

STATEMENT OF BASIS

Title V Air Operation Permit Renewal Permit No. 0310071-015-AV

APPLICANT

The applicant for this project is IFF Chemical Holdings Inc. The applicant's responsible official and mailing address are: Mr. Prasad Balakrishnan, IFF Chemical Holdings Inc., 2051 North Lane Avenue, Jacksonville, FL 32254.

FACILITY DESCRIPTION

This facility is a non-SOCMI (Synthetic Organic Chemical Manufacturing Industry) plant. The facility operations include a crude sulfate turpentine processing facility that uses the crude sulfate turpentine (CST) as a feedstock to produce variety of products which might include pinenes, polymer additives, flavorings, fragrances, pine oil, and oil of turpentine. The facility also consists of a hydrogen chloride gas production plant, and three steam boilers.

PROJECT DESCRIPTION

This permit is to renew Title V Air Operation Permit No. 0310071-012-AV.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received November 5, 2014
Notice of Intent to Issue Air Permit issued November 24, 2014
Public Notice Published [**DRAFT**]

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60 and 40 CFR 60, Subpart A, NSPS General Provisions.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to this facility.

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PROJECT REVIEW

This project renews Title V Air Operation Permit No. 0310071-012-AV and incorporates the conditions of construction permits 0310071-013-AC (issued previously), which added the requirements of 40 CFR 63, JJJJJ- National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, as well as engines regulation 40 CFR 63, ZZZZ- National Emissions Standards for Hazardous Air pollutants for Stationary Reciprocating Internal Combustion Engines and added two new fragrance products: Iso-E and Iso-Gamma that will be included on the Unregulated Emissions Unit List; and 0310071-016-AC (processed concurrently), which authorizes the firing of on-specification used oil in the No. 1 Boiler; and to make minor administrative changes.

The following changes were incorporated:

1. Addition of On-specification used oil as an authorized fuel for the No. 1 Boiler.
2. Addition of EU040 (Emergency Engines 1, 2 and 3)
3. Addition of conditions from 40 CFR 63 (NESHAP) Subparts ZZZZ and JJJJJ
4. Addition of production process of Iso-E and Iso-Gamma to the Unregulated Emissions Unit List
5. Update to the list of tanks in the Insignificant Emissions Unit List
6. Updates to facility-wide conditions, permitting and compliance authorities
7. Changes in permit formatting

CONCLUSION

This project renews Title V Air Operation Permit No. 0310071-012-AV, which was issued on June 21, 2010. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213 and 214. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawing(s), plans, and other documents on file with the Permitting Authority.