new description for the emission unit includes a flexographic printing facility with 16 printing presses and 46 ink fountains with bag machines. There are no control devices installed at the Jacksonville facility for this emission unit.

1.3. PERMIT APPLICATION FORMS

The permit application forms [DEP Form No. 62-210.900(3)] required by Rule 62-4.050, F.A.C., have been completed electronically using the Electronic Permit Submittal and Processing (EPSAP) system Non-Title V form. Hilex's responsible official and the professional engineer (P.E.) certification have been provided electronically via EPSAP.

1.4. PERMIT APPLICATION FEE

The Jacksonville facility currently operates under a Non-Title V operation permit. Since the requested source classification and regulatory applicability changes will not change, a permit application fee of \$1500, as defined under Rule 62-4.050(4)(a)3., F.A.C., is required for this Non-Title V permit revision application.

1.5. PERMIT APPLICATION OVERVIEW

The Title V operation permit revision application is organized as follows:

- Section 2 describes the updated potential emissions calculations associated with the requested changes;
- Section 3 details the regulatory applicability analysis for the requested changes; and
- Appendix A contains detailed potential emissions calculations.

2. EMISSIONS CALCULATIONS

2.1. EMISSIONS CALCULATION UPDATES

On May 17, 2016, DEP issued a construction permit (No. 0310298-007-AC) for the addition of 4 new printing presses and 14 ink fountains with bag machines to the existing flexographic printing facility. Hilex has updated the emissions calculations for the emissions unit based on the addition of the new equipment for consistency.

EU001 –VOC Emissions tpy

VOC Emissions (tons/yr)

$$= \text{Maximum Hourly Ink Usage} \left(\frac{\text{lb}}{\text{hr}} \right) \times \text{No. of Fountains} \times \left(\frac{8760 \text{ hrs}}{1 \text{ yr}} \right) \times \text{VOC Content}(\%) \times \left(\frac{1 \text{ ton}}{2,000 \text{ lb}} \right)$$

ID No. 001 –HAP Emissions tpy

HAP Emissions (tons/yr)

$$= \text{Maximum Hourly Ink Usage} \left(\frac{\text{lb}}{\text{hr}} \right) \times \text{No. of Fountains} \times \left(\frac{8760 \text{ hrs}}{1 \text{ yr}} \right) \times \text{HAP Content}(\%) \times \left(\frac{1 \text{ ton}}{2,000 \text{ lb}} \right)$$

2.2. FACILITY-WIDE POTENTIAL EMISSIONS

This section of the operation permit revision application presents the updated facility-wide PTE based on the changes to the emissions calculation discussed above, and incorporated in Permit No. 0310298-007-AC. Complete documentation of emission factors and computation of potential emissions is provided in Appendix A.

Table 3-1. Facility-Wide Potential Emissions Summary

Pollutant	Previously Permitted PTE (tpy)	Increase in PTE (tpy)	Total (tpy)
NO _x	--	--	--
CO	--	--	--
VOC	4.01	1.75	5.76
PM ₁₀	--	--	--
PM _{2.5}	--	--	--
SO ₂	--	--	--
CO _{2e}	--	--	--
Total HAP	3.01	1.32	4.32 ¹

¹ Individual HAP emissions are under 10 tpy and total HAP emissions are under 25 tpy.

3. REGULATORY APPLICABILITY

The Jacksonville facility is subject to certain federal, state, and local air quality regulations. This section summarizes the air permitting requirements and key air quality regulations that apply to the operation of the facility. Specifically, applicability to the New Source Review (NSR), New Source Performance Standards (NSPS), FAC, and JEPB air regulations are addressed.

3.1. FEDERAL PERMITTING PROGRAMS

Federal permitting programs comprise requirements for construction of new sources or modification of existing sources (NSR) and for operation of major sources of air pollutants (Title V Operating Permit Program).

3.1.1. New Source Review

NSR requires that construction of new emission sources or modifications to existing emission sources be evaluated when significant net emission increases result. Two distinct NSR permitting programs apply depending on whether the facility is located in an attainment or nonattainment area for a particular pollutant; nonattainment NSR (NNSR) permitting is required for facilities located in nonattainment areas, while Prevention of Significant Deterioration (PSD) permitting is required for facilities located in attainment areas.

The Jacksonville facility is located in Duval County, which has been designated as an air quality maintenance area for the air pollutants ozone and particulate matter. Duval County is not a nonattainment area for any air pollutants. Therefore, the Jacksonville facility is not subject to NNSR permitting requirements for any criteria pollutants. The facility is potentially subject to PSD permitting requirements should the facility undergo a physical change or change in the method of operation.

Under PSD permitting rules, the major source threshold is 250 tpy unless the facility is listed specifically in 40 CFR §52.21 as having a lower 100 tpy threshold. Flexographic printing onto polyethylene bags is not on the list of 28 categories detailed in 40 CFR §52.21 with a lower threshold of 100 tpy. The Jacksonville facility is a minor source for the purposes of PSD permitting requirements as potential emissions are less than the 250 tpy major source threshold. The potential VOC emissions increase associated with the addition of four (4) printing lines results in an emissions increase less than the major source threshold (250 tpy) for the project itself. Therefore, the project is not considered a major modification, and the facility will continue to remain a minor source for the purposes of PSD permitting.

3.1.2. GHG Tailoring Rule²

Pursuant to EPA's decision to promulgate emission standards for GHG from light duty vehicles, GHG are "subject to regulation" under the Clean Air Act as "regulated NSR pollutants" for NSR permitting. On June 3, 2010, EPA promulgated an approach for tailoring the Clean Air Act permitting programs to address greenhouse gas (GHG)

² On June 23, 2014, the Supreme Court issued a significant decision in *Utility Air Regulatory Group v. EPA*, No. 12-1146 (L), that substantially restricts the authority of the U.S. Environmental Protection Agency (EPA) to regulate greenhouse gas emissions (GHGs) from stationary sources under the Clean Air Act's Prevention of Significant Deterioration (PSD) and Title V permitting programs. That decision, adopting one of the petitioners' principal arguments, holds that EPA may not impose permitting requirements on facilities based solely on their emissions of GHGs, but may regulate those emissions under these programs only if a facility is otherwise subject to permitting based on emissions of other air pollutants.

emissions (GHG Tailoring Rule).³ On May 1, 2014, EPA approved Florida's SIP,⁴ providing Florida with the authority to regulate GHG under its PSD program, to establish PSD applicability thresholds for GHG emissions at the same emissions thresholds and in the same timeframes as those specified by EPA in the GHG Tailoring Rule. Recently on June 23, 2014, however, the Supreme Court's decision in *Utility Air Regulatory Group v. EPA*, No. 12-1146 (L) ruled that EPA could not consider GHGs as an air pollutant to trigger PSD. Regardless of this ruling, Hilex Poly is, and will remain a minor PSD source, and potential GHG emissions are far below the Tailoring Rule thresholds.

3.1.3. Title V Operating Permit Program

Federally enforceable Title V operating permits are required for major stationary sources of air pollutants as defined in 40 CFR Part 70 and implemented in Chapter 403, Florida Statutes (F.S.) and F.A.C. Rules 62-4, 62-210, and 62-213. The Jacksonville facility is an existing minor source because potential VOC emissions are less than the major source threshold (100 tpy), as well as individual HAP and total HAP emissions less than the respective thresholds (10 tpy and 25 tpy). The Jacksonville facility continues to remain a minor source with respect to the Title V permitting program.

3.1.4. Florida Permitting Programs

Florida's SIP provides requirements for state permitting of construction or modification of emissions sources and operation of emission sources in Rules 62-210 and 62-212, F.A.C. Florida's permitting rules also provide for permitting exemptions and deferrals for insignificant modifications. Modifications to the facility (i.e., construction permits) remain subject to SIP permitting rules and requirements for revision of the operation permit. Hilex is submitting this Non-Title V operation permit revision application for the addition of new emission sources [four (4) printing lines].

3.2. REGULATORY APPLICABILITY

The Jacksonville facility is potentially subject to federal, state, and city regulations for air quality control. This section describes the applicability criteria and principal requirements of federal, state, and city regulations that result in permit conditions for the changes completed at Jacksonville facility.

3.2.1. New Source Performance Standards

NSPS require new, modified, or reconstructed sources to control emissions to the level achievable by the best-demonstrated technology as specified in the applicable provisions. Moreover, any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A, unless specifically excluded.

3.2.1.1. Non-Applicability of All NSPS

NSPS standards are developed for particular industrial source categories and the applicability of a particular NSPS to a facility can be readily ascertained based on the industrial source category covered. All NSPS are categorically not applicable to the Jacksonville facility.

³ Federal Register, Vol. 75, No. 106, 31514-31608, on June 3, 2010.

⁴ See Federal Register Vol. 79, No. 96, on Monday, May 19, 2014.

3.2.2. National Emission Standards for Hazardous Air Pollutants

National Emission Standards for Hazardous Air Pollutants (NESHAP) are emission standards for HAP and are applicable to major and area sources of HAP. A HAP major source is defined as having potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. An area source is a stationary source that is not a major source. Part 63 NESHAP allowable emission limits are established on the basis of a Maximum Achievable Control Technology (MACT) determination for a particular source category. NESHAP apply to sources in specifically regulated industrial source categories [CAA Section 112(d)] or on a case-by-case basis [Section 112(g)] for facilities not regulated as a specific industrial source type. The Jacksonville facility is an area source of HAP emissions.

Similar to NSPS, any source subject to a NESHAP is also subject to the general provision of NESHAP Subpart A, unless specifically excluded. Regulatory requirements for facilities subject to Part 63 NESHAP are incorporated by reference in Rule 62-204.800(11), F.A.C.

3.2.2.1. NESHAP Subpart HHHHHH - Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

NESHAP Subpart HHHHHH applies to new or existing spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium (target HAP) to any part or product made of metal or plastic that are not motor vehicles or mobile equipment at area sources of HAP. Though the Jacksonville facility is an area source of HAP, the new printing lines utilize inks applied to polyurethane bags that do not contain the previously identified target HAPs. Therefore, NESHAP Subpart HHHHHH does not apply to the existing and new printing lines at the Jacksonville facility.

3.2.2.2. Non-Applicability of Other NESHAP

NESHAP standards are developed for particular industrial source categories for either major or area sources of HAP and the applicability of a particular NESHAP to a facility can be readily ascertained based on the industrial source category covered. All other NESHAP are categorically not applicable to the Jacksonville facility.

3.2.3. Florida Administrative Code

The Florida Air Rules fall under two main categories; those regulations that are generally applicable (e.g., permitting requirements), and those that have specific applicability (e.g., PM standards for manufacturing equipment). Generally applicable facility provisions (e.g., restrictions on open burning) are not included in this discussion as the requirements are already captured in the current operation permit (No. 0310298-006-AO). Hilex requests the current requirements to be incorporated in the revised operation permit.

3.2.3.1. Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (RACT) Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO_x) Emitting Facilities

The downtown Jacksonville area in Duval County where the facility is located is identified as a VOC air quality maintenance area per Rule 62-204.340, F.A.C. RACT requirements including Specific RACT Emission Limiting Standards for Stationary Emission Units, Maximum Allowable Emission Rates; Circumvention, and Operation and Maintenance Plan are applicable to specific emission units that emit VOC or NO_x. The requirements of Rule 62-296.500, F.A.C., are applicable to various major VOC or NO_x sources specified in Rules 62-296.501 through 62-296.516, F.A.C.; however, none of these specified sources describes the Jacksonville facility.

Specifically, Rule 62-296.515, F.A.C., is not applicable to the Jacksonville facility due to potential VOC emissions less than 100 tpy for the flexographic printing operations.

The Jacksonville facility is located in Duval County and is therefore not subject to the requirements of Rule 62-296.500(1)(b) or 62-296.570, F.A.C. The new four (4) printing lines are therefore exempt from VOC and NO_x RACT requirements.

APPENDIX A: DETAILED POTENTIAL EMISSIONS CALCULATIONS

Hilex Poly Co., LLC Potential Emissions
Jacksonville Facility

VOC and HAP Emissions

<i>EUID</i>	<i>Maximum Ink Usage Per Fountain¹ lb/hr</i>	<i>Number of Existing Fountains</i>	<i>VOC Content² %</i>	<i>HAP Content² %</i>	<i>Potential VOC Emissions</i>		<i>Potential HAP Emissions</i>	
					<i>lb/hr</i>	<i>tpy³</i>	<i>lb/hr</i>	<i>tpy³</i>
001	7.15	32	0.40	0.30	0.92	4.01	0.69	3.01
Total Emissions					0.92	4.01	0.69	3.01

1. Maximum ink usage based on drying capacity of the printing presses at a conservative efficiency of 30% over an enthalpy change of 10° C.
2. VOC and HAP content are based on the corresponding maximum contents for all inks and coatings used by Hilex at the facility, except for Poly Defoamer. Note that this ink is used in a tiny quantity (80 lb in 2015) compared to the overall ink usage for the facility (481,016 lb for 2015), and therefore, has not been included in estimating the worst-case emissions.
3. Yearly emissions estimated using continuous operations (8,760 hr/yr).

Hilex Poly Co., LLC Potential Emissions
Jacksonville Facility

VOC and HAP Emissions

<i>EUID</i>	<i>Maximum Ink Usage Per Fountain¹ lb/hr</i>	<i>Number of New Fountains</i>	<i>VOC Content² %</i>	<i>HAP Content² %</i>	<i>Potential VOC Emissions</i>		<i>Potential HAP Emissions</i>	
					<i>lb/hr</i>	<i>tpy³</i>	<i>lb/hr</i>	<i>tpy³</i>
001	7.15	14	0.40	0.30	0.40	1.75	0.30	1.32
Total Emissions					0.40	1.75	0.30	1.32

1. Maximum ink usage based on drying capacity of the printing presses at a conservative efficiency of 30% over an enthalpy change of 10° C.

2. VOC and HAP content are based on the corresponding maximum contents for all inks and coatings used by Hilex at the facility, except for Poly Defoamer. Note that this ink is used in a tiny quantity (80 lb in 2015) compared to the overall ink usage for the facility (481,016 lb for 2015), and therefore, has not been included in estimating the worst-case emissions.

3. Yearly emissions estimated using continuous operations (8,760 hr/yr).

Hilex Poly Co., LLC Potential Emissions
Jacksonville Facility

<i>Pollutant</i>	<i>Facility Wide Potential Emissions (tpy)</i>
VOC	5.76
HAPs	4.32