TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

The Euclid Chemical Company
1611 Gunn Highway
Odessa, Florida 33556-5311

Facility ID No. 1010509

PROJECT

Project No. 1010509-004-AC
Application for Minor Air Construction Permit
Project Name: Install Dust Collection System / Reassign EUs

COUNTY

Pasco, Florida

PERMITTING AUTHORITY

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

March 7, 2013

Prepared by Danny Stubbs

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. Facility Description:

The facility is a decorative concrete systems product manufacturing facility. The facility consists of three buildings with street addresses at 1611/1725/1733 Gunn Highway and manufactures decorative concrete systems that economically recreate the look of natural stone, wood, tile, brick, and pavers. The facility produces the following types of liquid and dry products packaged in retail and commercial quantities:

- Concrete Stains (water-based)
- Chemical Stains (water-based)
- Sealants
- Color Hardeners
- Color Releasers
- Retardants
- Grouts
- Admixtures
- Epoxy Coatings
- High Gloss Wax

The facility also makes molds called "stamps" or "liners" and texturing tools used with their products to create desired architectural textures and patterns.

Production operations conducted at the facility include receiving/storing raw materials, mechanical mixing of liquid organic and inorganic products, mechanical blending of dry inorganic products, packaging and labeling of liquid and dry products, producing texture molds (i.e., stamps and liners), preparing product samples, assembling proprietary mechanical mixing systems, and warehousing of finished products.

II. Project Description:

A. Applicant:

Mr. Ken DeRocker, Vice President and General Manager
The Euclid Chemical Company
1611 Gunn Highway
Odessa, Florida 33556-5311

B. Professional Engineer:

Mr. Joseph L. Tessitore, P.E.
Ecology and Environment, Inc.
801 W. State Rd. 436, Ste 2011
Altamont Springs, Florida 32714

C. Project Location:

The facility is located at 1611 Gunn Highway Odessa, Florida

D. Project Summary:

This project will add a new emissions unit (EU No. 009) that will include six manually loaded mixers, eight filling stations, and three high speed dispensers which will all vent to new common baghouse. With the exception of the common baghouse, all of the equipment associated with this emissions unit is existing equipment and all of the equipment is located inside the production building. Emissions from mixing and packaging equipments in the production building that previously discharged into the building will be captured by the new common baghouse.

This project will also redefine the existing emissions units as follows:

- EU Nos. 002, 003, 004 and 005 (in Permit No. 1010509-003-AC) will be redefined as one combined emissions unit (i.e. EU No. 002). All equipment associated with the redefined EU No. 002 unit currently vents to a common baghouse manufactured by Dover/MEI Modern Equipment, Inc.
- EU Nos. 007 and 008 (in Permit No. 1010509-003-AC) will be redefined as one combined emissions unit (i.e. EU No. 007). All equipment associated with the redefined EU No. 007 unit currently vents to a common baghouse manufactured by Torit.

In addition to redefining the emissions units, several specific conditions were associates with the redefined emissions unit were also revised. The revisions are summarized below.

- The transfer rate limit of 4,500 lbs per batch period which was specific for the weigh hopper, the three receiving bins and the three mixers (which were previously defined as EU Nos. 006, 007 and 008, respectively in Permit No. 1010509-003-AC) was removed. Potential emissions calculations for the weigh hopper, three receiving bins and three mixers were based on their annual throughputs. The permit contains annual throughputs limits on cement and sand silos which will limit the annual throughputs of the weigh hopper, three receiving bins and three mixers.

- Daily recordkeeping requirements for the cement silo loading, sand silo loading, and weigh hopper operation were removed. Monthly records are sufficient for potential to emit purposes.
- Testing requirements were revised to better reflect the requirements as stated in Rule 62-296.414(3), F.A.C. The requirements to operate the weigh hopper requirement at 90 to 100% of its permitted limit was removed because based on the rule language, its only requires it to operate at a normal batching rate and duration. Based on data from AP-42, Section 11.12, the emissions factor for the weigh hopper loading is very small in comparison to the emissions factor for cement silo load.

E. Application Information:

Application Received on: 2/4/2013
Application Complete: 2/4/2013

III. Applicable State and Federal Regulations

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. – Permits Required	Y	subject to 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 is a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	facility is a sources of VOC emissions.
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	Y	facility is subject to rule 62-296.414, F.A.C. – Concrete Batch Plants.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Pasco County is designated as an attainment area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a new source and therefore it is not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
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)	Y	exempt Mold Shop's flexible foam production station is subject to 40 CFR 63, Subpart OOOOOO
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a natural minor source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	for this project, VE testing is required for EU No. 009

IV. Summary of Emissions

EU No. 002 - Two Cement Silos, Two Sand Silos and Weigh Hopper with Common Baghouse
EU No. 007 - Three Receiving Bins and Three Mixers with Common Baghouse
EU No. 009 - Six Mixers, Eight Filling Stations and Three High Speed Dispensers with Common Baghouse

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
PM	002	0.16	
	007	3.6	
	009	0.03	
	Total	3.79	
PM10	002	0.104	
	007	1.04	
	009	0.009	
	Total	1.15	
VE	002		5% (opacity)
	007		5% (opacity)
	009		5% (opacity)

Note: PM/PM10 emissions listed in the table above represent the controlled emissions and are from Section 10, Attachment A-4 of the construction permit application dated 2/4/2013.

V. 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.

VI. 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).