TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

TSE Industries, Inc.
5260 113th Avenue North
Clearwater, FL 33670

Facility ID No. 1030207

PROJECT

Project No. 1030207-009-AC

Application for Minor Air Construction Permit
Project Name: After-the-Fact Construction Permit for TDI Dimer Batch Reactor System

COUNTY

Pinellas, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

January 5, 2012

Prepared by Cindy Zhang-Torres

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:
Richard K. Klingel, President
TSE Industries, Inc.
5260 113th Avenue North
Clearwater, FL 33670

B. Professional Engineer:
Cory A. Houchin, P.E., Project Manager
Environmental Sciences Group, Inc.
P.O. Box 7495
Tampa, FL 33673

C. Project Location:
5260 113th Avenue North
Clearwater, FL 33670

D. Project Summary:
This is an after-the-fact construction permit for the modification of a Toluene Diisocyanate (TDI) Dimer batch reactor system for the purposes of safety and efficiency. Many of the existing vessels were downsized. The distillation unit was placed in-line with the production process instead of using a mobile subcontracted unit. The reactor process is the same.

E. Application Information:

Application Received on:	March 09, 2011
Additional Information Requested on:	March 18, 2011
Additional Information Received on:	December 22, 2011, December 23, 2011 and January 9, 2012
Application Complete:	January 9, 2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility could be a source of particulate emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Facility is a source of VOCs, could also be a source of odor.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	There is no applicable source category.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources	N	There is no applicable source category.

Subject to:	Y/N	Comments
(NSPS)		
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Compliance testing is not required for this project.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tons per consecutive 12 month period)	Allowable Emissions (tons per consecutive 12 month period)
VOC	EU 002 & 003 combined	29.75	29.75
Total HAP	EU 002 & 003 combined	24.5	24.5
Any Individual HAP	EU 002 & 003 combined	9.9	9.9
VE	Facility Wide		Less than 20%

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application,

reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).