Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Transitions Optical, Inc.
9251 Belcher Road
Pinellas Park, FL 33782

Authorized Representative:
Mr. Vincent Sweeney, Plant Manager

Air Permit No. 1030209-030-AO
Air Operation Permit

Transitions Optical, Inc.
Pinellas County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of Transitions Optical, Inc., which is an Ophthalmic Goods manufacturer (Standard Industrial Classification No. 3851). This project renews air operation permit 1030209-028-AO. The facility is located in Pinellas County at 9251 Belcher Road in Pinellas Park, Florida. The UTM coordinates are Zone 17, 329.3 kilometers (km) East, and 3082.5 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements and Facility-wide Specific Conditions); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-470-5700.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e)

A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

1030209-030-AO Effective Date: December 21, 2015
Renewal Application Due Date: October 22, 2020
Expiration Date: December 21, 2020

Executed in Hillsborough County, Florida.

for

_____
Pamala Vazquez
Interim Program Administrator
Permitting & Waste Cleanup Program
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Vincent Sweeney, Transitions Optical, Inc., vsweeney@transitions.com
Christine Appel, Transitions Optical, Inc., cappel@transitions.com
Bob Baker, Baker Environmental Engineering, Inc., baker@atlantic.net
Sherrill Culliver, Pinellas County Air Quality Division, sculliver@co.pinellas.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes December 21, 2015
(Clerk) (Date)

FACILITY DESCRIPTION

This is an ophthalmic-lens coating and processing facility. It is a production as well as a research and development facility where new equipment, processes and coatings are continuously being improved and developed for full scale manufacturing and then packaged and sent abroad to support the businesses at other locations.

The facility consists of the following emissions units (EUs).

EU No.	Emission Unit Description
001	Ophthalmic Lenses Coating and Processing
002	Lens Shaping Area No. 1 with baghouse
009	Lens Shaping Area No. 3 with baghouse

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations	
Rule 62-210.300, F.A.C., Permits Required	Facility wide
Rule 62-296.320, F.A.C. General Pollutant Emission Limiting Standards	Facility wide
Rule 62-297.310, F.A.C. General Compliance Test Requirements	002, 009

EXEMPT EMISSION SOURCES/ACTIVITIES

- Two boilers (5.0 MMBTU/hr. & 5.4 MMBTU/hr.). Maximum VOC and HAP emissions while operating 8760 hours/year are 0.22 TPY and 0.18 TPY respectively.
  Rule 62-210.300(3)(a)33., F.A.C.

- One emergency 600 hp 400 kW (diesel-powered) generator, rated at 3.8 MMBTU/hr. Maximum VOC and HAP emissions burning 32,000 gallons of diesel fuel annually are 0.75 TPY and 0.01 TPY respectively.
  Rule 62-210.300(3)(a)35., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOCs), Individual HAPs) and Total HAPs)

PERMIT HISTORY/AFFECTED PERMITS

This permit renews and replaces current Operation Permit 1030209-028-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air and Solid Waste Permitting Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-470-5700
   E-mail: SWD_Air_Permitting@dep.state.fl.us

   All documents related to applications for permits to operate an emissions unit shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division. The mailing address, phone number and e-mail address of the Local Air Program is:

   Pinellas County Air Quality Division
   509 East Avenue South, Suite 138
   Clearwater, Florida 33756
   Telephone: 727-464-4422
   E-mail: Airquality@pinellascounty.org

   All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above e-mail address and/or address.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. To properly apply for an operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

   c. copies of the most recent compliance test reports required by Specific Condition No. **B.7.**, if not previously submitted;

   d. copies of the most recent month of records/logs specified in Specific Condition Nos. **A.4.** and **B.8.**; and

   e. any proposed revisions to the most recently approved O & M Plan (Agency name) *(see Specific Condition No. **B.9.**)*.

   [Rules 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Approved Local Program. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.

   [Rule 62-210.370(3), F.A.C.]

   {Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

FACILITY-WIDE REQUIREMENTS

9. Volatile Organic Compounds Emissions or Organic Solvents Emissions – No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. All equipment, pipes, hoses, lids, fittings, etc. shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials containing VOCs/OSs/HAPs.
   [Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1030209-026-AC]

10. Objectionable Odor Limitation - The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. An "Objectionable Odor" is defined as 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.
    [Rule 62-296.320(2), F.A.C. and Pinellas County Code, Section 58-178]

A. EU 001 Ophthalmic Lenses Coating and Processing

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Ophthalmic Lenses Coating and Processing

This emission unit includes all sources of VOC and HAP emissions resulting from ophthalmic lens coating processes. The sources include:

- Nine business units where pre-manufactured lenses that have been etched and edged (see EU Nos. 002 and 009) undergo multiple cleaning, coating and curing stages resulting in proprietary treated photochromic lenses. The business units contain equipment such as ovens, coaters and conveyors. The equipment and processes within a business unit may change as new products and methods are tested and developed. Changes of equipment and processes within these 9 business units are allowed as long as the emission limits are not exceeded.
- Small table top coaters used by researchers to apply coating solutions to test lenses.
- Lens and box ink stampers that imprint identification codes on some individual lenses and lens boxes.
- Testing for a variety of qualities such as coating hardness, scratch resistance and photochromic capability.
- Solvent usage.
- Parts cleaning.
- A photochromic-solution mixing area where small (approximately 100 liters or less) batch-mixing of proprietary, photochromic formulations occur once per shift. Fine powders and solids may be components of formulations and mixing these materials may result in particulate emissions during the mixing process.

VOC, HAP and PM emissions resulting from these activities are exhausted to the atmosphere uncontrolled.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum number of business units is nine (9).
[Rule 62-210.200(PTE), F.A.C.]

A.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.3. Emissions Standards:

a. Volatile Organic Compounds (VOCs) are limited to 77.1 tons for any consecutive 12 month period. [Construction Permit No. 1030209-021-AC and Rule 62-296.320, F.A.C.]

b. Any individual Hazardous Air Pollutant (HAP) is limited to 9.95 tons for any consecutive 12 month period. [Construction Permit No. 1030209-021-AC and Rule 62-296.320, F.A.C.]

c. Total HAPs are limited to 21.69 tons for any consecutive 12 month period.

[Rule 62-296.320, F.A.C. and Construction Permit No. 1030209-021-AC]

{Permitting Note: These emission limits include exempt source emissions}

RECORDS AND REPORTS

A.4. Monthly Log for VOCs and HAPs: The permittee shall keep the following records monthly based on a facility-wide mass balance. At the permittee's option, "purchases" may be used where "usage" is specified. If this option is utilized, no materials may be used which are not purchased.

a. Facility Name and Emission Unit ID No. (1030209, EU 001);

b. total quantity (lbs.) of each VOC containing material (e.g., coatings, inks, solvents, etc.) used for the month;

c. VOC content (percent by weight) of each VOC containing material (e.g., coatings, inks, solvents, etc.) used for the month;

d. calculated monthly total (tons/month) VOC emissions (based upon b. and c. above);

e. cumulative total of VOC emissions for the most recent 12 consecutive month period (tons per 12 consecutive month period).

f. total quantity (lbs.) of each HAP containing material (e.g., coatings, inks, solvents, etc.) used for the month;

g. HAP content (percent by weight) of each HAP containing material (e.g., coatings, inks, solvents, etc.) used for the month;

h. calculated monthly total (tons/month) HAP emissions for each individual HAP and for total HAPs (based upon f. and g. above); and

i. cumulative total of the HAP emissions for each individual HAP and total HAPs for the most recent 12 consecutive month period (tons per 12 consecutive month period).

[Rule 62-4.070(3), F.A.C.]

A.5. Daily Log for VOCs and HAPs: If any month results in facility-wide total HAP or individual HAP emissions exceeding 90% of the Title V threshold limits (i.e., 9.0 tons of individual HAPs or 22.5 tons of total HAPs) for the most recent consecutive 12-month period, the facility shall keep daily records beginning on the next operational day following when the monthly calculation was completed. The daily records shall include cumulative 12-month emission totals to demonstrate compliance with the emission limitations of Specific Condition No. 10. When one month of daily records is completed, the facility shall make a determination if daily recordkeeping must be continued. If HAP emissions continue to exceed 90% of the Title V threshold limits, then daily recordkeeping shall continue. If these emissions do not exceed 90% of the Title V threshold limits, then the facility may return to monthly recordkeeping. The use of purchases as a proxy for usage is not allowed for daily recordkeeping.

[Rule 62-4.070(3), F.A.C.]

A.6. Records Completion and Retention - The monthly records required by Specific Condition **A.4.** shall be completed by the end of the following month. Daily records, if required by Specific Condition **A.5.** shall be completed within five (5) business days. The records shall be maintained in a form suitable for inspection by the Department and/or Pinellas County Air Quality Division upon request and shall be retained for at least a three (3) year period.

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]

B. EUs 002 & 009, Lens Shaping Areas

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
002	Lens Shaping Area No. 1 with baghouse
009	Lens Shaping Area No. 3 with baghouse

Equipment in these areas are used to shape lenses prior to going through the coating processes of EU 001. Up to twenty (20) pieces of lens shaping equipment in EU 002 and six (6) pieces of lens making equipment in EU 009 may be utilized at one time.

Plastic particulate matter from EU 002 is collected by hoods at each piece of equipment and is controlled by a common Airotech reverse pulse fabric filter dust collector, Model 5P-130-8-(10) BA. A Dust-Hog Supra-Blast Dust Collector, Model SBD8-2, is used as a backup control device. The back up dust collector does not operate simultaneously with the primary dust collector.

Plastic particulate matter from EU 009 is collected by hoods at each piece of equipment and is controlled by a common Ultra-Conic cartridge filter dust collector, Model UC-412.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity: The maximum number of pieces of lens shaping equipment that can operate in each lens shaping area is as follows:

a. EU 002 - Lens Shaping Area No. 1 – twenty (20) pieces of equipment.

b. EU 009 - Lens Shaping Area No. 2 – six (6) pieces of equipment.

[Rule 62-210.200 (“Potential to Emit”), F.A.C.; Construction Permit 1030209-026-AC]

B.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

B.3. Emissions Standards:

a. Visible Emissions As an indicator that the particulate control devices are operating properly, the Department has determined there should be no visible emissions (≤5% opacity) from each device.

[Construction Permit No. 1030209-026-AC and Rule 62-296.320, F.A.C.]

TESTING REQUIREMENTS

B.4. Compliance Tests Prior to Renewal: Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see Appendix D – Common Testing Requirements compliance tests shall be performed for visible emissions prior to obtaining a renewed operation permit to demonstrate compliance with the emission limits in Specific Condition **B.3.**

[Rules 62-210.300(2)(a) and 62-297.310(8)(b), F.A.C.]

{Permitting Note: Tests which are only required once during the term of a permit prior to obtaining a renewed permit should be performed roughly five years from the previous test.}

B.5. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(9), F.A.C.]

B.6. Test Methods: Required tests shall be performed in accordance with the following reference method:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

B.7. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the number of pieces of equipment being utilized during the test.

[Rule 62-297.310(10), F.A.C.]

B.8. Operational Data: The permittee shall comply with the following:

a. If the most recent visible emission test for Emission Unit No. 002 or Emission Unit No. 009 is not conducted with its associated maximum allowable pieces of equipment operating, then the permittee shall daily record the maximum number of pieces of equipment operating simultaneously for that emission unit.

b. In order to ensure the 2 baghouses associated with each emission unit are not operating simultaneously, the permittee shall daily record for each emission unit, which baghouse was operating.

[Rule 62-4.070(3), F.A.C.]

B.9. Operation and Maintenance (O & M) Plan for Particulate Matter (PM) Control: For air pollution control devices and collection systems, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of each control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

a. Performance Parameters:

i. The operating parameters of each baghouse.

ii. The timetable for the routine maintenance of each baghouse as specified by the manufacturer.

iii. The timetable for routine periodic observations of each baghouse sufficient to ensure proper operation.

iv. A list of the type and quantity of required spare parts for each baghouse, which are stored on the premises.

b. Operation and Maintenance Log:

i. When maintenance and observations were performed.

ii. What maintenance and observations were performed.

iii. Who performed said maintenance and observations.

iv. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C. and Pinellas County Code, Sect. 58-128]