

STATEMENT OF BASIS

TSE Industries, Inc.
Facility ID No.: 1030207
Pinellas County

Initial Title V Air Operation Permit **FINAL Permit No.: 1030207-004-AV**

This 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 perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

TSE manufactures, mills, stamps, and molds urethane rubber and plastic. The facility covered by this permit consists of operations at two nearby plants in Clearwater: a main material production facility located at 5260 113th Avenue North, and a secondary facility located at 4370 112 Terrace North, which typically acts as a finishing point for the overall production process of several rubber/plastic products. The operations at this secondary plant (including rubber compounding and molding, grinding and machining of hard plastic) are all insignificant air emission activities. The regulated air emission source at this facility (located at the 113th Ave. N plant) is a batch reactor system to produce toluene diisocyanate dimer (*product is called Thanacure (T9)*) that is used as an adhesion promoter for plastic and rubber products. This production system consists primarily of a 3300-gallon reactor vessel, two used-toluene storage tanks, a virgin-toluene storage tank, a toluene-diisocyanate monomer-storage tank, a centrifuge, a dryer, and associated pumps, valves, and piping.

Emissions of toluene are reduced through use of a nitrogen blanket on the reactor vessel and on all tanks to limit emissions from the tank vents, and through a refrigerated condenser used to collect and condense toluene vapor generated by the dryer. CAM does not apply to this facility.

Also included in this permit are miscellaneous exempt emissions units and/or activities.

Based on the initial Title V permit application received January 17, 2003, this facility is a major source of hazardous air pollutants (HAPs) (i.e. toluene). This facility is subject to 40 CFR 63 National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart FFFF – Miscellaneous Organic Chemical Manufacturing. This facility is subject to 40 CFR 63 National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart FFFF – Miscellaneous Organic Chemical Manufacturing.

(Note: The boiler and process heaters at this facility will be subject to 40 CFR 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters, which has been recently signed but not yet promulgated in the Federal register. However based on their heat input rate capacity and the fuel type (natural gas) used, the NESHAP does not contain any requirements of any type that will be applicable to this facility.)

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