

OPERATIONS & MAINTENANCE PLAN

VISTAKON, Johnson & Johnson Vision Products, Inc.
Jacksonville, Florida

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1.0 INTRODUCTION

In May 2005, Vistakon, a subsidiary of Johnson & Johnson Vision Products, Inc., applied for an Air Construction Permit for their contact lens manufacturing facility located at 7500 Centurion Parkway, in Jacksonville, Duval County, Florida. An Air Construction Permit (Permit No. 0310535-001-AC) for this facility was issued by the City of Jacksonville's Environmental Resource Management Department, Environmental Quality Division in September 2005. Specific Permit Condition No. 6 of this permit requires that Vistakon prepare an Operation and Maintenance Plan (O&M Plan) for the control equipment (baghouses and fabric filters) used to control particulate matter (PM) emissions from the waste plastic systems citing Florida Administrative Code (F.A.C.) Rule 62-4.070(3) and City of Jacksonville's Environmental Protection Board's Rule 2.1301 as the basis of this requirement.

The following O&M Plan is designed to satisfy this requirement.

1.1 General Requirements for the O&M Plan

Rule 62-296.700(6) F.A.C. specifies the information to be included in a suitable O&M Plan. Generally, for baghouses and fabric filters, the O&M Plan shall include a schedule for recording performance parameters for the control devices,

collection systems, and auxiliary equipment. Records of inspections, maintenance and performance data of this equipment shall be retained for a minimum of two years and shall be made available to the regulatory authorities upon request. The performance parameters shall include physical, chemical, or electric characteristics as are applicable to the particular emissions unit, and which are indicators of the condition, operating rates and efficiencies.

The O&M Plan shall include identification of control devices for emissions units subject to this rule including: manufacturer, model and number, type of PM control device, design flow rate, pressure drop, and efficiency rating.

1.2 Process Description

Vistakon owns and operates a contact lens manufacturing facility. One step in the manufacturing process of contact lenses is the production of the lens molds. These are manufactured by injection molding. Once the lenses are formed, the molds are discarded, and go into the waste plastic system. Another step in the manufacturing of contact lenses is the production of packaging. Defective packaging also goes into the waste plastic system.

Each waste plastic system consists of a pneumatic transfer system, cyclones to remove waste plastic from the air stream, and a baghouse or fabric filter to control PM emissions. PM emissions from the lines are controlled using National

Turbine/ 48 x 86 Dual Cartridge Pulse Jet fabric filters and Hosokawa-MikroPul / 121S-8C baghouses.

1.3 Control Equipment Specifications

The control equipment data for the three dust collectors at Vistakon are summarized in Table 1.

TABLE 1

EQUIPMENT SPECIFICATIONS AND RECOMMENDED OPERATION PARAMETERS

| | A | B | C |
|------------------------|-----------------------------------|--------------------------------|--|
| Manufacturer | Hosokawa MikroPul | Hosokawa MikroPul | National Turbine |
| Model Number | 3GT 121S-8C | 36S8 | 48x86 Dual Cartridge Pulse Jet |
| Type of Unit | Reverse Air Flow | Reverse Air Flow | Pulse Jet |
| Design Flow Rate | 7,500 cfm | 2,000 cfm | Pulse Jet |
| Efficiency Rating | 99.9% | 99.9% | 99.9% |
| Pressure Drop | 0.1 to 0.95 inches of water gauge | 0.1 to 2 inches of water gauge | 2 to 10 inches of water gauge |
| Air to Cloth Ratio | 6.25 feet per minute | 5.60 feet per minute | 19.1 feet per minute |
| Filter Media | Polyester Bag | Polyester Bag | Polyester-Bottom Access-Dual Cartridge |
| Inlet Gas Temp. | Ambient | Ambient | Ambient |
| Outlet Gas Temp. | Ambient | Ambient | Ambient |
| Bag Cleaning Mechanism | Compressed air reverse flow | Compressed air reverse flow | Compressed air pulse jet mechanism |

2.0 OPERATION AND MAINTENANCE

In order to ensure the correct performance of baghouses and fabric filters, an inspection schedule is necessary, as well as the timely repair and replacement of damaged or malfunctioning equipment.

2.1 Observations, Checks, and Operation

The following observations, checks and operations apply to these sources and shall be conducted on the schedule specified:

Daily

1. Check pressure drop.
2. Observe stack (visual).
3. Walk through system listening for proper operation (audible leaks, proper fan and motor functions, etc.).
4. Note any unusual occurrence in the process being ventilated.
5. Assure that dust is being removed from the system.

Weekly

1. Check reverse air pressure, as applicable.
2. Check bag/cartridge cleaning sequence to ensure that all valves are opening and closing properly, as applicable.
3. Check pressure drop indicating equipment for plugged valves.

Monthly

1. Inspect screw conveyor and air lock bearings for lubrication.
2. Operate all damper valves (isolation, by-pass, etc.).
3. Inspect housing for corrosion.

Quarterly

1. Inspect baffle plate for wear.
2. Check screw conveyor flighting.

Semi-Annually

1. Inspect fans for corrosion and material build-up.

Annually

1. Thoroughly inspect bags/cartridges and replace as needed.
2. Check all bolts.
3. Check welds.
4. Inspect hopper for wear.
5. Spot check bag tension inside bag collector.
6. Check gaskets on all doors.

Additionally, a spare parts inventory will be maintained to reduce downtime due to common malfunctions.

2.2 Recordkeeping

Records of inspection, maintenance and performance parameter data shall be retained as applicable and shall be made available to the RESD upon request.