



Department of Environmental Protection

FILE COPY

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

MAY 2, 1996

Brian Gebbia
Plant Manager
Air Products and Chemicals, Incorporated
4575 Highway 90 East
Pace, Florida 32571

Dear Mr. Gebbia:

This letter is intended to make administrative corrections to draft construction permit 1130004004AC for constructing a methanol crude storage tank.

By this letter draft permit 1130004004AC is amended as follows:

References to the "DME Compressor" in the description and Specific Conditions No. 5 and No. 8 are changed to "Compressor with nitrogen buffered packing".

All other Specific Conditions of this permit remain in effect. This letter shall be attached to and made part of draft permit 1130004004AC.

If you have any questions or comments, please contact Rick Prusa of this office at (904) 444-8364.

Sincerely,

A handwritten signature in black ink that reads "Ed K. Middleswart". The signature is stylized with a large, sweeping flourish at the end.

Ed K. Middleswart, P.E.
Air Program Administrator

EKM:rpr
cc: T. R. Knepper, P.E., Air Products



Department of Environmental Protection

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Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

ENTERED
MAY 21 1996

PERMITTEE:

Air Products and Chemicals, Inc.

AIRS I.D. Number: 1130004
Air Permit Number: 1130004004AC
Emission Units: 030, 031
Date of Issue: May 17, 1996
Expiration Date: May 17, 2001
County: Santa Rosa
Project: Methanol Crude Storage Tank

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Construction of a fixed roof Methanol Crude Storage Tank (TK-53101), surge control vessel, DME compressor, four sets of pumps, high pressure/low pressure filter cleanout system and associated piping, etc. Methanol emissions are controlled by a scrubber which reduces potential emissions from 527 tons per year to 27 tons per year. Methanol fugitive emissions from the DME compressor, four sets of pumps and associated piping, etceteras, are minimized.

Located at 4575 Highway 90 East, Pace, Santa Rosa County.

1130004004AC

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"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

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Air Products and Chemicals, Inc.

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SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Construction

2. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during the life of this permit. Projects beyond one year require annual status reports. [FAC Rule 62-4.030]

Operation

3. The maximum allowable operating rate is 45,315 (100% basis) pounds of methanol produced per hour. This is the operating rate at which compliance with standards shall be demonstrated. This allowable operating rate is a function of catalyst life which varies capacity up to 10%. [FAC Rule 62-4.070, FAC Rule 62-296.320(1)(a)]

4. The Methanol Crude Tank Scrubber may operate up to 8760 hours per year. [FAC Rule 62-4.070 and construction application]

5. A startup/shutdown/malfunction plan for the Methanol Crude Tank Scrubber, DME Compressor, High Pressure/Low Pressure Filters, Methanol Crude Tank, Extraction Column Seal Leg and Pumps will be prepared and compliance with the plan will be documented. Actions taken which are inconsistent with the startup/shutdown/malfunction plan must be reported within 2 working days with written follow-up provided within 7 working days. The plan shall be kept readily available for inspection and revisions to the plan will be maintained for 5 years. [FAC Rule 62-204.800(9) and 40 CFR63.6(e)]

6. Semiannual startup/shutdown/malfunction reports are required if any actions taken are inconsistent with the written plan. These reports are due 30 days after each calendar half year (Jan. 31 and July 31). As part of the required semiannual report, a description of maintenance activities planned for the next six months will be submitted. [FAC Rule 62-204.800(9), 40CFR63.10(d)(5) and 40CFR63.122(g)]

7. The methanol crude tank scrubber shall be designed to reduce inlet HAP emissions by 95%. Periods of planned routine maintenance of the control device when it does not meet the 95% emission reduction criteria shall be limited to 240 hours per year. Either a design evaluation or a performance test shall be performed to demonstrate compliance with the 95% emission reduction criteria and monitoring parameters will be identified and operating

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SPECIFIC CONDITIONS:

[7. (cont.'d)]

ranges for those parameters will be established to ensure that the scrubber operates at 95% efficiency. Records shall be kept of all monitored parameters, routine maintenance and planned routine maintenance including the day and time that the scrubber is started back up and complies with the 95% control efficiency requirement after each period of routine maintenance. [FAC Rule 62-204.800(9), 40CFR63.119(e)(1)&(3), 63.122(g), 63.120(d) and 63.123(f)]

8. The DME compressor shall be equipped with a seal system that includes a nitrogen barrier fluid system to prevent leakage of process fluid to the atmosphere. The compressor barrier fluid system shall be vented to the methanol crude tank scrubber. [FAC Rule 62-204.800(9), 40 CFR 63.164(a)&(h)]

9. Procedures will be established to ensure that the high pressure and low pressure filter system for clearing the equipment for mechanical work will be operated properly and these procedures will be incorporated into the startup/shutdown/malfunction plan. [FAC Rule 62-204.800(9), 40CFR63.105]

10. Methanol emissions from the methanol crude tank will be controlled to at least 95% efficiency. Periods of planned routine maintenance of the control device when it does not meet the 95% emission reduction criteria shall be limited to 240 hours per year. Initial Notifications, Implementation Plans, Notifications of Compliance, and Semiannual reports will be submitted if required under 40CFR Part 63. As part of the Notification of Compliance Status, the operating range for each monitored parameter will be submitted along with either a copy of the design evaluation or the performance test results. As part of the required semiannual report, a description of maintenance activities planned for the next six months will be submitted. Either a design evaluation or a performance test shall be performed to demonstrate compliance with the 95% emission reduction criteria and monitoring parameters will be identified and operating ranges for those parameters will be established to ensure that the scrubber operates at 95% efficiency. Readily accessible records shall be kept showing the dimension and capacity of the vessel. Records shall also, be kept of all monitored parameters, routine maintenance and planned routine maintenance including the day and time that the scrubber is started back up and complies with the 95% control efficiency requirement after each period of routine maintenance. [FAC Rule 62-204.800(9), 40CFR 63.119(a)(1), 63.119(e)(3), 63.122(a)(1)-(5), (b), (c)(1), (g), 63.120(d) and 63.123(f), 63.148]

11. Emissions from the extraction column seal leg will be vented to a control device designed with a control efficiency of at least 95%. The control device must be monitored to ensure proper operation. The closed vent system must be visually monitored annually for visible, audible, or olfactory indications of leaks. Bypass lines that could divert flow away from the control device shall be carsealed closed and the carseal monitored monthly to ensure that it stays closed. [FAC Rule 62-204.800(9), 40CFR63. 172(b), (e)-(j)]

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SPECIFIC CONDITIONS:

12. Pumps shall comply with leak detection and repair criteria set forth in 40CFR63.163 with phase I beginning July 24, 1995, Phase II beginning July 24, 1996, and Phase III beginning January 1998. Semi-annual reports shall be submitted in April and October of each year. [FAC Rule 62-204.800(9), 40CFR63.182]

13. No objectionable odors shall be allowed off plant property. If the Department determines the facility is emitting objectionable odors, the Permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not be limited to, dispersion modeling analysis, strategies to reduce odorous chemicals utilization, and modifications of manufacturing production cycles, manufacturing methods and/or plant exhaust systems. [FAC Rule 62-204.800(9), 62-296.320(2)]

Administrative

14. An annual operation report (DEP Form 62-210.990(5)) shall be submitted by March 1st of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District, Air Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370]

15. A major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V Annual Emissions Fee, Cashiers Office, Bureau of Finance and Accounting, P. O. Box 3070, Tallahassee, FL 32315-3070. [FAC Rule 17-213]

16. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents and submit DEP Form 62.210.900(1) for major sources and 62-210.900(2) for minor sources. The application, compliance test report if required and appropriate fee when required are to be submitted before the expiration of this construction permit and within 75 days after completion of construction if the permittee desires to continue operation. [FAC Rule 62-4.050 and 62-210.300]

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SPECIFIC CONDITIONS:

17. The permanent source identification numbers for these point sources are:

- 1130004030 Methanol Crude Storage Tank/Scrubber
- 1130004031 Methanol Crude Storage Tank Fugitives

Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source. [FAC Rule 62-297.570]

18. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

Issued this 17th day of May 1996.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION


 ED K. MIDDLESWART, P.E.
 Air Program Administrator

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

GENERAL CONDITIONS:

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

GENERAL CONDITIONS:

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.