

Hit Promotional Products, Inc.

Facility ID No. 1030313

Pinellas County

Title V Air Operation Permit Revision

Permit No. 1030313-021-AV

(Revision of Title V Air Operation Permit No. 1030313-019-AV)



Permitting Authority:

State of Florida

Department of Environmental Protection

Air and Solid Waste Permitting, Southwest District

13051 North Telecom Parkway, Suite 101

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Title V Air Operation Permit Revision

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FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Alexis A. Lambert
Secretary

Southwest District
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

PERMITTEE:

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

Permit No. 1030313-021-AV
Facility ID No. 1030313
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility. The existing facility includes five printing operations. The primary printing operation is located in Pinellas County at 7150 Bryan Dairy Road in Largo, Florida. The UTM coordinates for the seven 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,
- (4) 7975 114th Avenue, Suite 100 – Zone 17, 324.5 km East, and 3084.7 km North,
- (5) 8285 Bryan Dairy Road – Zone 17, 327.3 km East, and 3084.3 km North,
- (6) 8155 Bryan Dairy Road – Zone 17, 327.6 km East, and 3084.3 km North, and
- (7) 8275 114th Avenue North – Zone 17, 327.4 km East and 3084.7 km North.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

1030313-019-AV Effective Date: October 26, 2022

1030313-021-AV Effective Date: **DATE, 20yy**

Renewal Application Due Date: March 15, 2027

Expiration Date: October 26, 2027

(Proposed)

(Signature)

Melissa Madden
Environmental Manager
Permitting & Waste Cleanup Program
Southwest District

MM/es/admin

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility consists of five printing operations (emissions units) each located at one of five different sites in Pinellas County, Florida. The five printing operations are listed below:

1. Emissions Unit (E.U.) No. 001 is the primary printing operation located at 7150 Bryan Dairy Road in Largo.
2. 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.
3. 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.
4. 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.
5. E.U. No. 006 is the printing operation located at 8285 Bryan Dairy Road and is approximately one mile from E.U. No. 001.
6. E.U. No. 007 is the printing operation located at 8155 Bryan Dairy Road and is approximately one mile from E.U. No. 001.
7. E.U. No. 008 is the printing operation located at 8275 114th Avenue North 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, 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.

Subsection B. Summary of Emissions Units.

| EU No. | Brief Description |
|--|---|
| <i>Regulated Emissions Units</i> | |
| 001 | Printing Operation (7150 Bryan Dairy Road in Largo) |
| 002 | Printing Operation (118th Avenue in Largo) |
| 003 | Printing Operation (122nd Avenue in St. Petersburg) |
| 005 | Printing Operation (7975 114th Avenue, Suite 100 in Largo) |
| 006 | Printing Operation (8285 Bryan Dairy Road in Largo) |
| <u>007</u> | <u>Printing and Manufacturing Operations (8155 Bryan Dairy Road in Largo)</u> |
| <u>008</u> | <u>Printing and Manufacturing Operations (8275 114th Avenue North in Largo)</u> |
| <i>Unregulated Emissions Units and Activities</i> (see Appendix U, List of Unregulated Emissions Units and/or Activities) | |
| 004 | Backup Emergency Generator (unregulated emissions unit) |

SECTION I. FACILITY INFORMATION.

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision application received January 21, 2025, 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). |
|--|---------------|
| <i>State Rule Citations</i> | |
| 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards | Facility-wide |

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means 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) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to 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. 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), F.A.C.]

FW4. General 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 equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. 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.]

FW6. Unconfined Particulate Matter Opacity. As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. FW5. 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. FW5. may be necessary. [Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030313-015-AC]

Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW7. 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

SECTION II. FACILITY-WIDE CONDITIONS.

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.}

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. (See also Appendix RR, Conditions RR1 and RR7.) [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Attn: Air Enforcement Branch

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: <http://www2.epa.gov/rmp>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
- b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

SECTION II. FACILITY-WIDE CONDITIONS.

FW10. Semi-Annual Reports. The permittee shall monitor compliance with the terms and conditions of this permit and shall submit reports at least every six months to the compliance office. Each semi-annual report shall cover the 6-month periods of January 1 – June 30 and July 1 – December 31. The reports shall be submitted by the 60th day following the end of each calendar half (i.e., March 1st and August 29th of every year). All instances of deviations from permit requirements (including conditions in the referenced Appendices) must be clearly identified in such reports, including reference to the specific requirement and the duration of such deviation. If there are no deviations during the reporting period, the report shall so indicate. Any semi-annual reporting requirements contained in applicable federal NSPS or NESHAP requirements may be submitted as part of this report. The submittal dates specified above shall replace the submittal dates specified in the federal rules. All additional reports submitted as part of this report should be clearly identified according to the specific federal requirement. All reports shall include a certification by a responsible official, pursuant to subsection 62-213.420(4), F.A.C. (See also Conditions RR2. – RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.) [Rule 62-213.440(1)(b)3.a., F.A.C.; and, 40 CFR 60.19(d), 40 CFR 61.10(h) & 40 CFR 63.10(a)(5)]

{Permitting Note: EPA has clarified that, pursuant to 40 CFR 70.6(a)(3), the word “monitoring” is used in a broad sense and means monitoring (i.e., paying attention to) the compliance of the source with all emissions limitations, standards, and work practices specified in the permit.}

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001, 002, 003, 005, & 006, 007 & 008

The specific conditions in this section apply to the following emissions units:

| EU 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) |
| 005 | Printing Operation (7975 114th Avenue, Suite 100 in Largo) |
| 006 | Printing Operation (8285 Bryan Dairy Road in Largo) |
| 007 | Printing and Manufacturing Operations (8155 Bryan Dairy Road in Largo) |
| 008 | Printing and Manufacturing Operations (8275 114th Avenue North in Largo) |

EU Nos. 001, 002, 003, 005, and 006, 007, and 008 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.).

The printing operation on Bryan Dairy Road also includes a backup emergency spark ignition engine. It is a Cummins 60kW generator and is an unregulated emissions unit.

{Permitting Note: An equipment list that represents the facility at the time Title V renewal application No. 1030313-019-AV was received is included in the Referenced Attachments Section (Equipment List). This list has been included for information purposes only.}

{Permitting Note: These emission units are regulated under Rule 62-296.320 (General Pollutant Emission Limiting Standards), F.A.C.}

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. These emissions units may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.; and, Permit No. 1030313-015020-AC]

Emission Limitations and Standards

A.2. VOC Emissions (Multi-Unit): Volatile Organic Compound (VOC) emissions from E.U. Nos. 001, 002, 003, 005, and 006, 007 and 008 combined shall not exceed 239 tons per any consecutive 12-month period. [Rule 62-210.200(PTE), F.A.C. and Application No. 1030313-015020-AC]

A.3. Individual and Total HAP Emissions (Multi-Unit): The maximum HAP emissions from E.U. Nos. 001, 002, 003, 005, and 006, 007 and 008 combined shall not exceed the following:

- Total HAPs shall not exceed 23.5 tons per any consecutive 12-month period.
- Any Individual HAP shall not exceed 9.4 tons per any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C. and Application No. 1030313-015020-AC]

{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. To document compliance with Specific Condition No. A.2. and A.3., the permittee shall calculate VOC and HAP emissions based on the following equation:

$$\text{Emissions (in tons)} = \text{Usage} \times (\text{VOC or HAP Content}) / 2000$$

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. and Construction Permit No. 1030313-015020-AC]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001, 002, 003, 005, & 006, 007 & 008

Recordkeeping and Reporting Requirements

A.5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

A.6. VOC Recordkeeping: To document compliance with the VOC emission limitations of Specific Condition No. A.2., 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, 007 & 008).
- b. For each emissions unit (E.U. Nos. 001, 002, 003, 005 & 006, 007 & 008) 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 & 006, 007 & 008 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. and Construction Permit No. 1030313-015020-AC]

A.7. HAP Recordkeeping: To document compliance with the HAP emission limitations of Specific Condition No. A.3., 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, 007 & 008).
- b. For each emissions unit (E.U. Nos. 001, 002, 003, 005 & 006, 007 & 008) 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, 007 and 008 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, 007 and 008 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. and Construction Permit No. 1030313-015020-AC]

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. and Construction Permit No. 1030313-015020-AC]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001, 002, 003, 005, & 006, 007 & 008

- 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 (see Equipment List Attachment included in the “Referenced Attachments”) 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. and Construction Permit No. 1030313-015020-AC]

{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.}