



FILE

# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

November 13, 2003

Mr. Robert Klingel  
President  
TSE Industries, Inc.  
5260 113<sup>th</sup> Avenue North  
Clearwater, FL 33762

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP):  
Miscellaneous Organic Chemical Manufacturing

Dear Mr. Klingel:

You indicated, in a 112(j) notification that you submitted last year, that TSE Industries would be subject to the NESHAP (40 CFR 63 Subpart FFFF) for Miscellaneous Organic Chemical Manufacturing. You may be interested in knowing that the USEPA published the **final** NESHAP regulation for this source category in the Federal Register on November 10, 2003. Therefore, 112(j) requirements no longer apply to Miscellaneous Organic Chemical Manufacturing emissions units.

If you are interested in reading the final standards, the NESHAP and a Fact Sheet explaining the standards may be accessed through the USEPA website at <http://www.epa.gov/ttn/atw/mon/monpg.html>.

If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or [Robert.Bull@dep.state.fl.us](mailto:Robert.Bull@dep.state.fl.us).

"Existing" affected sources must be in compliance with Subpart FFFF standards by November 10, 2006. For the purposes of Subpart FFFF, affected sources are "existing" if construction or reconstruction of the affected source commenced before April 5, 2002.

Since you also indicated in a 112(j) notification that TSE Industries would be subject to Subpart DDDDD-I/C/I Boilers and Process Heaters, you may still be required to submit a 112(j) MACT Title V permit revision application by April 28, 2004 for the affected emissions units; unless this proposed subpart is final by then.

If you have any questions concerning this information, please contact me at (850)921-9534 or [Cindy.Phillips@dep.state.fl.us](mailto:Cindy.Phillips@dep.state.fl.us).

Sincerely,

Cindy L. Phillips, P.E., Bureau of Air Regulation

c: Peter Hessling, Pinellas County DEM-AQD  
Jerry Kissel, FDEP-SWD

"More Protection, Less Process"

Printed on recycled paper.



5260 113th Avenue North  
Clearwater, FL 33760  
P.O.Box 17225 • Clearwater, FL 33762

Ph: (727) 573-7676  
Fax: (727) 572-0487

TSE INDUSTRIES, INC.

May 8, 2002

Ms. Cindy Philips, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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MAY 16 2002

BUREAU OF AIR REGULATION

**RE: Section 112(j) Notification for Major Sources of HAP**  
**Affected Industry Type: *Misc. Organic Chemical Production and Processes***  
**Project: Batch Reactor System for Production of *Thanacure T9***  
**FDEP Project No.: 1030207-003-AC**  
**Project Location: TSE Industries, Inc., 5260 113<sup>th</sup> Ave. N., Pinellas County**

CERTIFIED MAIL - Article #7000 0520 0016 5347 8046

Dear Ms. Philips:

This is to inform the Department per the requirements of Section 112(j) of the Clean Air Act that TSE Industries, Inc. (TSE), 5260 113<sup>th</sup> Avenue North, Clearwater, Florida is a major source of hazardous air pollutants (HAP) affected by 40 CFR 63, Subpart F, *Misc. Organic Chemical Production and Processes*. TSE manufactures, mills, stamps and molds urethane rubber. TSE secured a construction permit from the Department in January 2002 for a batch reactor system to produce *Thanacure T9* (T9), a plastics & rubber adhesion promoter. Since T9 is not listed among the compounds given in Table 1 of 40 CFR 63, Subpart F, the project was not subject to the Hazardous Organic NESHAP (HON) and the Southwest District asked TSE to submit a request for a Maximum Achievable Control Technology (MACT) Determination for control of the toluene emissions from the operation (excess toluene is needed in the reaction to obtain adequate conversion of T9, consequently potential toluene emissions exceed 10 ton/yr). However, due to the date of construction (March 1997), the MACT Determination was not applicable. The batch reactor system is a single emissions unit, however emissions can be vented through several processes.

Please feel free to contact this office at any time should you have questions concerning this notice.

Sincerely,

Robert Klingel  
President

cc: Dave Richcreek, TSE Industries, Inc.  
Gary Robbins, Pinellas County Department of Environmental Management  
Henry Gotch, PE, DARM FDEP-SWDist  
Doug Neeley, Air, Pesticides & Toxics Mgmt. USEPA-IV  
Cory Houchin, Environmental Sciences Group, Inc.

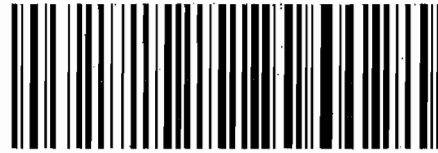


Environmental  
Sciences  
Group

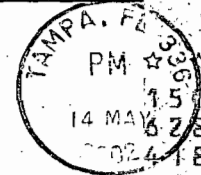
Post Office Box 7495

Tampa, Florida 33673

**CERTIFIED MAIL**

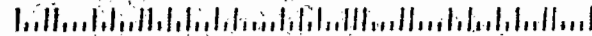


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TSE INDUSTRIES, INC.

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P.O. Box 17225, Clearwater, Florida 33762  
5260 113th Avenue North, Clearwater, Florida 33760  
(727) 573-7676 • Fax: 727-572-0487

BUREAU OF AIR REGULATION

May 8, 2002

Ms. Cindy Philips, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: Section 112(j) Notification for Major Sources of HAP**  
**Affected Industry Type: *Industrial, Commercial & Institutional Boilers and Indirect Process Heaters***  
**Project: Urethane Rubber Manufacturing/Milling**  
**FDEP Project No.: 1030207-003-AC**  
**Project Locations: TSE Industries, Inc., 5260 113<sup>th</sup> Ave. N., Pinellas County**  
**TSE Industries, Inc., 4370 112<sup>th</sup> Terrace N., Pinellas County**

CERTIFIED MAIL - Article #7000 0520 0016 5347 8060

Dear Ms. Philips:

This is to inform the Department per the requirements of Section 112(j) of the Clean Air Act that TSE Industries, Inc. (TSE), 5260 113<sup>th</sup> Avenue North, Clearwater, Florida is a major source of hazardous air pollutants (HAP) affected by 40 CFR 63 Subpart DDDDD, *Industrial, Commercial & Institutional Boilers and Indirect Process Heaters*. TSE manufactures, mills, stamps and molds urethane rubber. TSE operates a batch reactor system to produce *Thanacure T9* (T9), a plastics & rubber adhesion promoter. A 1 mmbtu/hr hot oil heater used in the T9 manufacturing process will be covered by this rule once promulgated, as will a reserve hot oil heater (3.7 mmbtu/hr) and two 0.7 mmbtu/hr dryers. A 3.35 mmbtu boiler located at TSE's facility at 4370 112<sup>th</sup> Terrace N. in Clearwater will also come under regulation by the proposed MACT. All of the affected sources utilize natural gas. Since T9 is not listed among the compounds given in Table 1 of 40 CFR 63, Subpart F, it was not subject to the Hazardous Organic NESHAP (HON) and the Southwest District asked TSE to submit a request for a Maximum Achievable Control Technology (MACT) Determination for control of the toluene emissions from the T9 process. However, due to the date of construction of the batch reactor system (March 1997), the MACT Determination was not applicable.

To summarize, the affected emissions units are

1. One Steam Boiler (3.35 mmbtu/hr) located at 4370 112<sup>th</sup> Terrace N., Clearwater
2. One Hot Oil Heater (1 mmbtu/hr) located at 5260 113<sup>th</sup> Ave. N., Clearwater
3. One Hot Oil Heater (3.7 mmbtu/hr) located at 5260 113<sup>th</sup> Ave. N., Clearwater
4. Two Dryers (0.7 mmbtu/hr) located at 5260 113<sup>th</sup> Ave. N., Clearwater

Please feel free to contact this office at any time should you have questions concerning this notice.

Sincerely,

Robert Klingel  
President

cc: Dave Richcreek, TSE Industries, Inc.  
Gary Robbins, Pinellas County Department of Environmental Management  
Henry Gotch, PE, DARM FDEP-SWDist  
Doug Neeley, Air, Pesticides & Toxics Mgmt. USEPA-IV  
Cory Houchin, Environmental Sciences Group, Inc.



Environmental Sciences Group

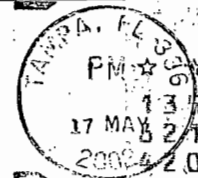
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