Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

November 19, 2010

By Electronic Mail, Received Receipt Requested
dwane.brumfield@taminco.com

Mr. Robert Dwane Brumfield
Plant Manager
Taminco Methylamines, Inc.
4575 Highway 90 East
Pace, Florida 32571

Dear Mr. Brumfield:

This is to acknowledge receipt of your application for an air construction permit for the DIMLA Production project, file number 1130004-019-AC, for the Taminco Pace Facility in Santa Rosa County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. Please provide the information listed below pursuant to Rules 62-213.420(1)(b)3 and 62-4.070(1), Florida Administrative Code (F.A.C.). References made below to "Application" refer to DEP Form No. 62-210.900(1), Effective March 11, 2010 and its instructions. Evaluation of your proposed project will be delayed until all requested information has been received. If your response to any of the below items requires new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide a Facility Plot Plan as required by the Application (Part II, Facility Information, Section C, Facility Additional Information, Item 1), "showing the location of existing and proposed manufacturing processes, control equipment, stacks, vents, identifiable sources of fugitive emissions and principal buildings." The Facility Plot Plan supplied with the permit application does not show the locations of any emission points.

2. Please provide a complete Process Flow Diagram as required by the Application (Part II, Facility Information, Section C, Facility Additional Information, Item 2), "showing any proposed new or modified emission units and all existing emission units at the facility."
   a. The DIMLA Plant Process Flow Diagram does not show the flare (L-67101) or the Riley Stoker Boiler (B-24001), although the individual Part III (Emission Unit

Information) Section C, Item 1, refers to their equipment numbers being shown on the flow diagram.

b. The DIMLA Plant Storage Block Flow Diagram appears to have errors in several of the tank equipment numbers provided.
c. The proposed new formic acid tank is not shown.

3. Please provide an Area Map (Part II, Facility Information, Section C, Facility Additional Information, Additional Requirements for Air Construction Permit Applications). Please show, or indicate by way of the legend, the "location of the facility and points of air pollutant emissions in relation to residences, roads, and other features of the surrounding area."

4. For each emissions unit affected by this project, please enter the Baseline Actual Emissions and Projected Actual Emissions as required by the Application (Part III, Emission Unit Information, Section F1, Items 8 and 9), including "the 24-month baseline period used to establish baseline actual emissions." For preliminary purposes, we have listed the affected emissions units as follows:

ID No.	Emission Unit Description
EU001	Riley Stoker Boiler
EU005	Amines Plants Flare
EU062	Facility-Wide Fugitives
EU063	Cooling Towers (4)
EU076	DIMLA Product and Residue Storage Tanks (includes loading)
EU075	Wastewater Treatment Plant Fugitives
EU065	Storage Tanks (add non regulated storage tanks, including formic acid)
EU058	Higher Amines/72"Column/DIMLA MON Group 2 Storage Tanks
EU071	Higher Amines/DIMLA MON Maintenance Wastewater
EU072	Higher Amines/DIMLA MON Wastewater
EU074	Site-Wide MON Heat Exchangers

Please let us know if you foresee a problem grouping the new DIMLA emissions units with the existing emissions units as shown. If not, please use these emissions unit numbers and descriptions when submitting corrected Section F1, Items 8 and 9 for each emissions unit.

5. Please enter the discharge type code as required by the Application (Part III, Emission Unit Information, Section C.1, Emission Point Type Code) for EU001.

6. The permit application proposes to limit the amount of DIMLA purification residue fed to EU001 (B-24001) in order to avoid exceeding the 40 TPY significant emission increase for NOx. However, in Part III, Section D, Segment (Process/Fuel) Information for EU001, Segment 4 of 5, the three potential types of liquid process waste are lumped together. In order to effect the requested limit on the feed rate of DIMLA purification

residue, it should be submitted as a separate segment with the requested Maximum Annual Rate and the reason for the limit described in the segment comment. [Rule 62-212.400(2)(a), F.A.C.]

7. Please enter the maximum hourly rate and the maximum percent sulfur for EU001 as required by the Application (Part III, Section D, Segment (Process/Fuel) Information, Segment 5 of 5) for EU001.

8. In the Project Description and Regulatory Analysis, regarding the applicability of NSPS Subpart Db to EU001, the definition of "modification" is cited ("any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification…."). The analysis then goes on to indicate that the physical changes to the boiler do not constitute a modification, because they fall in the category of an increase in production rate that doesn't require a "capital expenditure" [40 CFR 60.14(e)(2)]. However, there is no request for an increase in production rate, only the substitution of a fuel that produces more NOx emissions than the current method of operation. Please clarify how the change in the method of operation that is requested (use of an alternative fuel which the boiler is not currently designed to accommodate [40 CFR 60.14(e)(4)] does not constitute a "modification" under 40 CFR 60.

9. In Table 1 of the supplemental Information for this construction permit application, PSD Applicability for the Taminco Pace DIMLA Project, projected emissions that result from the incremental steam increase required to support the new process are provided for the Riley Stoker Boiler, the B&W Boiler and Cogen Units. Since the Cogen Units are not active Taminco emissions units, please explain how and by whom the post project annual monitoring required in Rule 62-212.300(1)(e), F.A.C., will be conducted and reported.

10. For EU001, in the Application Part III, Section F1, Emissions Unit Pollutant Detail Information, for NOx, Item 4 (Synthetically Limited) is checked "no." However, the emission calculation details indicate that NOx emissions are synthetically limited to below 40 TPY by limiting the amount of DIMLA Purification Residue fed to 37, 500 lb/yr. Please clarify the synthetic limitation on DIMLA Purification Residue fed and state such in the comment section.

11. For emissions unit EU063, there appears to be a typographical error in the methanol emissions listed in the Application Section F1 (1.009 TPY versus 1.099 TPY) compared to the emission calculation spreadsheet. Also, for this emissions unit, the total potential to emit doesn't seem to include the small increment added by this project as it does with the other emissions units.

12. For Wastewater Treatment Plant Fugitives (no emissions unit number provided, but referred to as EU075 in confidential emission calculations) in the Application Section B, Emissions Unit Capacity Information, Item 1, the Maximum Process or Throughput rate

is listed as 122411 MMGal/yr, but in Section D, Segment (Process/Fuel) Information, Item 5, the capacity is given as 122411 with SCC units of 1000 Gallons Wastewater Throughput. Please clarify the true capacity for this emissions unit.

13. Please clarify if the new DIMLA Group 2 Storage Tank is regulated under the HON or the MON. It appears that there may be a typographical error in the Application Section III for that emissions unit. No emissions unit number was provided; however, as proposed above, it can be added to EU058 if you are agreeable. Also, please clarify whether TK-62097 will be used for formalin and/or formic acid or whether an additional new storage tank for formic acid will be installed. If so, be sure the emissions from the formic acid tank are included with EU065.

14. In the confidential emission calculation spreadsheet (worksheet titled "Retired EU"), you indicate that the emissions units permitted in 1130004-017-AC will be retired when this project is permitted. It will be necessary to surrender 1130004-017-AC in order to avoid exceeding the PSD 40 TPY trigger for NOx, due to the contemporaneous emissions associated with the previous permit. Please submit a separate letter to the Department formally surrendering 1130004-017-AC. [Rule 62-212.400(2)(a), F.A.C.]

The EPSAP application (number 2758-1) will be electronically returned to you shortly after your receipt of this letter. Please update the EPSAP application accordingly and resubmit. If you decide to resubmit the requested additional information in hard copy, be aware it must be appropriately certified by the Responsible Official (R.O.) and Professional Engineer (P.E.), per Rules 62-213.420 and 62-4.05(3), F.A.C.]

When referring to this project, please use the file number indicated above. The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

Thank you for providing the confidential detailed emission calculation spreadsheet. The level of detail was exceptional and made review of the application go much quicker. If you have any questions, please contact Teresa Knepper at 850/595-0670 or teresa.knepper@dep.state.fl.us.

Sincerely,

/s/

Rick Bradburn
Air Program Administrator

RB/tk/c

c: Robert Lunardini, P.E.; URS Corporation: bob_lunardini@urscorp.com