

ENVIRONMENTAL AND COMPLIANCE DEPARTMENT



**Permittee:**

Vistakon  
Division of Johnson and Johnson Vision Care, Inc.  
7500 Centurion Parkway  
Jacksonville, FL 32254

**Draft Permit No.:** 0310535-006-AC

**Facility ID No.:** 0310535

**SIC No.:** 38

**Project:** Contact Lens Manufacturing Facility

This permit is for the modification of the existing contact lens manufacturing process. This facility is located at 7500 Centurion Parkway, Jacksonville, Duval County, FL 32256; UTM Coordinates: Zone 17, 447.30 km East and 3345.41 km North; Latitude: 30° 14' 21" North and Longitude: 81° 32' 52" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Florida Administrative Code (FAC) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Environmental and Compliance Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

**\*Title V Air Operation Permit Revision Application Due Date:**

**Expiration Date:**

\* See Section II, Subsection B, Specific Condition No. 7

**Environmental and Compliance Department  
Environmental Quality Division**

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**Robert Steven Pace, P.E., Manager  
Air Quality Branch**

RSP/JW

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## **Section I. Facility Information**

### **Subsection A. Facility/Project Description**

This modification is for the installation of a collection system and catalytic oxidizer for the capture and destruction of volatile organic compounds (VOCs) from manufacturing line nos. 13, 14, 15, 19, 20, and 25.

This permit is for the contact lens manufacturing facility. The facility consists of 31 contact lens manufacturing lines, five natural gas fired steam boilers, each with a maximum of  $8.4 \times 10^6$  BTU per hour heat input, and six (four existing and two new) 8,000 gallon isopropyl alcohol storage tanks. The manufacturing lines include polystyrene injection molding for contact lens production, hydration, packaging, printing operations and waste plastic collection system. Research and development activities are performed on site.

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.

### **Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions**

<u><b>EU No.</b></u>	<u><b>EU Description</b></u>
001	Contact Lens Manufacturing

### **Subsection C. Relevant documents**

Air construction permit no. 0310535-005-AC  
Air construction permit application received January 30, 2008  
Additional information received March 3, 2008

## **Section II. Facility Wide Conditions**

### **Subsection A. General Conditions**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific process and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

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4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:

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- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - 1. The date, exact place, and time of sampling or measurements;
  - 2. The person responsible for performing the sampling or measurements;
  - 3. The date(s) analyses were performed;
  - 4. The person responsible for performing the analyses;
  - 5. The analytical techniques or methods used;
  - 6. The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

[Rule 62-4.160, FAC, and Rule 2.1301, Jacksonville Environmental Protection Board (JEPB)]

### **Subsection B. Specific Conditions**

- 1. Permittee shall notify the Department fifteen (15) days prior to EU testing.  
[Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, JEPB]
- 2. Copies of the test report(s) shall be submitted to the Department within forty-five (45) days of completion of testing.  
[Rule 62-297.310(8)(b), FAC, Rule 62-297.310(8)(c), FAC and Rule 2.1101, JEPB]
- 3. Stack sampling facilities shall comply with the requirements of Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB.
- 4. Any revision(s) to a permit (and application) shall be submitted to and approved by the Department prior to implementing.  
[Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB]
- 5. Control equipment shall be provided with a method of access that is safe and readily accessible.  
[Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB]
- 6. Permittee shall submit an annual operation report to the Department for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before March 1.

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[Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]

7. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operation Permit revision with records and test results, to the Department two hundred twenty five (225) days prior to the expiration date of the construction permit or 90 days after completion of testing, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid Title V Air Operation Permit to operate.  
[Rule 62-210.300(2), FAC, and Rule 2.301, JEPB]

8. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.  
[Rule 62-4.080(3), FAC, and Rule 2.1301, JEPB]

9. Prevention of Accidental Releases (Section 112(r) of CAA).

- a. As required by rule, inspection, or change in process the owner or operator shall submit a Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
- b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
- c. The owner or operator shall submit the required annual registration fee to the DCA upon initial submission of the RMP to the CEPPO RMP reporting center and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, FS, and Rule 9G-21, FAC.

Any required written reports, notification, certifications, and data required to be sent to the DCA, should be sent to:

Department of Community Affairs  
Division of Emergency Management  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
Telephone: (850) 413-9921, FAX: (850) 488-1739

Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center  
Post Office Box 3346  
Merrifield, VA 22116-3346  
Telephone: (703) 816-4434

Any required reports to be sent to the National Response Center, should be sent to:

National Response Center  
EPA Office of Solid Waste and Emergency Response  
USEPA (5305 W)  
401 M Street, SW  
Washington, D.C. 20460  
Telephone: 1-800-424-8802

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10. The permittee shall submit all compliance related notifications and reports required of this permit to:

Environmental and Compliance Department  
Environmental Quality Division  
117 West Duval Street, Suite 225  
Jacksonville, FL 32202  
Telephone: (904) 630-4900  
Fax: (904) 630-3638

11. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted, providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period, unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1301, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.  
[Rule 62-210.700, FAC, and Rule 2.201, JEPB]

### **Section III. Emission Units and Conditions**

#### **Emission Unit No. 001- Contact Lens Manufacturing**

Emission Unit Description: Contact lenses are produced on 31 manufacturing lines consisting of polystyrene injection molding equipment. Other activities included in the manufacturing process are waste plastic collection system, lens packaging, printing operations and trial runs of experimental monomers. The operation includes five existing  $8.4 \times 10^6$  Btu per hour natural gas boilers, six (four existing and two new) approximately 8,000 gallon capacity tanks storing isopropyl alcohol and:

1. (Air Construction Permit No. 0310535-005-AC) A new collection system and catalytic oxidizer for the capture and destruction of volatile organic compounds (VOC) from manufacturing line nos. 26, 27, and 28 (formerly numbered 18, 19, and 20 respectively).
2. A new collection system and catalytic oxidizer for the capture and destruction of volatile organic compounds (VOC) from manufacturing line nos. 13, 14, 15, 19, 20, and 25

Control Device(s) Description: **Particulate matter** emissions from the waste plastic and packaging system are controlled by three dust collectors as follows:

National Turbine 48X86 Dual Cartridge Pulse jet - Estimated nominal airflow is 5700 dscfm

Hosokawa Mikropul Reverse Air Flow 3GT121S-8C - Estimated nominal airflow is 7500 dscfm

Hosokawa Mikropul Reverse Air Flow 36S8 - Estimated nominal airflow is 2000 dscfm

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VOC emissions from manufacturing line nos. 26, 27, and 28 are controlled as follows:

Air Clear (or equivalent) catalytic oxidizer with an exit temperature of approximately 630 degrees Fahrenheit - Estimated nominal airflow is 2500 dscfm.

VOC emissions from manufacturing line nos. 13, 14, 15, 19, 20, and 25 are controlled as follows:

Air Clear (or equivalent) catalytic oxidizer with an exit temperature of approximately 880 degrees Fahrenheit - Estimated nominal airflow is 5000 dscfm.

It is noted that the process gas exit temperature to the atmosphere following the heat exchanger for each of the above catalytic oxidizers is approximately 80 degrees Fahrenheit.

#### **Essential Potential to Emit (PTE) Parameters**

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.  
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

#### **Emission Limitations and Standards**

2. 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. VOC emissions shall be limited to 249.9 tons per year (calendar basis) to classify the facility minor for Prevention of Significant Deterioration (PSD) purposes.  
[Applicant's request, Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
3. 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.  
[Rule 62-296.320(4)(c)2., FAC, and Rule 2.1001, JEPB]
4. 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.  
[Rule 62-296.320(2), FAC, and Rule 2.1001, JEPB]
5. The VOC collection systems and catalytic oxidizers shall be operated in accordance with the manufacturer's recommendations.  
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

#### **Test Methods and Procedures**

6. Initial VOC testing shall be conducted on the inlet and outlet to the catalytic oxidizer controlling collected VOC emissions from manufacturing line nos. 13, 14, 15, 19, 20, and 25. Testing shall be conducted in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 25A. Testing shall be conducted not later than 180 days after completion of the VOC collection system and catalytic oxidizer for manufacturing line nos. 13, 14, 15, 19, 20, and 25.  
[Rule 62-297.310(4)(a), FAC, and Rule 2.1101, JEPB]

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**Recordkeeping and Reporting Requirements**

7. 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.

[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

8. 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.

[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

9. An Operation and Maintenance Plan shall be attached to and shall be part of this permit for the waste 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.

[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]