

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

Vistakon Division
Johnson & Johnson Vision Care, Inc.
7500 Centurion Parkway
Jacksonville, FL 32256

Draft Permit No. 030535-005-AC
County: Duval

B. PROJECT

On April 27, 2007 the applicant, Vistakon, applied to the Department for a construction permit to modify the existing contact lens manufacturing facility located at 7500 Centurion Parkway, Jacksonville, Duval County, FL 32256. Additional information modifying the application was received on July 23, 2007, August 3, 2007 and August 10, 2007. This modification is for an increase in the production rate on manufacturing line nos. 18, 19, 20 and the installation of a collection system and catalytic oxidizer for the capture and destruction of volatile organic compounds (VOCs) from manufacturing line nos. 18, 19, 20.

II. RULE APPLICABILITY

The facility is located in an area designated as attainment for the air pollutant sulfur dioxide, as unclassifiable for the air pollutant particulate matter less than or equal to ten (10) micrometers, in an air quality maintenance area for ozone, and in the area of influence of an air quality maintenance area for particulate matter pursuant to Chapter 62-204, Florida Administrative Code (FAC), and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

The facility is a major source of air pollution because the potential emissions of regulated air pollutants are greater than 100 tons per year pursuant to Chapter 62-210, FAC, and JEPB Rule 2.301.

The project shall be subject to the provisions of General Pollutant Emission Limiting Standards, Volatile Organic Compounds Emissions or Organic Solvents Emissions, Rule 62-296.320(1)(a), FAC, and JEPB Rule 2.1001, Unconfined Emissions of Particulate Matter, Rule 62-296.320(4)(c), FAC, and JEPB Rule 2.1001, and Rule 62-296.320(2), FAC, Rule 2.1001, JEPB, and City of Jacksonville Ordinance Code, Chapter 376 limiting the emission of Objectionable Odors. After the modification the facility potential to emit for VOCs will be less than 250 tons per year thus classifying the facility as minor for purposes of Prevention of Significant Deterioration (PSD) regulations.

III. TECHNICAL EVALUATION

This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

Unconfined particulate matter emissions from materials handling operations shall be controlled by using the following reasonable precautions.

- Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
- Enclosures or covering of conveyor systems.

General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

The VOC collection system and catalytic oxidizer shall be operated in accordance with the manufacturer's recommendations.

The owner/operator shall maintain monthly records of the following:

- a. Amount of all VOC and hazardous air pollutants (HAP) containing process substances used (gallons)
- b. VOC content of all process substances used (pounds per gallon)
- c. HAP content of all process substances used (pounds per gallon)
- d. VOC emissions (pounds per month)
- e. Individual HAP emissions (pounds per month)
- f. Total HAP emissions (pounds per month)

Records shall be maintained for a minimum of five (5) years and made available to the Department upon request.

Quarterly reports shall be submitted to the Department describing VOC/HAP contents and emissions. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The final report, which is due by the 30th of January for the quarter of October - December, shall include a synopsis of the preceding year.

An Operation and Maintenance Plan shall be attached to and shall be part of this permit for the plastic collection system control devices. All activities shall be performed as scheduled and recorded. Data shall be made available to the Department upon request. Records shall be maintained on file for a minimum period of five (5) years.

IV. CONCLUSION

Based upon information provided by the applicant, the Department has reasonable assurance that the existing contact lens manufacturing facility and proposed modifications, as described in the application and subject to the conditions proposed herein, will not cause, or contribute to a violation of any ambient air quality standard or other technical provision of Chapters 62-296 and 62-297, FAC, JEPB Rules 2.1001 and 2.1101.