



# Florida Department of Environmental Protection

Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## FINAL PERMIT

### PERMITTEE

Hit Promotional Products, Inc.  
7150 Bryan Dairy Road  
Largo, Florida 33777

#### Authorized Representative:

Mr. Arthur W. Schmidt IV, President

Air Permit No. 1030313-008-AF

Permit Expires: 01/20/2015

Site Name : Hit Promotional Products

Minor Air Federally Enforceable State

Operating Permit (FESOP)

Project Name: FESOP Renewal

This is the final air operation permit, which authorizes the renewal of Air FESOP 1030313-007-AF. Hit Promotional Products (Standard Industrial Classification No. 3999) is located in Pinellas County at 7150 Bryan Dairy Road in Largo, Florida. The UTM coordinates are Zone 17, 328.91 km East, and 3084.06 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

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.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for

notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (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 when and how the petitioner received notice of the agency decision;
- (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Department'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 of the Florida Administrative Code.

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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, 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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Mara Grace Nasca January 20, 2010  
Mara Grace Nasca Effective Date  
District Air Program Administrator  
Southwest District

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 01-20-2010 to the persons listed below.

Mr. Arthur W. Schmidt IV, Hit Promotional Products, Inc. (jrschmidt@hitpromo.net)  
Mr. Marvin Scott, Environmental Engineering Consultants, Inc. (mscott@eec-tampabay.com)  
Mr. Gary Robbins, PCDEM-Air Quality Division (grobbs@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.

Patricia Schubert 01-20-2010  
(Clerk) (Date)

## SECTION 1. GENERAL INFORMATION (FINAL)

### FACILITY AND PROJECT DESCRIPTION

#### Hit Promotional Products

The facility prints company names, logos, customized messages, etc. on pens, foam pads, cups, key chains and other miscellaneous products. Some of the products are manufactured at the facility. The printing is accomplished by various methods including: screen printing, hot stamping, UV cured inks, and ceramic printing. The inks and cleanup solvents used in the operation of the printing presses may contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). VOCs and HAPs are emitted fugitively from various points throughout the facility (doors, windows, ventilation system, etc.).

The existing facility consists of the following emissions units.

| Facility ID No. 1030313 |                                       |
|-------------------------|---------------------------------------|
| ID No.                  | Emission Unit Description             |
| 001                     | Printing and Manufacturing Operations |

*NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

#### Exempt Emission Units/Activities

The following emissions units and/or activities are considered insignificant in accordance with the provisions of Rules 62-4.040(1)(b), 62-210.300(3)(a) or 62-210.300(3)(b), F.A.C. The expected emissions will not cause this facility to exceed Title V permitting thresholds; however changes in expected operations or additions to this list should be evaluated for their effect on Title V permitting.

- Manually operated tools used for buffing, polishing, carving, cutting, drilling, routing, sanding, sawing, trimming, machining, surface grinding, or turning.
- Polishing and venting operations vented indoors.
- Embroidery of hats and other materials.
- Ceramic printing of hot melt inks on mugs and other glassware.
- LEHR natural gas fired oven for setting ceramic inks (maximum of 4,000,000 ft<sup>3</sup> natural gas/year).
- Hot stamping operations where no solvent based products are used.
- Electrically heated polypropylene molding machine for manufacturing of key chains.
- Miscellaneous propane use and forklift operations (maximum of 1,200 gallons propane/year).
- Acetone usage.
- Soldering and equipment repair operations.
- UV ink printing.

#### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

## **SECTION 1. GENERAL INFORMATION (FINAL)**

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- This facility is a synthetic non-Title V source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

### **PERMIT HISTORY/AFFECTED PERMITS**

Replaces Permit No.1030313-007-AF

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection  
Southwest District Office  
Air Resource Management Section  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Department of Environmental Management (PCDEM), Air Quality Division. The mailing address and phone number is:

Pinellas County Department of Environmental Management  
Air Quality Division  
300 South Garden Avenue  
Clearwater, Florida 33756  
Telephone: 727-464-4422

3. Appendices: The following Appendices are attached as part of this permit:

- a. Appendix A. Citation Formats and Glossary of Common Terms;
- b. Appendix B. General Conditions;
- c. Appendix C. Common Conditions;
- d. Appendix D. Common Testing Requirements; and
- e. Appendix E. Equipment List.

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: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.  
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.  
[Rule 62-210.370(3), F.A.C.]
8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Department of Environmental Management, Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit. 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.; and
  - c. copies of the most recent two months of records/logs specified in Specific Condition No(s). A.9., A.10., and A.11(if applicable).

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

### SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

This section of the permit addresses the following emissions unit.

| ID No. | Emission Unit Description   |
|--------|---|
| 001    | Printing and Manufacturing Operations - Includes printing, screening, gluing, manufacturing and cleaning. |

#### PERFORMANCE RESTRICTIONS

- A.1. Hours of Operation: The hours of operation are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

- A.2. VOC/HAP Emission Limitations: Emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), as defined in Rule 62-210.200, F.A.C., shall not exceed the following:

| Pollutant      | Emission Limitation                           |
|----------------|---|
| VOCs           | 44.5 tons per any 12 consecutive month period |
| Individual HAP | 9.4 tons per any 12 consecutive month period  |
| Total HAPs     | 20.0 tons per any 12 consecutive month period |

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030313-006-AC]

- A.3. General Standards: Objectionable Odor: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is 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. If the Department and/or Pinellas County Department of Environmental Management (PCDEM) receives a valid odor complaint, the Department and/or PCDEM reserves the right to require that odor control measures/work practices be implemented.  
[Rules 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]
- A.4. General Standards: Volatile Organic Compound Emissions and/or Organic Solvent Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

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### SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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- a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;
- b. all VOC/OS from washings (equipment clean up) shall be directed into containers that prevent evaporation into the atmosphere;
- c. tightly cover or close all VOC/OS containers when they are not in use;
- d. prevent excessive air turbulence across exposed VOC/OS; and
- e. immediately confine and clean up VOC/OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit 1030313-006-AC]

- A.5. General Standards: Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1, F.A.C.]

- A.6. General Standards: Unconfined Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. Unconfined particulate emissions generated from activities such as trimming, sanding, sawing, machining, surface grinding, or other such activities shall be controlled by good work practices and normal good housekeeping procedures.  
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1030313-006-AC]

- A.7. Unconfined Particulate Matter Opacity: As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. A.6. are adequate, visible emissions from the facility should not exceed 5%. If this value is exceeded, it shall not be a violation in and of itself, but an indication that additional control precautions and/or work practices beyond those of Specific Condition No. A.6. may be necessary.  
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030313-006-AC]

- A.8. Emissions Calculations: In order to document compliance with Specific Condition No. A.2., the permittee shall calculate VOC and HAP emissions based on the following methodologies:

- a. Flexographic Printing Operations:

Emissions = Flexographic ink usage (gallons) x VOC or HAP content (pounds/gallon) x 0.98.\*

(\*Permitting Note: This is based on a 2% credit for VOC retention in the product.)

### SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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- b. All other printing operations:

Emissions = Usage (gallons) x VOC or HAP Content (pounds/gallon).

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030313-006-AC]

#### RECORDS AND REPORTS

A.9. VOC Recordkeeping: In order to document compliance with the VOC emission limitations of Specific Condition No. A.2., the permittee shall maintain monthly VOC records. The records must clearly indicate which materials are used solely in flexographic printing and therefore qualify for the 2 percent VOC retention credit (*see Specific Condition No. A.8.a.*). The records shall contain, at a minimum, the following:

- a. facility name, facility ID No., emission unit ID No., and description (i.e., Hit Promotional Products, Inc., 1030313, EU 001, Printing and Manufacturing Operations);
- b. total quantity (gallons) of each VOC-containing material (e.g., inks, coatings, thinners, solvents, etc.) used for the month;
- c. VOC content (lbs/gallon) of each VOC-containing material (e.g., inks, coatings, thinners, solvents, etc.) used for the month;
- d. calculated monthly total (tons/month) VOC emissions (based upon b. and c. above); and
- e. cumulative total of the VOC emissions for the most recent 12 consecutive month period (tons per 12 consecutive month period).

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030313-006-AC]

A.10. HAP Recordkeeping: In order to document compliance with the HAP emission limitations of Specific Condition No. A.2., the permittee shall maintain monthly HAP records which shall contain, at a minimum, the following:

- a. facility name, facility ID No., emission unit ID No., and description (i.e., Hit Promotional Products, Inc., 1030313, EU 001, Printing and Manufacturing Operations);
- b. total quantity (gallons) of each HAP containing material (i.e., inks, coatings, thinners, solvents, etc.) used for the month;
- c. HAP content (lbs/gallon) of each HAP-containing material (i.e., inks, coatings, thinners, solvents, etc.) used for the month;
- d. calculated monthly total (tons/month) HAP emissions for each individual HAP and for total HAPs (based upon b. and c. above); and

### SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030313-006-AC]

- A.11. Daily Recordkeeping: If any month results in individual HAP emissions exceeding 80% of the major source threshold (i.e., 8.0 tons of any individual HAP) for the most recent 12 consecutive month period, the facility shall keep daily records beginning on the next operational day following when the monthly calculation was completed. These records shall be added daily to the most recent eleven (11) calendar month's emissions totals. When one month of daily records is completed, the facility shall make a determination if daily recordkeeping must be continued. If individual HAP emissions continue to exceed 80% of the individual HAP major source threshold, then daily record keeping shall continue. If individual HAP emissions do not exceed 80% of the HAP major source threshold, then the facility may return to monthly recordkeeping. The daily records shall include cumulative 12-month emission totals to demonstrate compliance with the emission limitations of Specific Condition No. A.2. The use of purchases as a proxy for usage is not allowed for the monthly and daily recordkeeping.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030313-006-AC]

- A.12. Documentation: Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition Nos. A.9., A.10., and A.11. which include sufficient information to determine VOC and HAP emissions, shall also be kept. Based on the VOC and/or HAP emission limitations, "quantity purchased" may not be used to satisfy the requirement of "quantity used".

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

- A.13. Records Completion and Retention: The monthly records required by Specific Condition Nos. A.9. and A.10. shall be completed by the 10<sup>th</sup> day of the following month. Daily records, if required by Specific Condition No. A.11. shall be completed within three (3) business days. The records shall be maintained in a form suitable for inspection by the Department and/or PCDEM upon request and shall be retained at the facility for at least a three (3) year period.

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

- A.14. Reporting Equipment Changes: The facility shall submit an updated equipment list (Appendix E) to the Department and to the Pinellas County Department of Environmental Management (PCDEM) once a year by January 30<sup>th</sup>. Any printing operation equipment changes that would result in an increase in actual emissions could be considered a modification and may require an air construction permit prior to installation.

*(Permitting Note: Addition of equipment that would be subject to any unit specific applicable requirement (e.g. equipment meeting VOC RACT requirements in accordance with Rule 62-296.500, F.A.C.) would trigger the need for a construction permit prior to installation.)*

[Rules 62-4.070(3), 62-210.200 ("Modification"), 62-210.300 (Permits Required), and 62-210.300(3)(b)1., F.A.C.; Construction Permit 1030313-006-AC]