Environmental Sciences Group

January 29, 2004

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: Initial Notification for Sources Affected by 40 CFR 63 NESHAP Subpart FFFF *Miscellaneous Organic Chemical Manufacturing*
Source Operation: Batch Reactor System for Production of *Thanacure T9*
Source Owner/Operator: TSE Industries, Inc.
Source Locations: 5260 113th Ave. N. & 4370 112th Ter. N., Pinellas County

CERTIFIED MAIL - Article #7000 0520 0016 5339 8085

Dear Ms. Philips:

This is to inform the Department, per the requirements of NESHAP Section 63.9(b) and Section 63.2515(b), that TSE Industries, Inc. (TSE), with locations at 5260 113th Avenue North and 4370 112th Terrace North in Clearwater, Florida, is a major source of hazardous air pollutants (HAP) affected by 40 CFR 63 Subpart FFFF, *Miscellaneous Organic Chemical Manufacturing*. Subpart FFFF requires that affected sources be in compliance by November 10, 2006. The Subpart also requires that a *Precompliance Report* be submitted 6 months prior to the 11/10/06 compliance date.

TSE manufactures, mills, stamps and molds urethane rubber. TSE uses a batch reactor system to produce *Thanacure T9* (T9), a plastics & rubber adhesion promoter. Excess toluene is needed in the reaction (with toluene diisocyanate monomer) to obtain adequate conversion to T9, consequently potential toluene emissions exceed 10 ton/yr. TSE currently produces approximately 100,000 pounds of T9 per year; toluene consumption is approximately 6 ½ tons/year. Toluene is the only HAP emitted by the process.

The batch reactor system is a single emissions unit, however emissions can be vented through several processes. A vacuum pump is used to transfer material between vessels, therefore the vacuum pump vent will be a source of emissions. A centrifuge that is vented to the atmosphere recovers the product from the excess toluene. The *Rinse Tank*, a process vessel used to collect the toluene rinses from the centrifuge, is vented to the

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atmosphere. Both these points may well be a source of HAP emissions (a nitrogen blanket is used to prevent toluene loss).

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

Sincerely,

Cory A. Houchin
Project Manager

cc: Dave Richcreek, TSE Industries, Inc.
Gary Robbins, Pinellas County Department of Environmental Management
Eric Peterson, PE, DARM FDEP-SW Dist
Doug Neeley, Air, Pesticides & Toxics Mgmt. USEPA-IV