Title V Air Operation Permit Renewal
Permit No. 0310535-018-AV

APPLICANT

The applicant for this project is Johnson & Johnson, Vision Care, Inc. The applicant's responsible official and mailing address are: Ms. Paula Shepherd, Plant Manager, J & J Vision Care, 7500 Centurion Parkway, Jacksonville, Florida 32256.

FACILITY DESCRIPTION

The applicant operates the existing J & J Vision Care, which is located in Duval County at 7500 Centurion Parkway, Jacksonville, Florida.

The applicant applied on February 2, 2018 to the Department for a Title V air operation permit renewal. Potential To Emit (PTE) emissions of Volatile Organic Compounds (VOC) are greater than or equal to 100 TPY. The facility has a permitted VOC emissions cap that is less than 250 TPY. This makes the facility a Title V major source and not a PSD major source. Hazardous Air Pollutants (HAPs) emissions are less than 10 TPY for each individual HAP and less than 25 TPY for all HAPs combined, which makes the facility an area source of HAPs. Facility regulated emissions units consist of the Contact Lens manufacturing line, a diesel fire pump and two emergency diesel engines with generators.

The largest facility source of PTE VOC emissions is from the Contact Lens manufacturing line. The facility operates two thermal oxidizers (TOs) to control VOC emissions from the Contact Lens Manufacturing Type A lines. TO #1 controls VOC emissions from Type A lines 18, 19, and 20. TO #2 controls VOC emissions from Type A lines 1, 2, 3, 7, 8, and 22. The facility uses two dust collectors to control particulate matter emissions from the Contact Lens manufacturing waste plastic and packaging systems.

This renewal made the following changes. It incorporates the terms of Air Construction Permit No. 0310535-017-AC for the installation of contact lens manufacturing lines and a second oxidizer. Compliance Assurance Monitoring (CAM) requirements appear for TO #1 and TO #2 and a Compliance Plan is in place toward meeting the CAM requirements. Air construction permit 0310535-017-AC for the Contact Lens manufacturing line expansion contained Specific Conditions that are expanded upon to accommodate the operation of two TOs with different VOC destruction efficiencies. This renewal identifies the Type A lines controlled by each TO and the VOC and particulate control devices that operate in the Contact Lens manufacturing line. Recordkeeping and reporting requirements were expanded upon to track and report compliance with the VOC emissions cap with the operation of two TOs (with different VOC destruction efficiencies) with bypass.

This facility also includes miscellaneous insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Contact Lens Manufacturing
002	Diesel Fire Pump – Model Year 1994, 208 HP
003	Emergency Diesel Generator – Model Year 2012, 2922 HP
004	Emergency Diesel Generator – Model Year 2003, 535 HP

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on February 2, 2018, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 60, Subpart A, NSPS General Provisions	003
40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	003
40 CFR 63, Subpart A, NESHAP General Provisions	002, 004
40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	002, 003, 004
40 CFR 64, Compliance Assurance Monitoring	001
State Rule Citations	
State Rule Citations (Rule 62-204.800, F.A.C., Federal Regulations adopted by Reference)	001, 002, 003, 004
State Rule Citations (Rule 62-210.200, F.A.C., PTE)	001
State Rule Citations (Rule 62-213, F.A.C., Operation Permits for Major Sources of Air Pollution)	001, 002, 003, 004
State Rule Citations (Rule 62-296, F.A.C., Stationary Sources – Emission Standards)	001
State Rule Citations (Rule 62-297, F.A.C., Stationary Sources – Emissions Monitoring)	001

This facility also includes miscellaneous insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received February 2, 2018.
Additional Information Request dated February 6, 2018.
Additional Information Request extended to July 6, 2018.
Additional Information Request extended to July 16, 2018.
Additional Information Response received July 13, 2018.

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3851 – Ophthalmic Goods.

North American Industry Classification System (NAICS): 339115 – Ophthalmic Goods Manufacturing.

HAP: The facility **is not** identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) applies to emissions unit 001 for the controlled emissions of Volatile Organic Compounds (VOCs).

PROJECT REVIEW

The changes that were made as part of this renewal include incorporating the terms of Air Construction Permit No. 0310535-017-AC for the installation of contact lens manufacturing lines and a second oxidizer. Compliance

Assurance Monitoring (CAM) requirements appear for TO #1 and TO #2 and a Compliance Plan is in place toward meeting the CAM requirements. Air construction permit 0310535-017-AC for the Contact Lens manufacturing line expansion contained Specific Conditions that are expanded upon to accommodate the operation of two TOs with different VOC destruction efficiencies. This renewal identifies the Type A lines controlled by each TO and the VOC and particulate control devices that operate in the Contact Lens manufacturing line. Recordkeeping and reporting requirements were expanded upon to track and report compliance with the VOC emissions cap with the operation of two TOs (with different VOC destruction efficiencies) with bypass.

CONCLUSION

This project renews Title V air operation permit No. 0310535-012-AV, which was effective on September 17, 2013. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.