

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 15, 2006

Mr. Bhargav Kandula
Product Line Engineer
ST Inverter America, Inc.
6350 West Sam Houston Parkway North, Suite 200
Houston, Texas 77041

Re: Case-by-Case De Minimis Request
Registration Number: 78737
Foam Packaging Facility
Houston, Harris County
Regulated Entity Number: RN104930193
Customer Reference Number: CN603019753

Dear Mr. Kandula:

This is in response to your De Minimis request, Form PI-1D entitled "Application Form for case-by-case De Minimis Review," concerning the proposed installation and operation of a foam packaging facility in Houston, Harris County, Texas. Estimated emission rate from this equipment will be less than 0.002 pound per year of polymethylene polyphenyl isocyanate.

After evaluation of the information which you have furnished, we have determined that your proposed facility will meet the requirements of Title 30 Texas Administrative Code § 116.119(a)(4) for a case-by-case De Minimis facility review. On this basis, no permit will be required. You are reminded that regardless of whether a construction permit is required, this facility must be in compliance with all air quality rules and regulations of the Texas Commission on Environmental Quality (TCEQ) at all times.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Ms. Louise A. Ngo, P.E., at (512) 239-1267 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

RECEIVED

AUG 28 2006

TCEQ
CENTRAL FILE ROOM

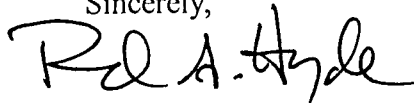
Mr. Bhargav Kandula

Page 2

June 15, 2006

This action is authorized on behalf of the TCEQ Executive Director.

Sincerely,

A handwritten signature in black ink, appearing to read "R. A. Hyde". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Richard A. Hyde, P.E., Director

Air Permits Division

Office of Permitting, Remediation, and Registration

Texas Commission on Environmental Quality

RAH/LAN/bob

cc: Air Program Manager, Region 11 - Austin

Project Number: 122285

Case-by-Case De Minimis Request Technical Review

Company:	ST Inverter America, Inc.	Registration No.:	78737
City:	Houston	Project No.:	122285
County:	Harris	Account No.:	
Project Type:	DMIN	Regulated Entity No.:	RN102762275
Project Reviewer:	Ms. Louise Ngo	Customer Reference No.:	CN602858557
Facility Name:	Foam Packaging Facility		

Project Overview

ST Inverter America, Inc. (STIA) has applied for a case-by-case De Minimis (30 TAC 116.119(a)(4)) project. This project is to authorize the installation and operation of a foam packaging facility in Houston, Harris County. Estimated emissions from this operation will be less than 0.002 lb/yr of polymethylene polyphenyl isocyanate (MDI).

Request For Comments

Region 12		Reviewed by:	No response
Toxicology	X	Reviewed by:	Manny Reyna
Modeling:	X	Reviewed by:	Kimberly Krause and Dan Schultz

Review Summary

Process & Source Description

The company manufactures general purpose inverter, primarily used as a motor drive. These inverters are used to control the speed and torque of an industrial AC motor. Individual parts and electronic components are assembled to make the inverters or finished goods. Traces of MDI emissions occur when an Instapak compound A & B is used to form polyurethane foam for the packaging of some finished goods.

Screen modeling was performed by TCEQ modeling staff. The GLCmax is located on the property line and it is predicted to be less than 0.1% of its short term ESL of 3 ug/m3. Estimated MDI emissions will be less than 0.002 pounds per year.

Impacts evaluation

- | | |
|--|--|
| 1. Is the de minimis facility the only source of these air contaminants on the site? | ☒ Yes ☐ No |
| 2. Was SCREEN modeling done? Yes, previously | ☐ Facility only ☒ Site-wide |
| 3. Federal Criteria Pollutants (NAAQS) impacts less than federal de minimis levels? | ☒ N/A ☐ Yes ☐ No |
| 4. State Pollutant Regulations impacts less than 1% of state limits? | ☒ N/A ☐ Yes ☐ No |
| less than 2% of state limits? | ☒ N/A ☐ Yes ☐ No |
| 5. Specific Constituents 1-hour and annual evaluation for each speciated constituent | |
| Are impacts less than or equal to 10% of ESLs? | ☒ Yes ☐ No |

Other information (if needed): None.

Should this type of facility/source be considered as an addition to the "De Minimis List"?

☐ Yes ☒ No

Louise A. Ngo 06/09/06
Permit Reviewer Date

James B Randall 6/9/06
Team Leader/Section Manager/Backup Date

Texas Commission On Environmental Quality

INTEROFFICE MEMORANDUM

To: Louise Ngo, P.E.
Chemical Section

Date: May 18, 2006

Thru: *K3* Robert Opiela, Team Leader *5/18/06*
Emissions Banking/Modeling Team (EBMT)

From: Kimberly Krause and Dan Schultz
EBMT

Subject: Modeling Audit – ST Inverter America, Inc. (RN104930193)

1.0 Project Identification Information.

Permit Application Number: 78737
NSR Project Number: 122285
EBMT Project Number: 2352
Air/NSRPermits Document Number: 327859
County: Harris

Modeling Report: EBMT staff conducted modeling on behalf of STI Inverter America, Inc. in March 2006.

- 2.0 Report Summary. The modeling analysis is acceptable for all review types and pollutants. Two modeling runs were completed using rural and urban dispersion. The GLCmax is located on the property line. The worse case results are summarized below.

Table 1. Sitewide Modeling Results for Health Effects			
Pollutant & CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
polymethylene polyphenylisocyanate (9016-87-9)	1-hr	0.0007	0.3

- 3.0 Land Use. Rural and urban dispersion coefficients were used in the modeling analysis. Flat terrain was used in the modeling analysis. EBMT practice is to use flat terrain when modeling low-level fugitives due to the treatment of terrain in ISC. Modeling low-level fugitive sources considering terrain may result in under-prediction of pollutant concentrations.
- 4.0 Modeling Emissions Inventory. The modeled emission area source release height and rates were consistent with the data provided by the company. The modeled area source dimensions of 48 meters by 77 meters for Building 1 were smaller than indicated on the plot plan. Plot plan dimensions are 48 meters by 191 meters. The parameters modeled result in conservative concentrations. The source characterization used to represent the sources (multiple roof vents) was appropriate for low-level fugitive emissions.

Louise Ngo, P.E.

Page 2 of 2

May 18, 2006

Modeling Audit – ST Inverter America, Inc.

- 5.0 Building Wake Effects (Downwash). Building downwash is not applicable for area source modeling.
- 6.0 Meteorological Data. The full meteorology option was chosen.
- 7.0 Receptor Grid. The grid modeled was extensive enough in density and spatial coverage to capture representative maximum ground-level concentrations.
- 8.0 Model Used and Modeling Techniques. SCREEN3 (Version 96043) was used.

A unitized emission rate of 1 lb/hr was used to predict a generic short-term impact for the area source. The generic impact was multiplied by the proposed pollutant specific emission rate to calculate a maximum predicted concentration.



Texas Commission on Environmental Quality

Form PI-1D

Application Form for Case-by-Case De Minimis Review



CONFIDENTIAL

The TCEQ requires that a Core Data Form be submitted on all applications. If a Customer Reference Number has been issued by the TCEQ and no core data information has been issued, then the number must be noted on the request call (512) 239-5175 or go to the TCEQ Web site at: www.tceq.texas.gov

Please contact the Air Permits Division with any questions at (512) 239-5175 or go to the TCEQ Web site at: www.tceq.texas.gov to: Texas Commission on Environmental Quality, Office of Permitting, P.O. Box 13087, Austin Texas 78711-3087.

Customer Reference Number
Reference Number
Core Data Form,

may be addressed
division (MC-162),

application can
not be CONFIDENTIAL

II. GENERAL INFORMATION

A. Is "CONFIDENTIAL" information being submitted?

☒ YES ☐ NO

If "YES," is each "confidential" page marked "CONFIDENTIAL"?

☒ YES ☐ NO

B. Is this request in response to a Notice of Violation?

☐ YES ☒ NO

C. Please estimate the net number of new jobs which will be created or sources in this request.

III. APPLICANT INFORMATION

A. Company or Other Legal Name: ST Inverter America

B. Company Official Contact Name and Title: Bhargav kandula, Product Line Engineer

Mailing Address: 6350 W. Sam Houston Pkwy N. Suite # 200

City: Houston

State: TX

Zip Code: 77041

Telephone: 281-506-3114

Fax: 281-506-3101

E-mail: bhargav76@hotmail.com

C. Account Identification Number (leave blank if new facility and site):

D. Facility Location Information:

Street Address: 6350 W. Sam Houston Pkwy N. Suite # 200

If no street address, provide driving instructions to the site in writing:

City: Houston

County: TX

Zip Code: 77041

E. Is a TCEQ Core Data Form (TCEQ Form #10400) attached?

☒ YES ☐ NO

F. TCEQ Customer Reference Number (leave blank if unknown):

G. TCEQ Regulated Entity Number (leave blank if unknown):

III. FACILITY AND SOURCE INFORMATION

A. Name and Type of Facility:

B. Operating Schedule: Hours/Day: 8 Days/Week: 5 Weeks/Year: 52/yr

C. For a new facility, enter the proposed start date of operation:

D. For an existing facility, enter the actual start date of operation:

11-01-2003

E. Are there other facilities or sources at the site which emit the same air contaminants?

☐ YES ☒ NO

If "YES," please attach description of the facilities, their emission rates, and how they are authorized.



Texas Commission on Environmental Quality



CONFIDENTIAL

Form PI-1D

Application Form for Case-by-Case De Minimis Review

III. FACILITY AND SOURCE INFORMATION (continued)

F. Is a facility description and emissions information attached?

☒ YES ☐ NO

Note: It is important to note that since de minimis is intended to exempt a facility from having to obtain any air authorization, all emissions associated with the facility, or any group of facilities, must meet de minimis criteria.

IV. FEDERAL APPLICABILITY INFORMATION

A. Is the proposed or existing facility located at a site or is it a source designated as major under the following:
If "YES," to any part in Section IV. A., you can not apply for de minimis.

1. Title 30 TAC § 116.150 Nonattainment

☐ YES ☒ NO

2. Title 30 TAC § 116.160 Prevention of Significant Deterioration

☐ YES ☒ NO

3. Title 30 TAC § 116.180 FCAA § 112(g) Hazardous Air Pollutants (HAPS)

☐ YES ☒ NO

4. Title 30 TAC § 122.10(13) Federal Operating Permit

☐ YES ☒ NO

B. Does a MACT standard in Title 40 CFR Chapter 63 apply to this facility?

☐ YES ☒ NO

C. Does a NESHAP standard in Title 40 CFR Chapter 61 apply to this facility?

☐ YES ☒ NO

D. Does a NSPS standard in Title 40 CFR Chapter 60 apply to this facility?

☐ YES ☒ NO

V. IMPACTS ANALYSIS

A. Impacts analysis through SCREEN modeling will be performed by TCEQ APD staff.
No area map is required since all off-property receptors are considered "sensitive".

VI. COPIES OF THIS APPLICATION

A. Form PI-1D, Core Data Form, and all attachments have been sent to the TCEQ in Austin:

☒ YES ☐ NO

B. A copy of this application form, Core Data Form and all attachments have been sent to the TCEQ Regional Office:

☒ YES ☐ NO

C. A copy of this application form, Core Data Form and all attachments have been sent to the appropriate local air pollution control program(s) (if applicable):

☒ YES ☐ NO

VII. SIGNATURE:

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I have read and understand TWC §§ 7.177 - 7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC § 7.187, pertaining to CRIMINAL PENALTIES.

NAME: Gregory Koci

SIGNATURE:

(Original Signature Required)

DATE: 03/24/2006

RECEIVED
APR 17 2006
AIR & WASTE DIVISION

RECEIVED

APR 18 2006

AIR & WASTE
APPLICATIONS TEAM

**CONFIDENTIAL**

TCEQ Core Data Form

TCEQ Use Only

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

Individuals are entitled to request and review their personal information that the agency gathers on its forms.
They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

SECTION II: General Information										
1. Reason for Submission <i>Example: new wastewater permit; IHW registration; change in customer information; etc.</i>										
To apply for Case-by-Case De Minimis Review <i>NSK HCN</i>										
2. Attachments		Describe Any Attachments: (ex: Title V Application, Waste Transporter Application, etc.)								
☒	YES	☐	NO	Case-by-Case De minimis Review (PI-1D)						
3. Customer Reference Number-If issued					4. Regulated Entity Reference Number-If issued					
CN		(9 digits)			RN		(9 digits)			
SECTION III: Customer Information										
5. Customer Role (Proposed or Actual) -- As It Relates to the Regulated Entity Listed on This Form										
Please check <u>one</u> of the following:										
☒		Owner		☒		Operator		☐		
☐		Occupational Licensee		☐		Volunteer Cleanup Applicant		☐		
☐		TCEQ Use Only		☐		Superfund		☐		
☐		PST		☐		Respondent		☐		
6. General Customer Information										
☒		New Customer			Change to Customer Information					
☐		Change in Regulated Entity Ownership			No Change*					
*If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.										
7. Type of Customer:										
☐		Individual			☐					
☐		Partnership			☒					
☐		State Government			☐					
☐		County Government			☐					
☐		Other Government			☐					
☐		Other			☐					
8. Customer Name (If an individual, please print last name first)										
ST Inverter America <i>INC.</i>					If New Name, Enter Previous Name					
9. Mailing Address										
6350 W. Sam Houston Pkwy N. Suite # 200										
City State ZIP ZIP + 4										
Houston TX 77041										
10. Country Mailing Information if outside USA										
11. E-Mail Address if applicable										
bhargav.kandula@stiadrives.com										
12. Telephone Number										
(281) 506-3114										
13. Extension or Code										
(281) 506-3101										
14. Fax Number if applicable										
15. Federal Tax ID (9 digits)										
753083289										
16. State Franchise Tax ID Number if applicable										
17. DUNS Number if applicable (9 digits)										
18. Number of Employees										
☐		0-20		☐		21-100		☒		
☐		101-250		☐		251-500		☐		
☐		501 and higher		☐		19. Independently Owned and Operated?		☒		
☐		Yes		☐		No		☐		
SECTION III: Regulated Entity Information										
20. General Regulated Entity Information										
☒		New Regulated Entity			Change to Regulated Entity Information			No Change*		
*If "No Change" and Section I is complete, skip to Section IV - Preparer Information.										

Press the Tab Key to continue to page 2.

**CONFIDENTIAL**

21. Regulated Entity Name (If an individual, please print last name first)					
ST Inverter America					
22. Street Address (No PO Boxes)		6350 W. Sam Houston Pkwy N.			
		Suite # 200			
		City	State	ZIP	ZIP + 4
		Houston	TX	77041	
23. Mailing Address		6350 W. Sam Houston Pkwy N.			
		Suite # 200			
		City	State	ZIP	ZIP + 4
		Houston	TX	77041	
24. E-Mail Address:		bhargav.kandula@stiadrives.com			
25. Telephone Number		26. Extension or Code		27. Fax Number if applicable	
(281) 506-3114				(281) 506-3101	
28. Primary SIC Code (4 digits)		29. Secondary SIC Code (4 digits)		30. Primary NAICS Code (5 or 6 digits)	
3625					
31. Secondary NAICS Code (5 or 6 digits)					
32. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description)					
Manufacture Motor Drives					
Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.					
33. County		Harris			
34. Description of Physical Location					
35. Nearest City		State		Nearest Zip	
Houston		TX		77041	
36. Latitude (N)		37. Longitude (W)			
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	51	40.68	95	33	47.88
38. TCEQ Programs In Which This Regulated Entity Participates Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "Unknown". If you know a permit or registration # for this entity, please write it below the program.					
☐	Animal Feeding Operation	☐	Petroleum Storage Tank	☐	Water Rights
☐		☐		☐	
☐	Title V - Air	☐	Wastewater Permit	☐	
☐		☐		☐	
☐	Industrial & Hazardous Waste	☐	Water Districts	☐	
☐		☐		☐	
☐	Municipal Solid Waste	☐	Water Utilities	☐	Unknown
☐		☐		☐	
☒	New Source Review - Air	☐	Licensing - Types	☐	
☐	116.119	☐		☐	
SECTION IV: Preparer Information					
39. Name			40. Title		
Bhargav Kandula			Product Line Engineer		
41. Telephone Number		42. Extension or Code		43. Fax Number if applicable	
(281) 506-3114				(281) 506-3101	
44. E-mail Address:		bhargav.kandula@stiadrives.com			

APR 18 2006

AIR & WASTE
APPLICATIONS TEAM

From: <Bhargav.Kandula@US.Schneider-Electric.com>
To: "Louise Ngo" <LNGO@tceq.state.tx.us>
Date: 5/1/2006 1:34:06 PM
Subject: Re: DeMinimis Application - Technical Review

Hello Louis,

I apologise for the inconvenience, the documents need not be confidential. Please find the attachments to replace the necessary original documents. Please let me know if you need more information.

Thanks,
Bhargav Kandula
ST Inverter America
281 506 3114
bhargav.kandula@stiadrives.com

Bhargav Kandula
ST Inverter America
281 506 3114
bhargav.kandula@stiadrives.com

"Louise Ngo" <LNGO@tceq.state.tx.us>
05/01/2006 11:15 AM

To
<Bhargav.kandula@stiadrives.com>
cc
"Lori Wilson" <LWilson@tceq.state.tx.us>
Subject
DeMinimis Application - Technical Review

Bhargav,

I received your application last week for a technical review. Similar to a full air quality permit review, it will be subject to modeling/modeling audit, health effects review, comments to TCEQ regional office/local programs and putting the final product together (technical review summary, cover letter, etc.). Anyway, for all the confidential information that you submitted (everything is marked confidential, except the application form), I will need a non-confidential version since the review cannot be confidential in nature.

Thanks,
Louise

Attachments for form PI-1D

Apr-11-06

Facility Description and Emission Information

ST Inverter America (STIA) manufactures general purpose inverter, primarily used as a motor drive (SIC: 3625). These devices are primarily used to control the speed and torque of an industrial AC motor.

Process: Procure individual parts and electronic components, assemble the parts to make a finished good (General purpose inverter), test all the finished goods, package and ship it. Please see the attached "**Plant layout**" and "**Floor plan**".

The emissions are found during the packaging of some finished goods, where an Instapak compound A & B is used. During the process traces of MDI vapor are emitted. The typical chemical reaction process and the estimate of the **MDI calculations** are **provided by the manufacturer**. STIA estimates are as below.

MDI ESL value: 0.5 $\mu\text{g}/\text{yr}$
MDI emitted: 1.63×10^{-3} Lbs/yr
MDI Emitted/hr: 6.27×10^{-6} Lbs/hr (Max. usage: 1 hr / Day of continuous usage)

These emissions will enter air through the vents located on the roof top as des:
Roof line: Inclined roof 32'-2" through 29' 4-38"
Vents: 2' above the roof and they are located as shown in the attachment
"Building 1 site plan"

P.S: For more details and sample STIA screen model see the attached e-mail from Lori Wilson, Air permits division, TCEQ.

Sincerely,
Bhargav Kandula
Product Line Eng.
ST Inverter America
281 506 3114
Bhargav.kandula@stiadrives.com

REGIONAL / LOCAL PROGRAM COMMENTS

Copy of Request Received by your Office: YES NO:

Date Received:

Investigator's/Compliance Officer's Name:

Phone:

Date of Last Site Visit:

GENERAL COMMENTS:

No objection to de minimis request

If you have any objections, please note them here:

TEJUANA (KESHA) RAGIN
INSUFFICIENT STAFF TO
CONDUCT SITE REVIEW
4/27/06

PLEASE SEND COMMENTS TO THE PERSON IDENTIFIED BELOW. (To avoid delays, please do not send this back to the Air Applications Team.):

	To: Stephanie Howell - Air Permits Division - Austin (M/A)	E-Mail: showell	Phone: (512) 239-1560
X	To: Mike Gould - Air Permits Division - Austin (M/C)	E-Mail: mgould	Phone: (512) 239-1097
	To: Erik Hendrickson - Air Permits Division - Austin	E-Mail: ehendric	Phone: (512) 239-1095
	To: Mike Coldiron - Air Permits Division - Austin	E-Mail: mcoldiro	Phone: (512) 239-5027
	To: Dana Vermillion - Air Permits Division - Austin	E-Mail: dpoppa	Phone: (512) 239-1280
	To:	E-Mail:	Phone:

LOUSE
NGU

T7/UN

Request for Comments -De Minimis Request

TCEQ -- Air Permits Division

Phone: (512)239-1250

Fax: (512)239-1300

Mailing Address: TCEQ, Air Permits Division, P.O. Box 13087, Austin, TX 78711-3087

Air, RN143-934-193/
78737/PA

REGIONAL OFFICES/LOCAL PROGRAM: Air Permits Division has received a request for a review of the de minimis facility below. If accepted, this facility will not be required to obtain a preconstruction permit. Please make appropriate comments, regarding the referenced request and return to the Air Permits Division no later than the comments deadline which is 10 days from the submittal date. If comments are not received by deadline, then "no comments" is assumed. Site visits are encouraged, but not required for this request.

Submitted by Air Permits Initial Review Team

E-Mail ID: @tceq.state.tx.us

TO: Region: 12

City: Houston

County: Harris

GENERAL INFORMATION

Date Request Submitted: 04/21/2006

Comments Deadline: (10 days from the Date Request Submitted)

Date Application Received by the Air Permits Initial Review Team: April 17, 2006

Type of Facility:

Project Number: 122285

Permit Number: 78737

TCEQ ACCOUNT NO.:

Regulated Entity No.: RN104930193

Customer No.: CN603019753

Company Name: St Inverter America Inc

Plant Name: St Inverter America

County: Harris

Technical Contact: Bhargav Kandula

Phone: (281) 506-3114

Local Program Applicable?: ☒ Yes: , No Local Programs: HarrisHouston

Summary of Request:

INFORMATION COPY

Attachments for form PI-1D

May-01-06

Facility Description and Emission Information

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MDI ESL value: 0.5 µg/yr
MDI emitted: 1.63×10^{-3} Lbs/yr
MDI Emitted/hr: 6.27×10^{-6} Lbs/hr (Max. usage: 1 hr / Day of continuous usage)

These emissions will enter air through the vents located on the roof top as des:
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Vents: 2' above the roof and they are located as shown in the attachment
"Building 1 site plan"

P.S: For more details and sample STIA screen model see the attached e-mail from Lori Wilson, Air permits division, TCEQ.

Sincerely,
Bhargav Kandula
Product Line Eng.
ST Inverter America
281 506 3114
Bhargav.kandula@stiadrives.com



"Lori Wilson"
<LWilson@tceq.state.tx.us>
03/22/2006 12:54 PM

To <Bhargav.Kandula@US.Schneider-Electric.com>

cc "Louise Ngo" <LNGO@tceq.state.tx.us>

bcc

Subject Re: Fw: ESL estimation for Instapak compound A-40W to
meet TCEQ Diminimis permit

For Follow Up: Urgent Priority. Follow up on 03/29/2006 at 03:45 PM

History: This message has been forwarded.

Bhargav, I ran a screen model (attached) based on the representations you have provided over phone and via email. The maximum impact per 1 lb/hr of emissions is 114 ug/m³. If I multiply this number times your proposed MDI maximum hourly emission rate of 6.27×10^{-6} lb/hr there is a modeled impact of 0.0007 ug/m³, which would be below 10% of the MDI Effects Screening Level.

However, this modeling run was only a tool to help you decide if a de minimis authorization could be appropriate. You still must fill out the application which will undergo a technical review including a review of the emission rates, modeling, etc. Please let me know if you have any other questions. Thanks.

Lori

Lori Wilson
Air Permits Division
512-239-1635

>>> <Bhargav.Kandula@US.Schneider-Electric.com> 3/22/2006 12:00 PM >>>

Hello Lorri,

- 1) Attached is a structural drawing that should answer height. The roof line is inclined starting at 32'-2" above the slab in the front down to 29' 4-3/8" at the rear. (Take the height as 29' 4-3/8" for the worst case)
- 2) The only fresh air ventilation we are aware of are the fresh air intakes on the roof top air handlers (of which we have many) reference the attached drawings. Those vents would be about 2' above the roof line (our estimate).
- 3) Enclosed are a copy of the site plan to answer the property line. Our tenancy is within building 1. Also, note that we are one of three tenants in this building 1. Our nearest neighbor is directly adjacent to us.

Thanks,
Bhargav Kandula
ST Inverter America
281 506 3114
bhargav.kandula@stiadrives.com

----- Forwarded by Bhargav Kandula/US/Schneider on 03/22/2006 11:42 AM -----

Mike Murphy/US/Schneider

03/22/2006 11:38 AM

To
cc

Bhargav Kandula/US/Schneider@Americas

Subject: Re: Fw: ESL estimation for Instapak compound
A-40W to meet TCEQ Diminimis permit [Link](#)

MM

Bhargav Kandula/US/Schneider

03/22/2006 11:01 AM

To: mike.murphy@stiadrives.com,
LWilson@tceq.state.tx.us
cc: greg.koci@stiadrives.com
Subject: Fw: ESL estimation for Instapak compound A-40W
to meet TCEQ Diminimis permit

Hello Mike,

Thank you for providing the plant layout details. Can you also provide the following details of our facility:

1. the height of the building
2. heights of the two vents
3. distance to the closest property line from the building

Thanks,
Bhargav Kandula
ST Inverter America
281 506 3114
bhargav.kandula@stiadrives.com

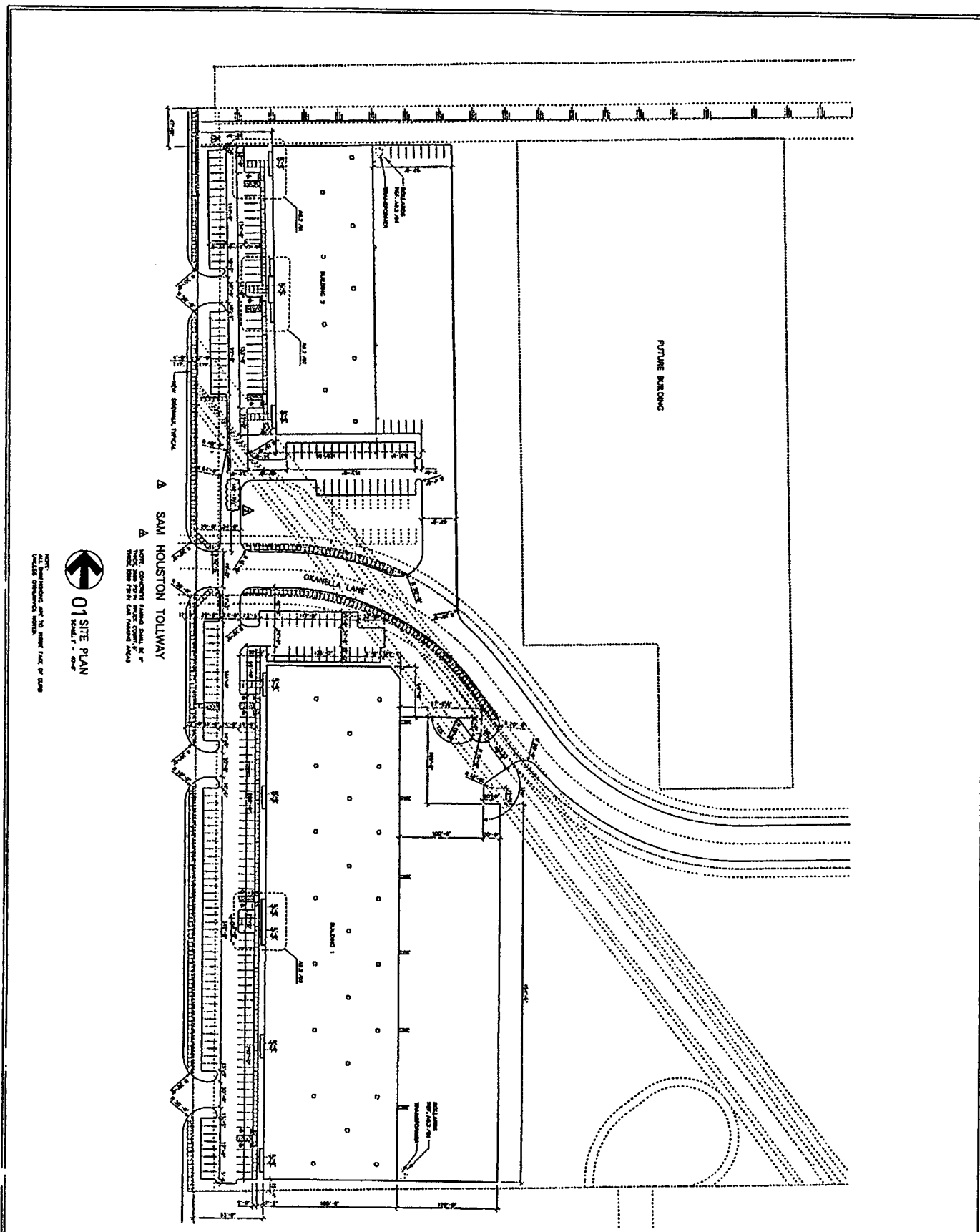
----- Forwarded by Bhargav Kandula/US/Schneider on 03/22/2006 10:52 AM -----

"Lori Wilson"

<LWilson@tceq.state.tx.us>

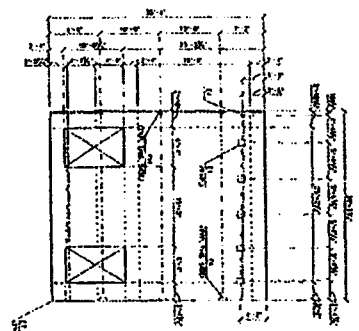
03/22/2006 09:41 AM

To: <Bhargav.Kandula@US.Schneider-Electric.com>
cc:
Subject: Re: ESL estimation for Instapak compound A-40W to meet
TCEQ Diminimis permit

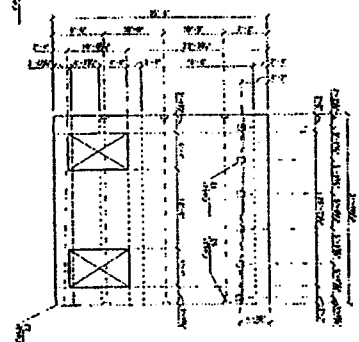


01 SITE PLAN
 SCALE: 1" = 50'-0"

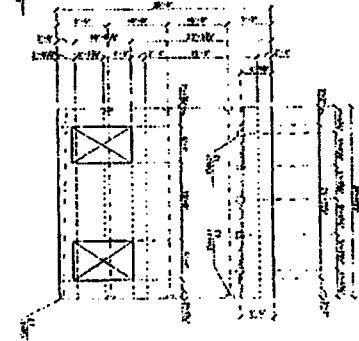
DATE: 10/1/01 BY: [Signature] CHECKED: [Signature] APPROVED: [Signature] PROJECT: NORTHWEST BUSINESS PARK SHEET: 1 OF 1		Halff Associates, Inc. ENGINEERS • ARCHITECTS • SCIENTISTS • PLANNERS • SURVEYORS 3320 KIRBY STREET, SUITE 1000 HOUSTON, TEXAS 77098 TEL: (713) 623-7800 FAX: (713) 623-4229	PROTERRA PROPERTIES INC.	NORTHWEST BUSINESS PARK Houston, Texas
---	--	---	---	--



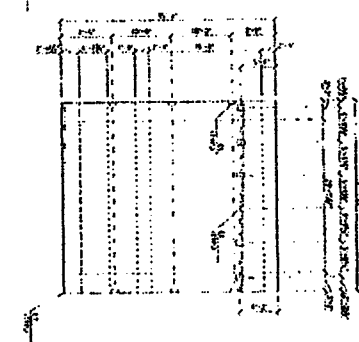
01 PANEL P1 - BUILDING #1



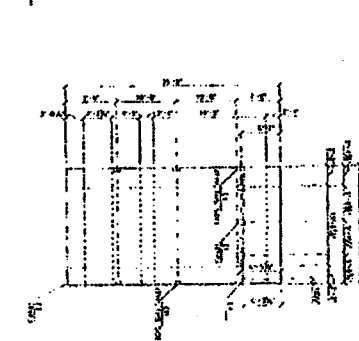
02 PANEL P2 - BUILDING #1



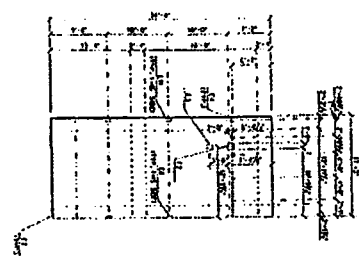
03 PANEL P3 - BUILDING #1



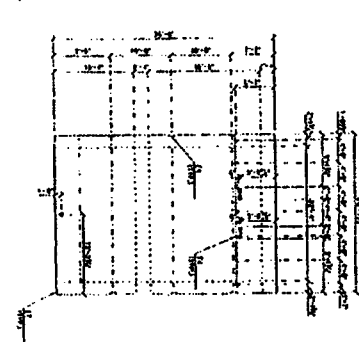
04 PANEL P4 - BUILDING #1



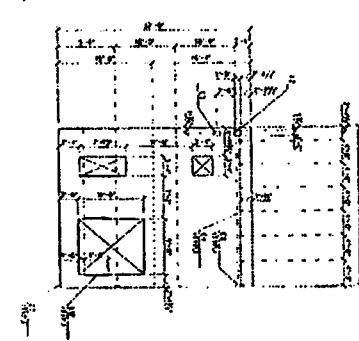
05 PANEL P5 - BUILDING #1



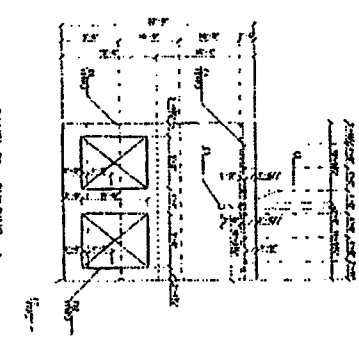
06 PANEL P6 - BUILDING #1



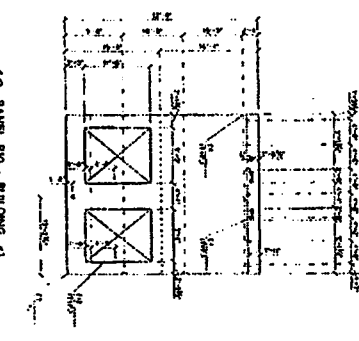
07 PANEL P7 - BUILDING #1



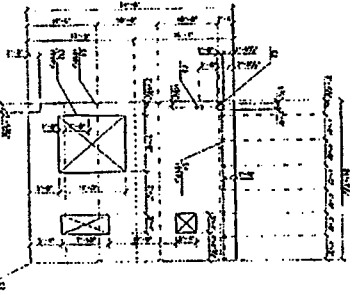
08 PANEL P8 - BUILDING #1



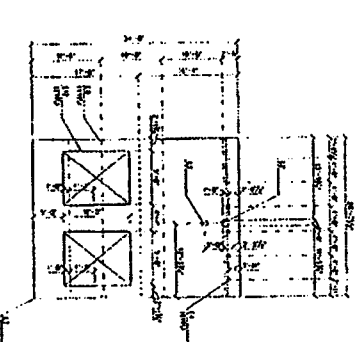
09 PANEL P9 - BUILDING #1



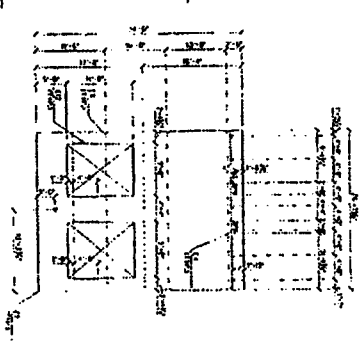
10 PANEL P10 - BUILDING #1



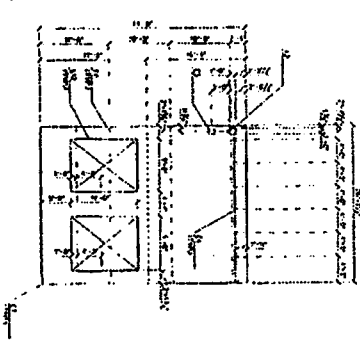
11 PANEL P11 - BUILDING #1



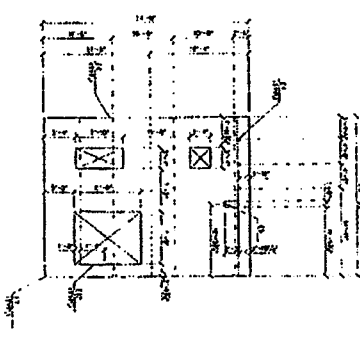
12 PANEL P12 - BUILDING #1



13 PANEL P13 - BUILDING #1



14 PANEL P14 - BUILDING #1



15 PANEL P15 - BUILDING #1

ALL PANELS SHOWN ON THIS SET ARE TO BE CONSTRUCTED IN ACCORDANCE WITH THE LATEST EDITIONS OF THE AISC STEEL EDITIONS AND THE AISC STEEL EDITIONS.

PI.1



Halff Associates, Inc.
 ENGINEERS • ARCHITECTS • SCIENTISTS • PLANNERS • SURVEYORS
 4905 KERRY STREET, SUITE 100
 HOUSTON, TEXAS 77056
 713.553.7754
 FAX 770.553.0375



NORTHWEST
 BUSINESS PARK
 Houston, Texas

Bhargav, Please also tell me:

1. the height of the building
2. heights of the two vents
3. distance to the closest property line from the building

Thank you.

Lori

Lori Wilson
Air Permits Division
512-239-1635

>>> <Bhargav.Kandula@US.Schneider-Electric.com> 3/21/2006 3:01 PM >>>

Hello Lorri Wilson,

It was nice talking to the right person. Thank you very much for your assistance and suport to do the ESL modeling

It will be good, if STIA can meet the 10 % ESL requirement inorder to qualify for the 116.119 (4) Deminimis facilities or sources permit.

MDI ESL value: 0.5 ug/Yr

MDI emitted : 1.63×10^{-3} lbs/ yr

MDI Emitted (per hr): 6.278×10^{-6} lbs/hr (based on 1 hr of continuos usage per day).

STIA , manufactures motor drives to control the speed, torque of motors and it is a complete indoor facility (SIC: 3625).

The facility is one floor and the floor plan is as shown in the attachments. We have a few vents on the manufacturing floor. The office area (vacant area in the plant layout) is partitioned from the manufacturing are.

Please let me know, if you need any more information.

Thanks,
Bhargav Kandula
ST Inverter America
6350 W. Sam Houston Pkwy N. Suite # 200
Houston, TX -77041

281 506 3114
bhargav.kandula@stiadrives.com

This email has been scanned for SPAM content and Viruses by the MessageLabs Email Security System.

From: Julie Steger
To: RFCAIR12
Date: 4/21/2006 11:42:03 AM
Subject: Site Review/Request for Comments for Project Number122285

This is a request for comments. Please respond within 24 hours that you have received this email.

CC: air_permits@hctx.net; dan.hoyt@cityofhouston.net; hal.nichols@cityofhouston.net

Request for Comments -De Minimis Request**TCEQ – Air Permits Division****Phone: (512)239-1250****Fax: (512)239-1300****Mailing Address: TCEQ, Air Permits Division, P.O. Box 13087, Austin, TX 78711-3087**

REGIONAL OFFICES/LOCAL PROGRAM: Air Permits Division has received a request for a review of the de minimis facility below. If accepted, this facility will not be required to obtain a preconstruction permit. Please make appropriate comments, regarding the referenced request and return to the Air Permits Division no later than the comments deadline which is **10 days** from the submittal date. If comments are not received by deadline, then "no comments" is assumed. Site visits are encouraged, but not required for this request.

Submitted by Air Permits Initial
Review Team

E-Mail ID: @tceq.state.tx.us

TO: Region: 12

City: **Houston**County: **Harris****GENERAL INFORMATION**Date Request Submitted: **04/21/2006**Comments Deadline: *(10 days from the Date Request Submitted)*Date Application Received by the Air Permits Initial Review Team: **April 17, 2006**

Type of Facility:

Project Number: **122285**Permit Number: **78737****TCEQ ACCOUNT NO.:****Regulated Entity No.: RN104930193****Customer No.: CN603019753**

Company Name: St Inverter America Inc

Plant Name: St Inverter America

County: **Harris**

Technical Contact: Bhargav Kandula

Phone: (281) 506-3114

Local Program Applicable?: **X** Yes: , No Local Programs: HarrisHouston

Summary of Request:

REGIONAL / LOCAL PROGRAM COMMENTS

Copy of Request Received by your Office: YES NO: Date Received:

Investigator's/Compliance Officer's Name: Phone:

Date of Last Site Visit:

GENERAL COMMENTS:

No objection to de minimis request

If you have any objections, please note them here:

PLEASE SEND COMMENTS TO THE PERSON IDENTIFIED BELOW. (To avoid delays, please do not send this back to the Air Applications Team.):

	To: Stephanie Howell - Air Permits Division - Austin (M/A)	E-Mail: showell	Phone: (512) 239-1560
X	To: Mike Gould - Air Permits Division - Austin (M/C)	E-Mail: mgould	Phone: (512) 239-1097
	To: Erik Hendrickson - Air Permits Division - Austin	E-Mail: ehendric	Phone: (512) 239-1095
	To: Mike Coldiron - Air Permits Division - Austin	E-Mail: mcoldiro	Phone: (512) 239-5027
	To: Dana Vermillion - Air Permits Division - Austin	E-Mail : dpoppa	Phone: (512) 239-1280
	To:	E-Mail:	Phone:

Julie Steger - PROJECT 122285

From: Norma Hernandez
To: Steger, Julie
Date: 4/21/2006 10:05 AM
Subject: PROJECT 122285
CC: Nelon, Donald Dale

CN603019753
ST INVERTER AMERICA INC

RN104930193
ST INVERTER AMERICA

Please call me if you have any questions.

Thank You
Norma
X2015

TRANSACTION REPORT

P. 01

APR-20-2006 THU 10:53 AM

FOR:

DATE START	RECEIVER	TX TIME	PAGES TYPE	NOTE	M# DP
APR-20 10:52 AM	5181	1' 12"	3 SEND	OK	065

TOTAL : 1M 12S PAGES: 3



Protecting Texas
by Reducing and
Preventing Pollution

FAX TRANSMITTAL

DATE: April 20, 2006 NUMBER OF PAGES (including this cover sheet):

3

TO: Name Central Registry
 Organization Attention: Central Registry
 FAX Number (512) 239-5181

FROM: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
 Name Julie Steger
 Division/Region Air and Waste Applications Team, Permits Administration Review Section
 Telephone Number (512) 239-1542
 FAX Number (512) 239-4500

Check Box

New Cust.	☒
New Reg Ent	☒

Check Box

Update Customer	☐
Update Regulated Entity	☐
Update All CN Info	☐
Update All RN Info	☐



Protecting Texas
by Reducing and
Preventing Pollution

FAX TRANSMITTAL

DATE: April 20, 2002 NUMBER OF PAGES (including this cover sheet):

3

TO: Name Central Registry
Organization Attention: Central Registry
FAX Number (512) 239-5181

FROM: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Name Julie Steger
Division/Region Air and Waste Applications Team,
Permits Administration Review Section
Telephone Number (512) 239- 1542
FAX Number (512) 239-4500

Check Box

New Cust.	☒
New Reg Ent	☒

Check Box

Update Customer	☐
Update Regulated Entity	☐
Update All CN Info	☐
Update All RN Info	☐
New Affiliation	☐
New Reg/Permit #	☐

X 1st
Request

2nd
Request

Portable ☐

Attached is a CORE Data form or print out of CR Data. Please update Central Registry with the information on the form provided.

Company Name:	<u>ST INVERTER AMERICA INC.</u> Assumed Name: different than SOS Legal Name. Legal Name for TCEQ. Legal Name: Research shows name on CDF is Legal Name, not name currently in SOS.
Customer Number:	
Regulated Entity No.	
Account Number:	<u>—</u>
IMS Project Number:	<u>122285</u>
- Registration - (Please underline one)	<u>78735</u>

Please call if you should have any questions. Thank you.

(03/09/05)

application can
not be CONFIDENTIAL



Form PI-1D

Application Form for Case-by-Case De Minimis Review

The TCEQ requires that a Core Data Form be submitted on all incoming registrations unless a Regulated Entity and Customer Reference Number has been issued by the TCEQ and no core data information has changed. If a Regulated Entity or Customer Reference Number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at: www.tceq.state.tx.us/permitting/central_registry/guidance.html.

Please contact the Air Permits Division with any questions at (512) 239-1240, Fax: (512) 239-1300. Written inquiries may be addressed to: Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin Texas 78711-3087.

I. GENERAL INFORMATION		
A. Is "CONFIDENTIAL" information being submitted with this request?		☒ YES ☐ NO
If "YES," is each "confidential" page marked "CONFIDENTIAL" in large red letters?		☒ YES ☐ NO
B. Is this request in response to a Notice of Violation?		☐ YES ☒ NO
C. Please estimate the <u>net</u> number of <u>new</u> jobs which will be created as a result of the operation of the facility or sources in this request.		
II. APPLICANT INFORMATION		
A. Company or Other Legal Name: ST Inverter America		
B. Company Official Contact Name and Title: Bhargav kandula, Product Line Engineer		
Mailing Address: 6350 W. Sam Houston Pkwy N. Suite # 200		
City: Houston	State: TX	Zip Code: 77041
Telephone: 281-506-3114	Fax: 281-506-3101	E-mail: bhargav76@hotmail.com
C. Account Identification Number (leave blank if new facility and site):		
D. Facility Location Information:		
Street Address: 6350 W. Sam Houston Pkwy N. Suite # 200		
If no street address, provide driving instructions to the site in writing:		
City: Houston	County: TX	Zip Code: 77041
E. Is a TCEQ Core Data Form (TCEQ Form #10400) attached?		☒ YES ☐ NO
F. TCEQ Customer Reference Number (leave blank if unknown):		
G. TCEQ Regulated Entity Number (leave blank if unknown):		
III. FACILITY AND SOURCE INFORMATION		
A. Name and Type of Facility:		
B. Operating Schedule: Hours/Day: 8 Days/Week: 5 Weeks/Year: 52/yr		
C. For a new facility, enter the proposed start date of operation:		
D. For an existing facility, enter the actual start date of operation:		11-01-2003
E. Are there other facilities or sources at the site which emit the same air contaminants? If "YES," please attach description of the facilities, their emission rates, and how they are authorized.		☐ YES ☒ NO

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APR 17 2006

AIR PERMITS DIVISION

Received

APR 13 2006 122285
Air & Waste Applications Page 6 of 7

11/11/2010





Form PI-1D

Application Form for Case-by-Case De Minimis Review

III. FACILITY AND SOURCE INFORMATION (continued)

F. Is a facility description and emissions information attached?

☒ YES ☐ NO

Note: It is important to note that since de minimis is intended to exempt a facility from having to obtain any air authorization, all emissions associated with the facility, or any group of facilities, must meet de minimis criteria.

IV. FEDERAL APPLICABILITY INFORMATION

A. Is the proposed or existing facility located at a site or is it a source designated as major under the following:
If "YES," to any part in Section IV. A., you can not apply for de minimis.

1. Title 30 TAC § 116.150 Nonattainment

☐ YES ☒ NO

2. Title 30 TAC § 116.160 Prevention of Significant Deterioration

☐ YES ☒ NO

3. Title 30 TAC § 116.180 FCAA § 112(g) Hazardous Air Pollutants (HAPS)

☐ YES ☒ NO

4. Title 30 TAC § 122.10(13) Federal Operating Permit

☐ YES ☒ NO

B. Does a MACT standard in Title 40 CFR Chapter 63 apply to this facility?

☐ YES ☒ NO

C. Does a NESHAP standard in Title 40 CFR Chapter 61 apply to this facility?

☐ YES ☒ NO

D. Does a NSPS standard in Title 40 CFR Chapter 60 apply to this facility?

☐ YES ☒ NO

V. IMPACTS ANALYSIS

A. Impacts analysis through SCREEN modeling will be performed by TCEQ APD staff.
No area map is required since all off-property receptors are considered "sensitive".

VI. COPIES OF THIS APPLICATION

A. Form PI-1D, Core Data Form, and all attachments have been sent to the TCEQ in Austin:

☒ YES ☐ NO

B. A copy of this application form, Core Data Form and all attachments have been sent to the TCEQ Regional Office:

☒ YES ☐ NO

C. A copy of this application form, Core Data Form and all attachments have been sent to the appropriate local air pollution control program(s) (if applicable):

☒ YES ☐ NO

VII. SIGNATURE:

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I have read and understand TWC §§ 7.177 - 7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC § 7.187, pertaining to CRIMINAL PENALTIES.

NAME: Gregory Koci

SIGNATURE:

(Original Signature Required)

DATE: 03/24/2006

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APR 17 2006
AIR POLLUTION DIVISION

RECEIVED

APR 18 2006

AIR & WASTE
APPLICATIONS TEAM

**CONFIDENTIAL**

TCEQ Use Only

TCEQ Core Data Form

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

Individuals are entitled to request and review their personal information that the agency gathers on its forms.
They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.**SECTION I: General Information**1. Reason for Submission *Example: new wastewater permit; IHW registration; change in customer information; etc.*

To apply for Case-by-Case De Minimis Review

NSK HCU

2. Attachments

Describe Any Attachments: (ex: Title V Application, Waste Transporter Application, etc.)

☒

YES

☐

NO

Case-by-Case De minimis Review (PI-1D)

3. Customer Reference Number-if issued

4. Regulated Entity Reference Number-if issued

CN

(9 digits)

RN

(9 digits)

SECTION II: Customer Information

5. Customer Role (Proposed or Actual) -- As It Relates to the Regulated Entity Listed on This Form

Please check one of the following:

Owner

☒

Operator

Owner and Operator

Occupational Licensee

Volunteer Cleanup Applicant

Other

TCEQ Use Only

Superfund

PST

Respondent

6. General Customer Information

☒

New Customer

Change to Customer Information

Change in Regulated Entity Ownership

No Change*

*If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.

7. Type of Customer:

Individual

Sole Proprietorship - D.B.A.

Partnership

☒

Corporation

Federal Government

State Government

County Government

City Government

Other Government

Other

8. Customer Name (If an individual, please print last name first)

If New Name, Enter Previous Name

ST Inverter America

Inc.

9. Mailing Address

6350 W. Sam Houston Pkwy N. Suite # 200

City

State

ZIP

ZIP + 4

Houston

TX

77041

10. Country Mailing Information if outside USA

11. E-Mail Address if applicable

bhargav.kandula@stiadrives.com

12. Telephone Number

13. Extension or Code

14. Fax Number if applicable

(281) 506-3114

(281) 506-3101

15. Federal Tax ID (9 digits)

16. State Franchise Tax ID Number if applicable

17. DUNS Number if applicable (9 digits)

753083289

18. Number of Employees

19. Independently Owned and Operated?

0-20

21-100

☒

101-250

251-500

501 and
higher**RECEIVED**☒

No

SECTION III: Regulated Entity Information

20. General Regulated Entity Information

☒

New Regulated Entity

Change to Regulated Entity Information

No Change*

*If "No Change" and Section I is complete, skip to Section IV - Preparer Information.

Press the Tab Key to continue to page 2.

APR 18 2006
AIR & WASTE
APPLICATIONS TEAM

**CONFIDENTIAL**

21. Regulated Entity Name <i>(If an individual, please print last name first)</i>					
ST Inverter America					
22. Street Address (No PO Boxes)		6350 W. Sam Houston Pkwy N.			
		Suite # 200			
		City	State	ZIP	ZIP + 4
		Houston	TX	77041	
23. Mailing Address		6350 W. Sam Houston Pkwy N.			
		Suite # 200			
		City	State	ZIP	ZIP + 4
		Houston	TX	77041	
24. E-Mail Address:		bhargav.kandula@stiadrives.com			
25. Telephone Number		26. Extension or Code		27. Fax Number if applicable	
(281) 506-3114				(281) 506-3101	
28. Primary SIC Code (4 digits)	29. Secondary SIC Code (4 digits)		30. Primary NAICS Code (5 or 6 digits)		31. Secondary NAICS Code (5 or 6 digits)
3625					
32. What is the Primary Business of this entity? <i>(Please do not repeat the SIC or NAICS description)</i>					
Manufacture Motor Drives					
<i>Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.</i>					
33. County		Harris			
34. Description of Physical Location					
35. Nearest City			State	Nearest Zip	
Houston			TX	77041	
36. Latitude (N)			37. Longitude (W)		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	51	40.68	95	33	47.88
38. TCEQ Programs In Which This Regulated Entity Participates <i>Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "Unknown". If you know a permit or registration # for this entity, please write it below the program.</i>					
☐	Animal Feeding Operation	☐	Petroleum Storage Tank	☐	Water Rights
☐		☐		☐	
☐	Title V - Air	☐	Wastewater Permit	☐	
☐		☐		☐	
☐	Industrial & Hazardous Waste	☐	Water Districts	☐	
☐		☐		☐	
☐	Municipal Solid Waste	☐	Water Utilities	☐	Unknown
☐		☐		☐	
☒	New Source Review - Air	☐	Licensing - Types		
☐	116.119	☐			
SECTION IV: Preparer Information					
39. Name			40. Title		
Bhargav Kandula			Product Line Engineer		
41. Telephone Number		42. Extension or Code		43. Fax Number if applicable	
(281) 506-3114				(281) 506-3101	
44. E-mail Address:		bhargav.kandula@stiadrives.com			

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APR 18 2006

AIR & WASTE
APPLICATIONS TEAM