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

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

Authorized Representative:
Gary D. Meadows, CFO

Air Permit No. 1030313-015-AC
Permit Expires: 10/31/2017
Minor Air Construction Permit

Construction of Fifth Printing Operation

PROJECT

This is the final air construction permit, which authorizes the addition of fifth screen printing operation. The proposed work will be conducted at the Hit Promotional Products, Inc. facility (Standard Industrial Classification No. 3993), which is a screen printing operation categorized under Standard Industrial Classification No. 3993. After the completion of this project, the Hit Promotional Products, Inc. facility will include a total of five printing operation locations. The primary printing operation is located in Pinellas County at 7150 Bryan Dairy Road in Largo, Florida. The new (fifth) screen printing operation will be located in Pinellas County at 8155 Bryan Dairy Road in Largo, Florida. The UTM coordinates for the five locations are as follows:

(1) 7150 Bryan Dairy Road - Zone 17, 328.9 km East, and 3083.9 km North,

(2) 8226 118th Avenue North - Zone 17, 327.4 km East, and 3085.0 km North,

(3) 3320 122nd Avenue - Zone 17, 334.9 km East, and 3085.3 km North, and

(4) 7975 114th Avenue, Suite 100 - Zone 17, 324.5 km East, and 3084.7 km North.

(5) 8155 Bryan Dairy Road – Zone 17, 327.6 km East, and 3084.3 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.

STATEMENT OF BASIS

This air pollution construction 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (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.

Executed in Hillsborough County, Florida

for

Pamala Vazquez
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.

Gary D. Meadows, Hit Promotional Products, Inc., gmeadows@hitpromo.net

Jake Gaines, Hit Promotional Products, Inc., jgaines@hitpromo.net

Robert E. Wallace, III, P.E., Environmental Engineering Consultants, Inc., rwallace@eec-tampabay.com

Marvin Scott, Environmental Engineering Consultants, Inc., mscott@eec-tampabay.com

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 November 7, 2016
(Clerk) (Date)

FACILITY DESCRIPTION

This facility consists of four printing operations (emissions units) each located at one of four different sites in Pinellas County, Florida. Emissions Unit (E.U.) No. 001 is the primary printing operation located at 7150 Bryan Dairy Road in Largo. E.U. No. 002 is the printing operation located at 8226 118th Avenue North in Largo and is approximately one mile from E.U. 001. E.U. No. 003 is the printing operation located at 3320 122nd Avenue North in St. Petersburg and is approximately four miles from E.U. No. 001. E.U. No. 005 is the printing operation located at 7975 114th Avenue, Suite 100 and is approximately one mile from E.U. No. 001. The facility also includes one unregulated backup emergency generator (E.U. No. 004) which is used at the 7150 Bryan Dairy Road location.

The printing operation prints company names, logos, customized messages, etc. on pens, foam pads, cups, water bottles, key chains and other miscellaneous products. Printing is accomplished by various methods including pad printing, screen printing, hot stamping, UV cured inks, and ceramic printing and digital UV printing.

Inks and cleanup solvents used in the operation of the printing presses may contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs) which are emitted fugitively. Printing on some items such as plastic and stainless drink ware, water bottles, and other promotional items will be printed with UV ink which does not contain VOC.

This facility is classified as a Title V major source of the air pollutant VOC and is a synthetic minor source of HAPs. The existing facility consists of the following emissions units.

Facility ID No. 1030313

ID No.	Emission Unit Description
001	Printing Operation (7150 Bryan Dairy Road in Largo)
002	Printing Operation (118th Avenue in Largo)
003	Printing Operation (122nd Avenue in St. Petersburg)
004	Backup Emergency Generator (unregulated emissions unit)
005	Printing Operation (7975 114th Avenue, Suite 100 in Largo)

PROPOSED PROJECT

This project will add a new printing operation at 8155 Bryan Dairy Road in Largo (EU 006). Equipment from the existing printing operation located at 7975 114th Avenue in Largo (EU 005) will be relocated to the new printing operation and some new equipment will be also purchased.

The existing printing operation located at 7975 114th Avenue in Largo (EU 005) will be utilized for production and warehouse storage. Some new equipment that will be similar to what was already owned and some production related equipment from other production locations will be moved to EU 005.

The goal of this project is to provide more room to operate, create more storage and streamline production. This project does not increase the VOC emissions limit.

This project will add and modify the following emissions units.

Facility ID No. 1030313	
ID No.	**Emission Unit Description**
005	Printing Operation (7975 114th Avenue, Suite 100 in Largo)
006	Printing Operation (8155 Bryan Dairy Road in Largo)

EXEMPT EMISSION SOURCES/ACTIVITIES

The following emissions units and/or activities are exempt from permitting pursuant to Rule 62-210.300(3)(a), F.A.C.

- Soldering and equipment repair operations. [Rule 62-210.300(3)(a)13., F.A.C.]
- One LEHR natural gas fired ovens for setting ceramic inks (10 million standard cubic feet of natural gas/year usage combined). [Rule 62-210.300(3)(a)34., F.A.C.]
- Two M&R 72” Gas Dryers for Drying print apparel (330,000 BTU/hour). [Rule 62-210.300(3)(a)34., F.A.C.]

The following emissions units and/or activities are exempt from permitting pursuant to Rule 62-210.300(3)(b), F.A.C.

- Manually operated tools (including but not limited to battery powered, electrically powered or pneumatically powered) 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.
- Hot stamping operations where no solvent based products are used.
- Miscellaneous propane use and forklift operations.
- Acetone usage.
- UV ink printing.
- Electric forklift
- Bailing waste packaging materials for recycling
- Digital label printing
- Laser Engraving
- Digital UV Printing

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 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(PSD), F.A.C.
- This facility is a synthetic non-PSD source for the pollutant volatile organic compounds (VOC).

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit No. 1030313-012-AC and was concurrently processed with Title V Permit No. 1030313-013-AV.

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 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

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);
   - Appendix D (Common Testing Requirements); and
   - 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: The permittee shall notify the Compliance Authority upon commencement of construction. 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. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires.
[Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Application for Title V Air Operation Permit: This construction permit is being processed concurrently with a Title V revision application (1050158-009-AV), which incorporates the changes made in this construction permit.
[Rule 62-213.405, F.A.C.]

9. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{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.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FACILITY-WIDE REQUIREMENTS

10. 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 Air Quality Division (PCAQD) receives a valid odor complaint, the Department and/or PCAQD 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]

11. 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:
    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.]

12. 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.]

13. Unconfined Particulate Matter Opacity: As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. 12. 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.7. may be necessary.
[Rule 62-4.070(3), F.A.C.]

A. EU Nos. 001, 002, 004, 005 & 006 – Printing Operations

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
001, 002, 004, 005 & 006	Printing Operations: – E.U. No. 001 consists of the printing operations located at 7150 Bryan Dairy Road in Largo, Florida. – E.U. No. 002 consists of the printing operations located at 8226 118th Avenue North in Largo, Florida. – E.U. No. 003 consists of the printing operations located at 3320 122nd Avenue North in St. Petersburg, Florida. – E.U. No. 005 consists of the printing operations located at 7975 114th Avenue, Suite 100 in Largo, Florida. – E.U. No. 006 consists of the printing operations located at 8155 Bryan Dairy Road in Largo, Florida *(new location)* These emissions units include activities such as printing, screening, gluing and cleaning. The inks and cleanup solvents used in the operation of the printing presses may contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs). VOC and HAPs are emitted fugitively from various points throughout the facility (doors, windows, ventilation system, etc.). *Note: A summary of the existing and proposed equipment for each site is included in Section 4. Appendix E – Equipment List.*

EQUIPMENT

A.1. New Printing Operation (EU 006): The permittee is authorized to add a new printing operation to be located at 8155 Bryan Dairy Road in Largo, Florida.
[Application No. 1030313-015-AC]

PERFORMANCE RESTRICTIONS

A.2. Restricted 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.3. Emissions Standards:

a. VOC Emissions Standard (Multi-Unit) - The maximum VOC emissions from E.U. Nos. 001, 002, 003, 005 and 006 combined shall not exceed 239 tons per any consecutive 12-month period.
[Application No. 1030313-015-AC/016-AV and Rule 62-210.200(PTE), F.A.C.]

b. Individual and Total HAP Emissions Standards (Multi-Unit) - The maximum HAP emissions from E.U. Nos. 001, 002, 003, 005 and 006 combined shall not exceed the following:

1) Total HAPs shall not exceed 23.5 tons per any consecutive 12-month period.

2) Any Individual HAP shall not exceed 9.4 tons per any consecutive 12-month period.

[Application No. 1030313-015-AC/016-AV and Rule 62-210.200(PTE), F.A.C.]

{Permitting note: Because of the limits specified above, this facility is not a major source of Total HAPs or Individual HAP.}

A.4. Emissions Calculations - In order to document compliance with Specific Condition No. A.3., the permittee shall calculate VOC and HAP emissions based on the following equation:

Emissions (in tons) = Usage x (VOC or HAP Content) /2000

Where:
Usage = gallons of material used.
VOC or HAP Content = pounds of VOC or HAP per gallon of material.

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

NOTIFICATION REQUIREMENTS

A.5. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 006 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDS AND REPORTS

A.6. VOC Recordkeeping: In order to document compliance with the VOC emission limitations of Specific Condition No. A.3.a., the permittee shall maintain monthly VOC records for each emissions unit. The records shall contain, at a minimum, the following:

a. The facility name, facility ID No., and E.U. Nos. (i.e., Hit Promotional Products, Inc., 1030313, E.U. Nos. 001, 002, 003, 005 & 006).

b. For each emissions unit (E.U. Nos. 001, 002, 003, 005 & 006) include the following information:

1) total quantity (gallons) of each VOC-containing material (e.g., inks, coatings, thinners, solvents, etc.) used for the month;

2) VOC content (lbs/gallon) of each VOC-containing material (e.g., inks, coatings, thinners, solvents, etc.) used for the month for each emissions unit;

3) The total (calculated) VOC emissions (in tons) for the month.

c. For E.U. Nos. 001, 002, 003, 005 and 006) combined, include the total (calculated) VOC emissions (in tons) for the most recent 12 consecutive month period.

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

A.7. HAP Recordkeeping: In order to document compliance with the HAP emission limitations of Specific Condition No. A.3.b., the permittee shall maintain monthly HAP records for each emissions unit, which shall contain, at a minimum, the following:

a. The facility name, facility ID No., and emission unit ID No. (i.e., Hit Promotional Products, Inc., 1030313, EU Nos. 001, 002, 003, 005 & 006).

b. For each emissions unit (E.U. Nos. 001, 002, 003, 005 & 006) include the following information:

1) total quantity (gallons) of each HAP containing material (i.e., inks, coatings, thinners, solvents, etc.) used for the month;

2) the Individual HAP and Total HAPs content (lbs/gallon) of each HAP-containing material (i.e., inks, coatings, thinners, solvents, etc.) used for the month;

3) the total (calculated) emissions (in tons) for each Individual HAP and for the Total HAPs for the month.

c. For E.U. Nos. 001, 002, 003, 005 and 006 combined, include the (calculated) emissions (in tons) for each Individual HAP for the most recent 12 consecutive month period.

d. For E.U. Nos. 001, 002, 003, 005 and 006 combined, include the (calculated) emissions (in tons) for the Total HAPs for the most recent 12 consecutive month period.

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

A.8. Documentation: Supporting documentation (e.g., MSDS or SDS, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for monthly records, which includes sufficient information to determine VOC and HAP emissions, shall also be maintained. The use of purchases as a proxy for usage is not allowed for the monthly recordkeeping.
[Rule 62-4.070(3), F.A.C.]

A.9. Records Completion and Retention - All monthly records shall be completed by the 10th day of the following month. The records shall be maintained in a form suitable for inspection by the Department and/or PCAQD upon request and shall be retained at the facility for at least a five (5) year period.
[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]

A.10. Reporting Equipment Changes - The permittee shall submit an updated equipment list (Appendix E) for each emissions unit to the Department and to the PCAQD once a year by January 30th for the previous year if equipment was added to the facility. 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.
[Rules 62-4.070(3), 62-210.200 ("Modification"), 62-210.300 (Permits Required), and 62-210.300(3)(b)1., F.A.C.]

{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.}