*** DRAFT PERMIT ***

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Reichhold, Inc.
425 South Pace Boulevard
Pensacola, Florida 32501

Authorized Representative:
Mr. Bill Torrence, Plant Manager

Air Permit No. 0330043-007-AC
Permit Expires: one-year permit

Pensacola Plant
Minor Source Air Construction Permit
300 HP Boiler No.10 Installation

This is the final air construction permit, which authorizes Reichhold, Inc., to install a new 300 HP Natural Gas Fired Boiler. The proposed work will be conducted at the Pensacola Plant, which is an existing Plastic Material and Synthetic Resins Facility (Standard Industrial Classification No. 2821). The facility is located in Escambia County at 425 South Pace Boulevard in Pensacola, Florida. The UTM coordinates are Zone 16, 476.4 km East, and 3363.9 km North. As noted in the Final Determination provided with this final permit, (no changes / only minor changes and clarifications) were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Pensacola, Florida

(DRAFT)

_____ _____

Rick Bradburn, Air Program Administrator (Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Bill Torrence, Reichhold, Inc.: bill.torrence@reichhold.com
Mr. Bruce E. McCall, Reichhold, Inc.: bruce.mccall@reichhold.com
Suzanne Thomas-Cole, P.E., AECOM: suzanne.thomas2@aecom.com
Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The Reichhold, Inc. facility produces a wide variety of synthetic resins that are used primarily by the coating and ink industries. The resins are produced in batch mode in chemical reactors. The criteria pollutants' potential-to-emit is below major thresholds. Hazardous air pollutants (HAP) have been reduced throughout the facility to get potential-to-emit HAP emissions below 25 tons per year.

The facility currently operates under a Federally Enforceable State Operating Permit (FESOP) to limit potential emissions to synthetic minor source status to achieve compliance with the MON MACT NESHAP. The installation of the proposed boiler will not affect the minor status of this facility.

Facility ID No. 0333043

ID No.	Emission Unit Description
016	Boiler No. 11
017	Boiler No. 12
047	Reactors
049	Heater/Furnace
051	Facility-Wide Fugitive
052	Storage Tanks
053	Bonding Paste Process

Note: Each of the existing boilers is fired on natural gas and has a maximum rated capacity of 33.5 million Btu per hour. Both boilers are allowed to operate concurrently in case of heavy demand, but are limited to no more than 400 hours per year of concurrent operation.

Proposed Project

This project proposes the installation of a new 300 HP Natural Gas Fired Boiler, to be identified as Boiler No. 10. The proposed new 300 HP boiler is manufactured by GBT Green Boiler Technologies, Model No. 300HP-105E-8102, and has a maximum rated heat input of 12.3 million BTU per hour. This project will add the following emissions unit.

Facility ID No. 0333043

ID No.	Emission Unit Description
054	Boiler No. No. 10

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northwest District Air Resource Management Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us.

3. Appendices: The following Appendices are attached as part of this permit:

    a. Appendix A. Citation Formats and Glossary of Common Terms;

    b. Appendix B. General Conditions;

    c. Appendix C. Common Conditions; and

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

8. Source Obligation:

    (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

    (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

    [Rule 62-212.400(12), F.A.C.]

NSPS Boiler No. 10

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
054	Boiler No. 10

This construction permit authorizes the installation of a 300 HP natural gas fired boiler (Boiler No. 10), manufactured by GBT Green Boiler Technologies, Model No. 300HP-105E-8102, with a maximum usage of 12.3 million Btu per hour.

The following specific conditions apply to the emissions unit listed above:

1. Previous Permits: This permit supplements all previously issued air construction and operation permits for this emissions unit. Except for the change noted below, the unit remains subject to the conditions of all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

2. New Equipment: Except for the change noted below, the new equipment authorized by this permit shall be subject to the same requirements, such as, but not limited to; emissions standards, recordkeeping, compliance testing and fuels limitations previously established for this emissions unit in all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

EQUIPMENT

3. 300 HP Boiler: The permittee is authorized to install one 300 HP Natural Gas Fired Boiler, manufactured by GTB Green Boiler Technologies, Model 300HP-105E-8102, with a maximum usage of 12.3 MBtu per hour, identified as Boiler No. 10 (EU 054). [Rule 62-4.160(2), and 62-213.440(1), F.A.C., and Application No. 0330043-007-AC]

PERFORMANCE RESTRICTIONS

4. Authorized Fuel: The boiler shall be fueled only by natural gas. [Rules 62-4.160(2), 62-296.406(2)&(3) (BACT for PM and SO_2) and 62-210.200(PTE), F.A.C., and Application No. 0330043-007-AC]

5. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

6. Emissions Standards:

   a. Visible Emissions – 20 percent opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent. [Application No. 0330043-007-AC and Rule 62-296.406(1), F.A.C.]

TESTING REQUIREMENTS

7. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for Pollutants. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

8. Compliance Tests: Emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at

the permitted maximum operating rate. Tests shall be conducted once per permit cycle, within 90 days prior to submission of the permit renewal application. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing. [Rule 62-297.310(7)(a)4., F.A.C.]

9. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

10. Test Methods: Required tests shall be performed in accordance with the following reference method.

9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rules 62-204.800 and 62-297.401, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, 62-297.100 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

12. Initial Written Notification: The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, no later than 30 days after such date. This notification shall include:

    a. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
    b. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

    [Rule 62-204.800(8)(b)4., F.A.C. and 40 CFR 60.7 and 60.48c(a)]

13. Fuel Supplier Certification: Fuel supplier certification shall include the following information:

    (a) The name of the supplier of the fuel;
    (b) The potential sulfur emissions rate or maximum potential sulfur emissions rate of the fuel in ng/J heat input; and
    (c) The method used to determine the potential sulfur emissions rate of the fuel.

    [Rule 62-204.800(8)(b)4., F.A.C. and 40 CFR 60.48c(f)]

14. Records of Fuel Amounts: Except as provided below, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

    (a) As an alternative to recording and maintaining records of the amount of each fuel combusted during each operating day, the owner or operator of an affected facility that combusts only natural gas may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

    (b) As an alternative to recording and maintaining records of the amount of each fuel combusted during each operating day, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil

meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO_2standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [Rule 62-204.800(8)(b)4., F.A.C., and 40 CFR 60.48c(g)]

15. Records Retention: All records required for this emissions unit shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. [Rule 62-204.800(8)(b)4., F.A.C., and 40 CFR 60.48c(i)]