

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

FILE

August 28, 2003

Mr. Robert A. Haberlein, Ph.D., QEP
Engineering Environmental Consulting Services
Two Fisk Circle
Annapolis, MD 21401

RE: Additional Information for Xerxes Plant in Lakeland, Florida
Initial Notification of Applicability of 40 CFR 63 Subpart WWWW,
Reinforced Plastic Composites Production

Dear Mr. Haberlein:

Thank you for the HAP emissions calculation dated August 18, 2003 that you submitted for the Xerxes Plant located in Lakeland, Florida.

Though paragraph 63.5799(c) of Subpart WWWW states "Existing facilities must initially perform this [HAP emissions] calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report;" section 63.5799 states that "You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations."

The initial notification dated May 30, 2003 that was submitted by Xerxes General Counsel, Craig D. Peterson, stated that "This facility produces large underground storage tanks from reinforced plastic composite materials. The production operation uses the open molding process and can emit over 100 tpy of styrene through ten vertical exhaust stacks." Since there was no mention of centrifugal casting or continuous lamination/casting operations in this notification, or in your additional information, I do not believe that this additional information was required.

If there are centrifugal casting or continuous lamination/casting operations performed at this facility, please send additional information as to whether or not the underground storage tanks meet the definition of "large parts" as defined in paragraph 63.5805(d)(2).

If you have any questions concerning this matter, please contact me at 850-921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,

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

c: Mr. Jerry Kissel, FDEP-SWD Office
Mr. Craig Peterson, Xerxes

ENGINEERING ENVIRONMENTAL

CONSULTING SERVICES

Robert A. Haberlein, Ph.D., QEP

robhab@erols.com

TWO FISK CIRCLE
ANNAPOLIS, MD 21401
(410) 268-7367
(410) 267-8174 fax

FIRST CLASS – CERTIFIED MAIL

August 18, 2003

Cindy Phillips, PE
Florida Department of Environmental Protection
Bureau of Air Regulation, MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 21 2003

BUREAU OF AIR REGULATION

RE: Composites MACT Calculation for Period April 2002 through March 2003

To whom it may concern:

I have been directed by Mr. Craig Peterson, General Counsel for the Xerxes Corporation, to provide you with some additional information regarding the initial MACT notification contained in his May 30, 2003 letter to your office.


Pursuant to the specific initial notification requirements contained in 40 CFR §63.5799(c), I have prepared and attached hereto a MACT compliance calculation for the period April 2002 through March 2003 for the Xerxes Corporation plant in Lakeland, Florida, which is also known as the Lakeland Plant.

This calculation utilizes the "HAP emissions averaging option" described in paragraph b. of § 63.5810. The HAP emission rate for each material/process combination listed in this calculation was obtained from the associated equation listed in Table 1 of Subpart WWWW to Part 63. The corresponding MACT limit for each material/process combination was obtained from Table 3 of Subpart WWWW to Part 63 for open molding operations. Operations at the Lakeland Plant were suspended on July 2001, so the calculation assumes typical material usages and processes at a similar Xerxes plant.

As shown, the plant-wide weighted average HAP emission rate is only 92.2% of the plant-wide weighted MACT limit, so the typical plant operation would comply with the Composite MACT requirements for open molding.

Please call me at (410) 268-7367 if you have any questions regarding this calculation.

Respectfully submitted,


Robert A. Haberlein, Ph.D., QEP

**Xerxes Lakeland Plant -
Initial Composites MACT Compliance Check for Typical Operations using § 63.5810 Option B HAP Emissions Averaging**

August 12, 2003

Operation	Product Code	Material Classification Type (per MACT category)	Monomer Range (% wt)	Monomer Content (% wt)	Percentage of Material Usage (% of total)	Application Method	MACT HAP Emission Limit (lb/ton)	MACT HAP Emission Rate (lb/ton)	Percent of MACT Limit (%)	Comments
UST assembly	UST resin	Resin - corrosion	NA	43%	5.0%	Manual (assembly)	123	140	113.8%	
UST lam	UST resin	Resin - corrosion	NA	43%	95.0%	Mech. Non-Atomized	112	102	91.1%	
					100.0%				92.2%	

Note: Operations at the Lakeland Plant were suspended on July 15, 2001, so this initial MACT check is based on typical operations at similar Xerxes plants.



May 30, 2003

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JUN 05 2003

Mr. Cindy Phillips, PE
Florida Department of Environmental Protection
Bureau of Air Regulation, MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

ATTN: Title V Compliance Program

Re: Notification of a Source Subject to Requirements Under 40 CFR Part 63 Subpart
WWW.National Emissions Standards for Hazardous Air Pollutants, Reinforced
Plastics Composites Production

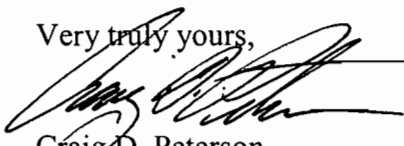
To Whom It May Concern:

On April 21, 2003 EPA promulgated MACT standards under section 112 of the Clean Air Act for certain sources engaged in production of reinforced plastics composites. 68 Fed. Reg. 19375. Section 63,5905 and Table 13 of the new regulations require that the owner of every existing source subject to these regulations must give initial notice to the Administrator or her delegate by August 19, 2003. The contents of that notice are specified in 40 CFR 63.9(b). See 68 Fed. Reg. 19413, 19428.

In accordance with these provisions, Xerxes is writing to give you the required information about such a source, as follows:

Name and address of owner or operator, see 40 CFR 63.9(b)(2)(i)	Xerxes Corporation 7901 Xerxes Avenue South Minneapolis, MN 55431
Physical location of source, see 40 CFR 63.9(b)(2)(ii)	Xerxes Corporation 3110 Reynolds Road Lakeland, FL 33803
Identification of relevant standard, see 40 CFR 63.9(b)(2)(iii)	40 CFR Part 63, Subpart WWW, as promulgated on April 21, 2003, 68 FR 19375
Compliance date, see 40 CFR 63.9(b)(2)(iii)	April 21, 2006
Brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutant emitted, see 40 CFR 63.9(b)(2)(iv)	This facility produces large underground storage tanks from reinforced plastic composite materials. The production operation uses the open molding process and can emit over 100 tpy of styrene through ten vertical exhaust stacks.
Is the source major or area, see 40 CFR 63.9(b)(2)(v)	The source is major.

Very truly yours,



Craig D. Peterson
General Counsel

C: SWO

CDP/bk



May 13, 2002

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MAY 14 2002

Sent VIA UPS Overnight Mail

Ms. Cindy Phillips, PE
Florida Department of Environmental Protection
Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

ATTN: 112(j) Program

RE: Section 112(j) Part 1 Title V Permit Revision Applications

On April 5, 2002, the Environmental Protection Agency published revisions in the Federal Register (FR 16591) to the final rule for 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants for Source Categories. These revisions affect the General Provisions and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j).

Xerxes Corporation owns a reinforced plastic composite manufacturing plant in Lakeland, Florida. At present, this plant is temporarily shutdown. However, when this plant is operational, it has the potential to be a major source of Hazardous Air Pollutants (HAPs) and may be subject to several source categories for which Section 112(d) standards have not been promulgated. Therefore, the Lakeland plant has the potential to be subject to the provisions of Section 112(j).

Sources subject to Section 112(j) must apply for a Title V (Part 70) permit or permit revision. The application process is a two-part process. Part 1 of the permit application requests basic information about the HAP sources. Part 2 of the application requests information to make the Maximum Achievable Control Technology (MACT) determination. Part 1 of the permit application must be submitted to the Florida Department of Environmental Protection and to the U.S. EPA Region IV office in Atlanta by May 15, 2002.

In order to comply with this requirement, a Part I application for the Xerxes Corporation plant in Lakeland, Florida is attached hereto.

Please contact me if you have any questions, or require any additional information on this matter.

Very truly yours,

Craig D. Peterson
General Counsel

CDP/bk
Attachments

Lake/EPA/Sect112TitleV.5/302(2)

Section 112(j) Part 1 Title V (MACT) Permit Revision Application

Name and address (physical location) of the installation:

**Xerxes Lakeland Plant
Xerxes Corporation
3110 Reynolds Road
Lakeland, FL 33803**

Brief description of the major source:

Reinforced Plastics Composites Production, including resin application, plastic coatings & adhesives

Identification of the potentially relevant section 112(j) emission standard subparts:

PPPP	Plastic Parts/Products (surface coating)
WWWW	Reinforced Plastics Composites Production

Identification of the types of emission points or emission units belonging to the subject source category:

**Emission Unit #001 - Seven non-atomizing applicator guns - Gun #1 to Gun #7
SEE Part 70 (Title V) Operating Permit Number 1050183-002-AV**

Identification of any affected sources for which a Section 112(g) (Section 9 Construction Permit) MACT determination has been made.

NONE

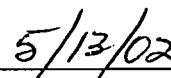
Certification of truth, accuracy and completeness by the Responsible Official.

I, do hereby certify under penalty of law that based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Responsible Official:



Ronald M. Bachmeier, Vice President of Xerxes Corporation



Date

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MAY 14 2002

BUREAU OF AIR REGULATION



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

May 16, 2002

Mr. Craig D. Peterson
General Counsel
Xerxes Corporation
7901 Xerxes Avenue South
Minneapolis, Minnesota 55431

Re: 12(j) Notification Information Submittal
Xerxes Lakeland Plant, Florida

Dear Mr. Peterson:

Thank you for submitting the referenced information in your letter received May 14, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to this information submittal as a "Section 112(j) Part 1 Title V (MACT) Permit Revision Application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

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

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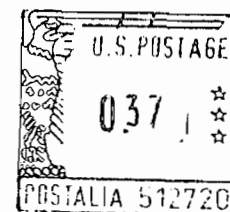
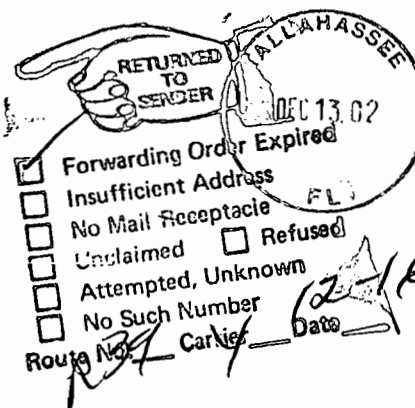
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2600 Blair Stone Rd
Tallahassee FL 32399-2400

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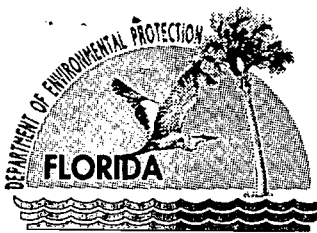
BUREAU OF AIR REGULATION

Ronald Bachmeier
Xerxes
3110 Reynolds Rd.
Lakeland, FL 33803



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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 13, 2002

Mr. Ronald Bachmeier
Xerxes
3110 Reynolds Road
Lakeland, FL 33803

Re: Proposed National Emission Standards for Hazardous Air Pollutants (NESHAP) -
Surface Coating of Plastic Parts and Products

Dear Mr. Bachmeier,

You indicated, in your recent 112(j) notification, that your facility may be subject to the upcoming NESHAP (40 CFR 63 Subpart PPPP) for Surface Coating of Plastic Parts and Products. You may be interested in knowing that on December 4, 2002, the USEPA published the proposed NESHAP for surface coatings of plastic parts and products in the Federal Register.

If you have any questions or concerns regarding the proposed standards, the USEPA is accepting comments until February 3, 2003. The proposed NESHAP, and a Fact Sheet explaining the proposed standards, may be accessed through the USEPA website. The Internet address is: <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Instructions explaining how to submit comments to the USEPA are included with the proposed NESHAP.

If you do not have access to the Internet, and would like to receive a paper copy of the proposed standards in the mail, please contact Mr. Bobby Bull at (813) 921-9585 or Robert.Bull@dep.state.fl.us.

Sincerely,

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

c: Jerry Kissel, Florida DEP, Southwest District

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