



Department of Environmental Protection

FILE COPY

Lawton Chiles
Governor



Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

D.E. Garrett, Jr.
Plant Manager
Arizona Chemical
Caller Box 2447
Panama City, FL 32402

NOVEMBER 5, 1996

EPA
Concerns:
1) no localized read-outs at equipment to
verify control room readings

Dear Mr. Garrett:

This is in response to your October 15, 1996 letter concerning several issues associated with the eight natural gas fired Dowtherm Boilers included in permit AO03-217664.

You requested changes in the individual heat inputs for the boilers, with an overall decrease in the total permitted operating rate; correction of an identification number; and, clarification of the applicability of the general description.

We agree with the requested changes, and this letter amends permit AO03-217664 issued August 20, 1992 and modified January 15, 1993 as follows:

Change the first paragraph of the General Description, page 1, as follows:

FROM:

Operation of eight Dowtherm boilers, fueled by natural gas. These boilers are:

<u>Identity</u>	<u>Heat Input</u> <u>Million Btu/Hour</u>
H-350	7.3
GD-31	4.2
150-13	8.8
Semi-Commercial	2.2
102-1	27.5
GD-21	11.1
GD-1	7.7
GD-370	6.8

TO:

Operation of eight Dowtherm boilers, fueled by natural gas. These boilers are:

<u>Identity</u>	<u>Heat Input</u> <u>(MMBtu/hr)</u>
H-350	5.0
GD-31	3.4
150-13	6.0
Semi-Commercial	2.2
102-1	28.8
GD-21	9.0
GD-1	12.6
GD-371	5.0

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

Change the identification of source 10PCY03000106 in specific condition 6 as follows:

FROM:

10PCY03000106 Heater GD-370

TO:

10PCY03000106 Heater GD-371

Please make the appropriate pen and ink changes to permit AO03-217664; and, attach a copy of this letter to the permit.

You asked for clarification of the heat input description in the cover letter. We assume you are referring to the general description on the first page of the permit. The general description is included in and a part of the permit; and, as a result is enforceable as a part of the permit. However, if discrepancies exist between the general description and any specific conditions, the requirements of the specific conditions would take precedence.

If you have any questions, please contact Andy Allen at (904) 444-8364.

Sincerely,

A handwritten signature in black ink that reads "Ed K. Middleswart" followed by a stylized star symbol.

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

EKM:bkc

cc: Richard Lee



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000101-04, 06-09
Permit/Certification Number: A003-217664
Date of Issue: August 20, 1992
Date of Modification: January 15, 1993
Expiration Date: August 1, 1997
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"W
Section/Township/Range: Parker/4S/14W
Project: Eight Dowtherm Boilers

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of eight Dowtherm boilers, fueled by natural gas. These boilers are:

<u>Identity</u>	<u>Heat Input Million Btu/Hour</u>
H-350	7.3
GD-31	4.2
150-13	8.8
Semi-Commercial	2.2
102-1	27.5
GD-21	11.1
GD-1	7.7
GD-370	6.8 2/

Particulate, sulfur dioxide, nitrogen oxides, carbon monoxide and volatile organic emissions are controlled by clean fuel and proper combustion control.

Located on Everitt Avenue, Panama City.

Specific Condition No. 4 requires submittal of permit renewal application by June 1, 1997.

Specific Condition No. 5 requires submittal of annual operations reports by March 1.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000101-04, 06-09
Permit/Certification Number: AO03-217664
Date of Issue: August 20, 1992
Date of Modification: January 19, 1993
Expiration Date: August 1, 1997

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. Visible emissions shall not exceed 10% opacity.
3. This source will be operated at its maximum permitted rate occasionally to allow the Department to determine compliance by inspection. Compliance shall be assumed if visible emissions are undetectable by Department inspections.

If visible emissions above 5% opacity are detectable by the Department inspection it shall constitute good reason to believe that the applicable emissions standard is being violated and the permittee shall conduct a visible emissions test to show compliance. The test shall be conducted in accordance with EPA method 9. Such test shall be conducted within 30 days of being notified of the applicability of this condition required in accordance with Florida Administrative code Rule 17-297.310.

4. An application to renew this permit shall be submitted prior to June 1, 1997.
5. An annual operation report [DER Form 17-1.202(6) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
6. The permanent source identification numbers for these point sources are:
10PCY03000101 Heater H-350
10PCY03000102 Heater GD-31
10PCY03000103 Heater 150-13
10PCY03000104 Heater Semi-Commercial
10PCY03000106 Heater GD-370
10PCY03000107 Heater 102-1
10PCY03000108 Heater GD-21
10PCY03000109 Heater GD-1

Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source.

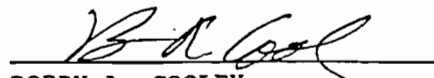
7. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours.

Expiration Date:

August 1, 1997

Issued this 15th day of JANUARY, 1993.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


BOBBY A. COOLEY
District Director



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000105
Permit/Certification Number: A003-245640
Date of Issue: March 14, 1994
Expiration Date: March 1, 1999
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"W
Project: Crude Tall Oil Plant

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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:

Operation of a crude tall oil plant. Black liquor soap is neutralized with sulfuric acid to yield crude tall oil. Emissions of hydrogen sulfide from the reactor, screen filter and decanter tanks are exhausted through a packed scrubber column and treated with white liquor from the adjoining paper mill. The used scrubber liquor is returned to the paper mill for recovery of chemicals. White liquor make-up rate and carbonation level of recycling white liquor are used as surrogate parameters to assure control of total reduced sulfur (TRS) emissions.

Located: Everitt Avenue, Panama City.

Specific Condition No. 8 requires TRS testing due before the end of November 1998.

Specific Condition No. 9 requires submittal of annual operating reports.

Specific Condition No. 13 requires submittal of permit renewal application by January 1, 1999.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000105

Permit/Certification Number: AO03-245640

Date of Issue: March 14, 1994

Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable operating rate is 6.0 tons of crude tall oil per hour. This is the operating rate at which compliance with standards shall be demonstrated. *Request Formula*
3. Emissions of TRS shall not exceed 0.05 pounds per ton of crude tall oil produced as a 12-hour average.
4. In accordance with FAC Rule 17-297.500(3)(d), the permittee has supplied evidence that compliance with the TRS emissions limit (specific condition 3) is assured if the following process parameters are continuously maintained:
 - A. Make up white liquor to the recirculating scrubber liquor shall not be less than four gallons per minute. This make up shall be maintained high enough to assure the carbonation level (specific condition 4B).
 - B. The percent carbonation (determined by test and calculation described in application attachment for permit AO03-163422 received March 1, 1989) shall not be greater than 75%.
5. Percent carbonation tests shall be conducted and the results logged every two hours. If results require white liquor make-up adjustment the percent carbonation shall be conducted every 15 minutes until stable results are assured. *Requested Logs*
6. Excess TRS emissions are deemed to have occurred if either or both of the surrogate parameter limits of specific conditions 4A and 4B are not adhered to. These excess TRS emissions instances shall be submitted to the Department as part of a Quarterly Report [per FAC Rule 17-297.500(4)] submitted prior to the 30th day following the end of each calendar quarter.
7. A log of surrogate parameter values and test results shall be maintained and shall be available for Department inspections.
8. TRS 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 in accordance with EPA method 16 or 16A. Such tests shall be conducted in 1998 before the end of November to be submitted with the application for renewal of this permit. More frequent tests may be required if Department inspections show a need for such tests. Surrogate parameters data shall be submitted as part of the compliance test results.

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the department.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000105

Permit/Certification Number: A003-245640

Date of Issue: March 14, 1994

Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

9. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

10. In accordance with F.A.C. Rule 17-213, 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 November 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 (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

11. All fugitive dust generated at this site shall be adequately controlled.
FAC 17-296.310(3)(a)

12. This source shall be operated in such a fashion so as to preclude objectionable odors. FAC 17-296.320(2)

13. An application to renew this permit shall be submitted prior to January 1, 1999.

14. The permanent source identification number for this point source is 10PCY03000105. Please cite this number on all test reports and other correspondence specific to this permitted point source.

15. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, 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.

Expiration Date:

Issued this 14th day of March,
1994.

March 1, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000110

Permit/Certification Number: AO03-217872

Date of Issue: September 1, 1992

Expiration Date: June 1, 1997

County: Bay

Latitude/Longitude: 30°08'40"N/85°37'05"W

Section/Township/Range: Parker/4S/14W

Project: Tall Oil Cooling Water Tower

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of a cooling water tower serving the tall oil plant, 3.44 million pounds of water per hour containing a maximum of 900 ppm of tall oil. The amount of tall oil in the water is controlled by gravity separation of the immiscible oils from a settling pond. Air emissions from the tower are controlled by 99.9% efficient drift elimination of mist carryover from the top of the tower.

Located on Everitt Avenue, Panama City.

Specific Condition No. 5 requires submittal of permit renewal application by June 1, 1997.



PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000110

Permit/Certification Number: A003-217872

Date of Issue: September 1, 1992

Expiration Date: June 1, 1997

SPECIFIC CONDITIONS:

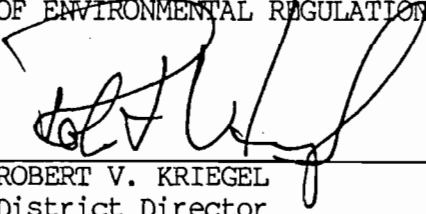
1. The attached General Conditions are part of this permit.
2. The gravity separation and mist eliminator shall be maintained and operated to control organic vapor emissions. Maintenance and operation logs shall be maintained and be available for Department inspection.
3. This source shall be operated in such a fashion so as to preclude objectionable odors.
4. This permit prohibits the discharge of liquid effluents or contaminated runoff from your holding pond or from your facility unless appropriately permitted or exempted in accordance with State rules and regulations.
5. An application to renew this permit shall be submitted prior to June 1, 1997.
6. The permanent source identification number for this point source is 10PCY03000110. Please cite this number on all test reports and other correspondence specific to this permitted point source.
7. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, 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.

Expiration date:

June 1, 1997

Issued this 1st day of Sept,
1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEDEL
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Robert Kriegel, Deputy Assistant Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000111

Permit/Certification Number: A003-186229

Date of Issue: OCT 2 1990

Expiration Date: October 1, 1995

County: Bay

Latitude/Longitude: 30°08'40"N/85°37'05"W

Section/Township/Range: Parker/4S/18W

Project: Soap Plant

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of a soap plant. Tall oil rosin (a mixture of C_{20} organic acids derived from crude tall oil) is saponified with caustic soda (NaOH) or potash (KOH). The rosin is heated to approximately 150°C to flow; the heat boils water from the caustic solution. The water vapor carries out a small quantity of soap. Emissions are not controlled.

Located: Everett Avenue, Panama City.

Specific Condition No. 16 requires submittal of an annual visible emissions test before the end of June.

Specific Condition No. 18 requires submittal of an application for permit renewal by August 1, 1995.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000111

Permit/Certification Number: A003-186229

Date of Issue: OCT 2 1990

Expiration Date: October 1, 1995

GENERAL CONDITIONS:

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.

SPECIFIC CONDITIONS:

15. Visible emissions shall not exceed 20% opacity under normal operating conditions.

16. Visible 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 in accordance with EPA method 9. Such tests shall be conducted once per year before the end of June. 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.

17. This source shall be operated in such a fashion so as to preclude objectionable odors.

18. An application to renew this permit shall be submitted prior to August 1, 1995.

19. The permanent source identification number for this point source is 10PCY03000111. Please cite this number on all test reports and other correspondence specific to this permitted point source.

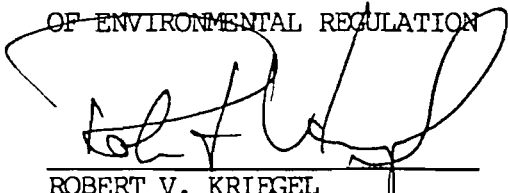
20. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours.

Expiration date:

October 1, 1995

Issued this 2d day of Oct, 1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEDEL
Deputy Assistant Secretary



Department of **FILE COPY** Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

June 10, 1996

D. E. Garrett, Jr.
Plant Manager
Arizona Chemical
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Garrett:

This is in response to your June 6, 1996 letter requesting several amendments to permit AO03-207641 allowing operation of two stripper units removing volatile organics from your Bay County plant's terpene resin unit wastewater stream (I.D. 0050001012). The requested amendments do not increase allowable emissions. We are curious as to whether alternatives exist to the continued operation of these strippers, since they seem to discharge significant quantities of BTEX as air emissions that would otherwise probably be removed from the wastewater by the wastewater treatment system.

Nevertheless, this letter approves the following amendments to permit AO03-207641 issued March 20, 1992 and changed by letters dated May 20, 1993 and November 16, 1993. These changes have been discussed with Richard Lee of your staff.

1. Specific Condition 2 is changed as follows.

From: The maximum allowable VOC emissions from this facility shall not exceed 19.9 pounds per hour, 5966.7 pounds per month, and 35.8 tons per year.

To: The maximum allowable VOC emissions from this facility shall not exceed 19.9 pounds per hour, and 35.8 tons per year.

2. Specific Condition 3 identifying acceptable ambient air concentrations is deleted, since it is not stipulated by rule.

3. Specific Condition 5 is changed as follows.

From: Concentrations in the wastewater feeding the stripping tower shall not exceed:

	<u>Typical</u>	<u>Maximum</u>
Benzene	0.3 mg/l	1.0 mg/l
Ethylbenzene	20.0 mg/l	60.0 mg/l
Toluene	0.7 mg/l	2.1 mg/l
Xylene	97 mg/l	291 mg/l
Total BTEX	118 mg/l (monthly average)	

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

Page Two
Amendment to A003-207641
June 10, 1996

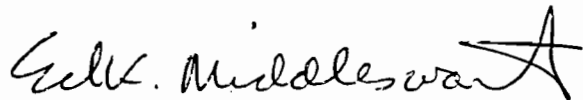
To: Concentrations in the wastewater feeding the stripping tower shall not exceed:

<u>Pollutant</u>	<u>Maximum Concentration</u>
Benzene	1 mg/l
TEX*	$[(\text{mg/l TEX} + 1) \times \text{gal/min} \times 0.0005] \leq 19.9 \text{ lb/hr}$

* (Toluene, Ethylbenzene, Xylene)

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

Sincerely,



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

EKM:bkc

cc: Richard Lee, Arizona Chemical (by facsimile)
DEP Division of Air Resources Management, Tallahassee

PCBO

MESSAGE CONFIRMATION

JUN-10-'96 MON 13:42

TERM ID: DEP PENSACOLA FL P-9999

TEL NO.: 904-444-8417

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
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Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

November 16, 1993

John Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your letter dated October 28, 1993 requesting amendment of your permit AO03-207641 by changing the allowable concentrations of toluene and xylene in the air stripper inlet wastewater, but keeping the same total VOC (BTEX) values.

This letter approves your request and amends permit AO03-207641 by making the following changes to Specific Condition No. 5.

Delete:

	<u>Typical</u>	<u>Maximum</u>
Toluene	0.7 mg/l	2.1 mg/l
Xylene	97.0 mg/l	291.0 mg/l

Insert:

	<u>Typical</u>	<u>Maximum</u>
Toluene	0.7 mg/l	5.0 mg/l
Xylene	97.0 mg/l	288 mg/l

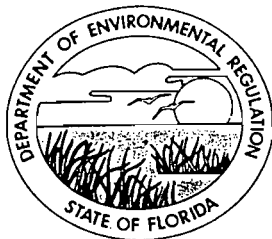
A copy of this letter shall be attached to and made a part of permit AO03-207641.

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

Sincerely,


Bobby A. Cooley
District Director

BAC:bkc



Florida Department of Environmental Regulation

Northwest District

160 Governmental Center

Pensacola, Florida 32501-5794

Lawton Chiles, Governor

May 20, 1993

Mr. John T. Trouts
Plant Manager
Arizona Chemical Company, Incorporated
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your letter of April 23. We concur with your request to take daily grab samples instead of weekly composite samples for concentrations of benzene, ethyl benzene, toluene and xylene. By this letter, permit A003-207641 Specific Condition No. 8 is changed to:

8. Benzene, ethyl benzene, toluene and xylene wastewater concentration 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 in accordance with EPA method 602 as described in the EPA manual 600/4-82-057. The permittee shall collect eight consecutive daily grab samples during each quarter. Results shall be submitted to the Department no later than 30 days after the end of the quarter.

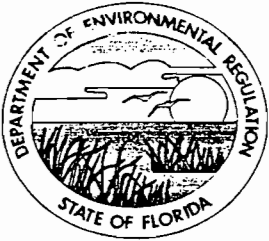
This letter shall be attached to and made a part of permit A003-207641.

Sincerely,

Bobby A. Cooley
District Director

BAC:rpc

cc: DER Panama City Branch Office



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 9, 1992

Mr. John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your June 8 letter requesting our written concurrence with your proposal to operate the two air strippers in series and your contention that this mode of operation will not affect permitted air emissions. We concur and acknowledge that this change is reasonable to assure stripper effluent quality.

If you have any questions or comments please contact me at (904) 436-8364.

Sincerely,

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

EKM:emc



Florida Department of Environmental Regulation

Northwest District

160 Governmental Center

Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

*Air
Stripper*

PERMITTEE:

Arizona Chemicals Company

I.D. Number: 10PCY03000112

Permit/Certification Number: AO03-207641

Date of Issue: March 20, 1992

Expiration Date: March 1, 1997

County: Bay

Latitude/Longitude: 30°08'40"N/85°37'05"W

Section/Township/Range: Parker/4S/14W

Project: Two Air Strippers

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of two air stripper units (one is backup). The air strippers remove volatile organics from wastewater discharged from the terpene resin unit. Volatile organics (benzene, toluene, ethyl benzene, and xylenes) are released uncontrolled at an allowed rate of 35.8 tons per year.

Located at the south end of Everitt Avenue in Panama City.

Specific Condition No. 7 requires annual visible emissions tests due before the end of November.

Specific Condition No. 8 requires quarterly wastewater testing and submittal of results no later than 30 days after the end of the quarter.

Specific Condition No. 9 requires submittal of annual operations reports.

Specific Condition No. 10 requires submittal of permit renewal application by January 1, 1997.

PERMITTEE:

Arizona Chemicals Company

I.D. Number: 10PCY03000112

Permit/Certification Number: AO03-207641

Date of Issue: March 20, 1992

Expiration Date: March 1, 1997

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable VOC emissions from this facility shall not exceed 19.9 pounds per hour, 5966.7 pounds per month and 35.8 tons per year.
3. The following pollutants as predicted acceptable ambient air concentrations (AAC) shall not be exceeded:

Pollutant	AAC (ug/m ³)		Annual
	8 hrs	24 hrs	
Benzene	30	7.1	.12
Ethylbenzene	4350	1036	—
Toluene	--	890	2000
Xylene	4350	1036	300

4. Visible emissions shall not exceed 20% opacity.
5. Concentration in the wastewater feeding the stripping tower shall not exceed:

	Typical	Maximum
Benzene	0.3 mg/l	1.0 mg/l
Ethylbenzene	20.0 mg/l	60.0 mg/l
Toluene	0.7 mg/l	2.1 mg/l
Xylene	97.0 mg/l	291.0 mg/l
Total BETX Conc.	118.0 mg/l (monthly average)	

6. Maximum influent to the air stripper column shall not exceed 130 GPM (monthly average) on a dry weather basis. A peak operational flow of 158 GPM (24-hour maximum) shall not be exceeded. The permittee shall check the flow rate to the column (stripper) at least once during each normal business day that the system is in operation.
7. Visible 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 in accordance with EPA method 9. Such tests shall be conducted once per year before the end of November. 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.

PERMITTEE:

Arizona Chemicals Company

I.D. Number: 10PCY03000112

Permit/Certification Number: A003-207641

Date of Issue: March 20, 1992

Expiration Date: March 1, 1997

SPECIFIC CONDITIONS:

8. Benzene, ethylbenzene, toluene and xylene wastewater concentration 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 in accordance with EPA method 602 as described in the EPA manual 600/4-82-057. The permittee shall collect a one-week composite sample during each quarter. Results shall be submitted to the Department no later than 30 days after the end of the quarter.

9. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals. These reports shall include the following: maximum quarterly and annual average influent concentration (mg/l); maximum quarterly and annual average effluent concentration (mg/l); stripping factor; maximum daily and annual average influent flow rate (GPM); calculated maximum 24-hour air impact concentrations; maximum air flow rate (CFM); and, annual hours of operation, etc.

Compliance with the acceptable ambient concentrations shall be demonstrated based on calculations certified by a Professional Engineer registered in Florida, using actual operating conditions. Submit these calculations with the Annual Operating Report. Determination of the ambient concentrations for organic compounds shall be determined by Department approved dispersion modeling.

10. An application to renew this permit shall be submitted prior to January 1, 1997.

11. The permanent source identification number for this point source is 10PCY03000112. Please cite this number on all test reports and other correspondence specific to this permitted point source.

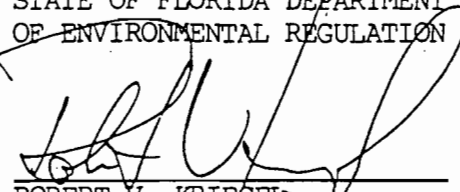
12. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours.

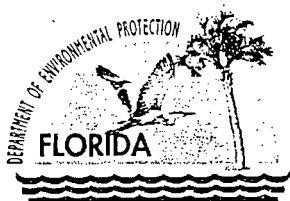
Expiration date:

March 1, 1997

Issued this 20th day of March, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
District Director



Department of Environmental Protection

F
Committed To ARMS
ASA

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

0050001-002-A0

PERMITTEE:

Arizona Chemical Company

I.D. Number: 0050001017
Permit/Certification Number: A003-268035
Date of Issue: September 18, 1995
Expiration Date: July 31, 2000
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"W
Project: Operation of Rosin Treater System

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:

Operation of a rosin treater system identified as the G-380 Rosin Treater. Volatile organic compound (VOC) emissions are controlled by a by-product condenser using tall oil fatty acid (TOFA) in direct contact with emissions. HAP emissions are controlled by an additional scrubber using a bleach solution operated when hypo-phosphorous acid is used in the rosin treating process.

Operation of this source shall be consistent with the operation permit application dated March 17, 1995, additional information provided May 30, 1995, and construction permit AC03-232460.

Located at One Everitt Avenue, Panama City

PERMITTEE:

Arizona Chemical Company

I.D. Number: 0050001017

Permit/Certification Number: AO03-268035

Date of Issue: September 18, 1995

Expiration Date: July 31, 2000

SPECIFIC CONDITIONS:

General

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

Operation

2. The maximum allowable operating rate is 80,000 pound per batch raw materials (Tall oil rosin, Polyol, catalysts, additive and TOFA). This is the operating rate at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department. (FAC Rule 62-4.070)

3. The maximum hours of operation are unlimited. (Construction permit application dated June 4, 1993)

4. The Permittee shall maintain a by-product condenser flow rate greater than 20 pounds/minute of TOFA during steam sparging. Records of the flow rate shall be kept and be available for Department inspection. The TOFA flow rate shall be a surrogate compliance parameter for VOC emissions. (Construction permit AC03-232460, FAC Rule 62-4.070)

5. The Permittee shall maintain a scrubber bleach flow rate greater than an equivalent of 0.375 pounds per minute of 100% sodium hypochlorite (NaOCl) commencing with the addition of hypo-phosphorous acid to the batch, and continuing for three hours after acid addition is ended. Records of scrubber bleach concentration, flow rate, and hours of operation shall be kept and be available for Department inspection.

Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>
VOC	62-296.320	9.29 lbs/hr (Avg./batch); 39 TPY

PERMITTEE:

Arizona Chemical Company

I.D. Number: 0050001017

Permit/Certification Number: AO03-268035

Date of Issue: September 18, 1995

Expiration Date: July 31, 2000

SPECIFIC CONDITIONS:

7. The Permittee shall maintain a record available for Department inspection identifying raw materials, emission factors, and emissions of VOCs and HAPs by batch and cumulative totals. (FAC Rule 62-4.070)

8. This source shall be operated in such a fashion so as to preclude objectionable odors. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to FAC Rule 62-296.200(123).

If the Department determines objectionable odors are being emitted from this facility, the Permittee shall submit within 45 days of receipt of written notification from the Department an odor remediation plan. The plan shall include, but is not limited to, the following:

1. Dispersion modeling analysis to show compliance with ambient acceptable odor threshold value(s).

2. Strategies to reduce odorous chemical utilization or emissions.

3. Modification of manufacturing production cycles.

4. Modifications of manufacturing methods.

5. Modifications of plant exhaust systems.

(FAC Rule 62-296.320(2))

Testing

9. The Permittee shall provide information verifying the applicability of the emission factors with the application for a an operation permit as required by specific condition 12.

Administrative

10. An annual operation report (DEP Form 62-210.900(5)) shall be submitted by March 1st of each year. A copy of the form and instructions for completing the form may be obtained from the Department of Environmental Protection, Northwest District, Air Resources Management Office, (904) 444-8364. (FAC Rule 62-210.370)

PERMITTEE:

Arizona Chemical Company

I.D. Number: 0050001017

Permit/Certification Number: A003-268035

Date of Issue: September 18, 1995

Expiration Date: July 31, 2000

SPECIFIC CONDITIONS:

11. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(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 (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

12. An application to renew this permit shall be submitted as required for a Title V permit (FAC Rule 62-210).

13. The permanent identification number for this emission unit is 0050001017. Please cite this number on all test reports and other correspondence specific to this permitted emission unit. (FAC Rule 62-297.570)

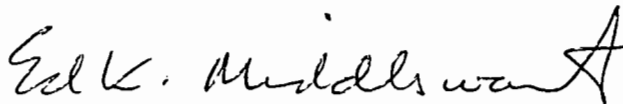
14. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 872-4375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

Expiration Date:

Issued this 18th day of Sept, 1995.

July 31, 2000

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
November 23, 1994

Virginia B. Wetherell
Secretary

John Trouts
Plant Manager
Arizona Chemical company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your November 11, 1994 letter requesting that the expiration dates for permits AC03-232460 (G380 Rosin Treater, I.D. 10PCY03000117) and AC03-246523 (Rosin Ester Flaker Belt Dust Collection System, I.D. 10PCY03000119) be extended to July 1, 1995. You advised this would allow completion of phosphine emissions testing for the rosin treater, and allow concurrent visible emissions testing on the dust collector.

This letter approves your request, and extends the expiration dates of the referenced permits to July 1, 1995. A copy of this letter should be attached to both permits.

We have not received the schedule requested in our November 7, 1994 letter outlining how Arizona Chemical will quantify emissions from the rosin treater. Additionally, please note that specific condition 2 of both permits requires notice of completion of construction; and specific condition 9 of permit AC03-246523 for the dust collection system requires VE testing within thirty days of completion of construction.

If you have any questions, please contact Bob Kriegel of this office at (904) 444-8364.

Sincerely,


Bobby A. Cooley
District Director

BAC:bkc

cc: DEP Division of Air Resources Management, Tallahassee
DEP Northwest District Branch Office, Panama City

F



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

May 26, 1994

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your April 6, 1994 letter advising us that Arizona Chemical believes no additional testing for VOCs or phosphine should be necessary to satisfy specific condition 7 of permit AC03-232460, for the construction of the G-380 Rosin Treater system.

We agree with your conclusion concerning the need for additional VOC testing. Scaling up the results of other similar reactors will provide emission estimates that are acceptable to us.

However, we do not agree that no additional testing is appropriate concerning phosphine emissions. Phosphine is a Hazardous Air Pollutant, and is a relatively toxic substance. Industrial spot checks with Draeger tubes do not confirm the absence of phosphine to acceptable ambient levels due to the limited detection levels of the Draeger tubes. As such, please proceed with the plan required by specific condition 7 of permit AC03-232480. Although the plan is now overdue, we will consider it timely submitted if it is provided by June 30, 1994, and any subsequent monitoring information is provided with the operation permit application required by specific condition 9 of permit AC03-232480.

If you have any questions, please contact Andy Allen at (904) 444-8364.

Sincerely,

A handwritten signature in cursive script, reading "Ed K. Middleswart".

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

EKM:bkc



Lawton Chiles
Governor

Florida Department of Environmental Protection

ENTERED

OCT 20 1993

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000117
Permit/Certification Number: AC03-232460
Date of Issue: October 13, 1993
Expiration Date: December 31, 1994
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"W
Project: Rosin Treater System

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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 8,000 gallon rosin treater system identified as G-380. Volatile organic compound (VOC) emissions are controlled by the in line operation of a by-product condenser using tall oil fatty acid as a scrubbing liquid, and a scrubber using a bleach solution as a scrubbing solution. Approximately 30 tons/year of light VOCs (propane, isobutane, ethylene) pass through the scrubber.

Located at Everitt Avenue, Panama City.

Specific Condition No. 2 requires notice of completion of construction and testing.

Specific Condition Nos. 5 and 6 establish surrogate control parameters for the condenser and scrubber and require recordkeeping.

Specific Condition No. 7 requires the development of a monitoring plan.

Specific Condition No. 8 requires monitoring.

Specific Condition No. 9 requires submission of an application for an operation permit within 75 days of completion of construction.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000117

Permit/Certification Number: AC03-232460

Date of Issue: October 13, 1993

Expiration Date: December 31, 1994

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The Department shall be notified within 15 days after completion of construction and prior to testing to allow witnessing of tests.
3. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction that affect air emissions.
4. The maximum estimated emission rate for volatile organic compounds is 30 tons/year. Demonstration of compliance with this requirement shall be made in accordance with Specific Condition No. 7 of this permit.
5. The condenser flow rate shall be controlled to serve as a VOC surrogate control parameter. The scrubber fluid flow rate shall be maintained above a minimum of 20 pounds per minute of tall oil fatty acid (TOFA) during steam sparging. Records of the condenser fluid flow shall be kept and be available during Department inspections.
6. The scrubber bleach flow rate shall be controlled to serve as a surrogate control parameter for phosphine emissions. The scrubber bleach flow rate shall be maintained above an equivalent of 0.375 pounds per minute of 100% sodium hypochlorite (NaOCl). Records of the scrubber bleach concentration and flow rate shall be kept and be available during Department inspections.
7. The permittee shall develop and submit a test plan for the department's approval within 180 days of issuance of this permit. The test plan shall include procedures to identify and quantify scrubber emissions and shall review analytical methods, sample locations, number of samples, etc. However, the permittee may use any previously existing data to demonstrate that additional testing is not necessary. Additionally, the permittee may use emission factors to quantify emissions.
8. Tests for phosphine emissions may be required to provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. If so, tests shall be conducted in accordance with the test plan required by condition 7 above. Such tests shall be scheduled within 90 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing.
9. The applicant shall retain a professional engineer registered in the State of Florida for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. A Certificate of Completion [Form DEP 17-1.202(3) enclosed] shall be submitted with the compliance test results and appropriate fee as application for an operation permit. These are to be submitted within 75 days after completion of construction. The permittee shall obtain an operating permit for this source before the expiration of this construction permit if the permittee desires to continue operation.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000117

Permit/Certification Number: AC03-232460

Date of Issue: October 13, 1993

Expiration Date: December 31, 1994

SPECIFIC CONDITIONS:

11. This source shall be operated in such a fashion so as to preclude objectionable odors.

12. The permanent source identification number for this point source is 10PCY03000117. Please cite this number on all test reports and other correspondence specific to this permitted point source.

13. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, 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.

Expiration Date:

Issued this 13th day of October,
1993.

December 31, 1994

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

July 1, 1994

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your letter dated June 23, 1994 regarding tray versus packed column scrubbers on your Rosin Treater Systems G-350 and G-360, permit AO03-218132, and Rosin Treater System G-370, permit AO03-223787.

By this letter, permits AO03-218132 and AO03-223787 are amended by replacing the wording "packed scrubber" and "packed column scrubber" with the wording "tray scrubber" in the process description of each permit.

All specific conditions of each permit remain in effect.

This letter shall be attached to and made a part of permits AO03-218132 and AO03-223787.

Sincerely,

Ed K. Mudders

for

Bobby A. Cooley
District Director

BAC:rpc

cc: Richard Lee
DEP Panama City Branch Office

F



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

ENTERED

MAY 31 1994
Virginia Wetherell
Secretary

May 27, 1994

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your letter dated May 11, 1994 regarding Rosin Treater System G-370, permit A003-223787. The letter requested that the aforementioned permit be modified to include production of product XR-4083, which has the potential to emit 6.5 pounds per batch of methyl iodide, or a maximum potential of 1.2 tons per year.

By this letter, permit A003-223787 is amended as follows. The description is changed to:

Operation of a rosin treater system. The system is identified as G-370. Volatile organic compound (VOC) emissions are controlled by a packed scrubber using tall oil fatty acid as a recycled scrubbing liquid. A minimum flow rate of 20 pounds per minute is maintained. Light VOCs (propane, butane, ethylene) pass through the scrubber totaling approximately 30 tons per year. When making product XR-4083, there is a potential to emit 6.5 pounds per batch or 1.2 tons per year of methyl iodide.

All specific conditions remain applicable.

This letter shall be attached to and made a part of permit A003-223787.

Sincerely,

A handwritten signature in cursive script, reading "Bobby A. Cooley".
Bobby A. Cooley
District Director

BAC:rpc

cc: DEP Panama City Branch Office



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

March 2, 1994

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to a letter from C. E. Johnson regarding Rosin Treater System G-370, permit AO03-223787. The letter requested permission to test a new product which emits methyl iodide up to 6.5 pounds per batch.

Toxics modeling using TSCREEN showed methyl iodide emissions effecting ambient levels well below the reference concentrations documented in the Air Toxics Working List.

By this letter, you are permitted to run two test batches of product XR-4083, emitting methyl iodide on Rosin Treater System G-370, permit AO03-223787.

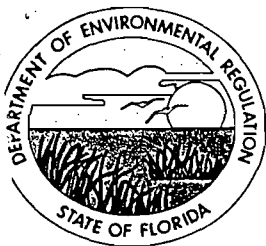
All specific conditions of the permit remain in effect.

Sincerely,

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

EKM:rpc

cc: C. E. Johnson
DEP Panama City Branch Office



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000116

Permit/Certification Number: AO03-223787

Date of Issue: January 15, 1993

Expiration Date: January 1, 1998

County: Bay

Latitude/Longitude: 30°08'40"N/85°37'05"W

Section/Township/Range: Parker/4S/14W

Project: Rosin Treater System

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of a rosin treater system. The system is identified as G-370. Volatile organic compound (VOC) emissions are controlled by a packed scrubber using tall oil fatty acid as a recycled scrubbing liquid. A minimum flow rate of 20 pounds per minute is maintained. Light VOCs (propane, butane, ethylene) pass through the scrubber totaling approximately 30 tons per year.

Located at Everitt Avenue, Panama City.

Specific Condition No. 2 requires records of scrubber fluid flow to be kept and be available for Department inspection.

Specific Condition No. 5 requires submittal of annual operation reports.

Specific Condition No. 6 requires submittal of permit renewal application by November 1, 1997.



PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000116

Permit/Certification Number: AO03-223787

Date of Issue: January 15, 1993

Expiration Date: January 1, 1998

SPECIFIC CONDITIONS:

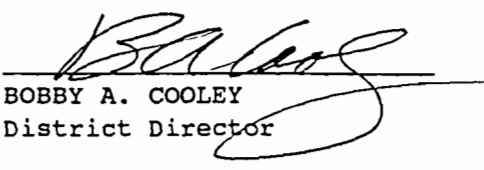
1. The attached General Conditions are part of this permit.
2. Scrubber fluid flow rate shall be controlled to serve as a VOC surrogate control parameter. The scrubber fluid flow rate shall be maintained above a minimum of 20 pounds per minute of tall oil fatty acid (TOFA). Records of the scrubber fluid flow observed once per operator shift shall be kept and be available for Department inspections.
3. This permit prohibits the discharge of liquid effluents or contaminated run-off from your holding pond or from your facility unless appropriately permitted or exempted in accordance with State rules and regulations.
4. This source shall be operated in such a fashion so as to preclude objectionable odors.
5. An annual operation report [DER Form 17-1.202(6) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
6. An application to renew this permit shall be submitted prior to November 1, 1997.
7. The permanent source identification number for this point source is 10PCY03000116. Please cite this number on all test reports and other correspondence specific to this permitted point source.
8. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, 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.

Expiration Date:

January 1, 1998

Issued this 15th day of January, 1993.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


BOBBY A. COOLEY
District Director



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO : Bobby A. Cooley, P.E.
THROUGH: Ed K. Middleswart, P.E. *Edm. 114*
FROM : Andy Allen, R. J. Prusa *RJP*
DATE : January 8, 1993
SUBJECT: Evaluation Summary for AO03-223787

We recommend issuing an initial operation permit to Arizona Chemical Company to operate a rosin treater system (G-370). This source was previously permitted under construction permit AC03-206270. Construction is complete.

Process Description Operation of a rosin treater system identified as G-370.

Pollution Control Equipment Volatile organic compound (VOC) emissions are controlled by a packed scrubber using tall oil fatty acid as a recycled scrubbing liquid.

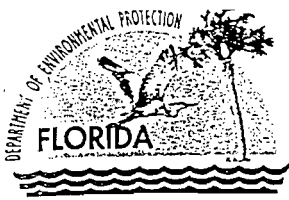
Environmental Impact Properly operated, this source emits 6.85 lb/hr VOC emissions comprised of lighter VOCs (propane, butane, ethylene) based on the construction permit application.

Applicable Rules & Regulations This source is regulated in accordance with FAC Rule 17-296.320 (17-2.620), which requires known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Scrubber fluid flow controlled to a minimum of 20 pounds per minute serve as a VOC emissions surrogate parameter.

Compliance Monitoring Compliance is assured by maintaining a minimum scrubber fluid flow rate of 20 lb/min.

Compliance History Records submitted from a typical batch run show the scrubber fluid flow rate averaging approximately 80 lb/min.

RJP:rpc



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

July 1, 1994

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your letter dated June 23, 1994 regarding tray versus packed column scrubbers on your Rosin Treater Systems G-350 and G-360, permit A003-218132, and Rosin Treater System G-370, permit A003-223787.

By this letter, permits A003-218132 and A003-223787 are amended by replacing the wording "packed scrubber" and "packed column scrubber" with the wording "tray scrubber" in the process description of each permit.

All specific conditions of each permit remain in effect.

This letter shall be attached to and made a part of permits A003-218132 and A003-223787.

Sincerely,

for Bobby A. Cooley
District Director

BAC:rpc

cc: Richard Lee
DEP Panama City Branch Office



Florida Department of Environmental Regulation

Northwest District

160 Governmental Center

Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000113

Permit/Certification Number: A003-218132

Date of Issue: October 21, 1992

Expiration Date: October 1, 1997

County: Bay

Latitude/Longitude: 30°08'40"N/85°37'05"W

Section/Township/Range: Parker/4S/14W

Project: Three Rosin Treater Systems

This permit is issued under the provisions of Section 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of three rosin treater systems. The systems are:

<u>System ID</u>	<u>Building</u>
MC3, 1, 1A, 21 & 21A	4
G350	12
G360	12A

Volatile organic emissions from each treater system are controlled by a packed column scrubber using tall oil fatty acid as a recycled scrubbing liquid. Light VOCs (propane, butane, ethylene) pass through the scrubber.

Located: Everitt Avenue, Panama City.

Specific Condition No. 3 requires VOCs tests due in 1993 before the end of October.

Specific Condition No. 6 requires submittal of annual operation reports.

Specific Condition No. 7 requires submittal of permit renewal application by August 1, 1997.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000113

Permit/Certification Number: A003-218132

Date of Issue: October 21, 1992

Expiration Date: October 1, 1997

SPECIFIC CONDITIONS:


1. The attached General Conditions are part of this permit.
2. The scrubber fluid flow rate for each rosin treater shall be maintained above a minimum of 90 gallons per hour. Records of the scrubber fluid flow observed once per operator shift shall be kept and be available for Department inspections.
3. Volatile organic compound 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 in accordance with EPA Method 18, 25, 25A or 25B, for each rosin treater system. Such tests shall be conducted in 1993 before the end of October. 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.
4. This permit prohibits the discharge of liquid effluents or contaminated runoff from your holding pond or from your facility unless appropriately permitted or exempted in accordance with State rules and regulations.
5. This source shall be operated in such a fashion so as to preclude objectionable odors.
6. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
7. An application to renew this permit shall be submitted prior to August 1, 1997.
8. The permanent source identification number for this point source is 10PCY03000113. Please cite this number on all test results and correspondence.
9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 872-4375, 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) 436-8364 during normal working hours.

Expiration date:

October 1, 1997

Issued this 21ST day of October, 1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


BOBBY A. COOLEY
Acting District Director



Lawton Chiles
Governor

Florida Department of Environmental Protection

MAY 11 1994

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000115
Permit/Certification Number: AO03-247802
Date of Issue: May 5, 1994
Expiration Date: March 31, 1999
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"N
Project: Boiler No. 2

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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:

Operation of Boiler No. 2 with an operating rate of 125,000 pounds of steam produced per hour with a heat input of 175 MMBtu/hour. The boiler is a Combustion Engineering Model A - Type #35-A13 with three burners and is fueled by natural gas, and tall oil and terpene by-products. The terpene burn material is a hazardous waste. Particulate emissions are controlled by operation of the boiler, and filtration of the tall oil pitch to minimize ash content. Sulfur dioxide emissions are controlled by the low sulfur content of the fuels. Nitrogen oxides emissions are controlled by the use of low NO_x burners and low excess air.

Operation of this source shall be consistent with the operation permit application dated March 23, 1994.

Located at Everitt Avenue, Panama City.

Specific Condition No. 2 establishes the maximum allowable operating and testing rates.

Specific Condition No. 6 establishes the maximum allowable emission rates.

Specific Conditions Nos. 8 and 9 establish compliance testing requirements.

Specific Condition No. 10 requires submission of an annual operation report.

Specific Condition No. 11 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 12 requires submission of a renewal permit application as required for a Title V facility.

*Terpene Sample
taken at 3:40
(Terpene Burn Material)*

*Tall Oil Sample taken
(Filtered Pitch)
at 2:42 pm 9/18/97*

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000115

Permit/Certification Number: A003-247802

Date of Issue: May 5, 1994

Expiration Date: March 31, 1999

SPECIFIC CONDITIONS:

GENERAL

1. The attached General Conditions are part of this permit (FAC Rule 17-4.160).

OPERATION

2. The maximum allowable operating rate is 125,000 pounds of steam produced per hour with a maximum heat input of 175 MMBtu/hour. This is the operating rate at which compliance with standards shall be demonstrated. Additionally, the rate of use of both tall pitch and pitch ash content during the compliance test shall be no less than 90% of the desired maximum allowable usage rate. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department. (FAC Rule 17-4.070)

3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. (Application dated March 14, 1994)

4. This permit incorporates all applicable requirements of the original BACT determination dated February 4, 1980 associated with permit AC03-24383. [FAC Rule 17-212.400(6)].

5. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections. (FAC Rule 17-297.345)

EMISSIONS

6. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>
PM	BACT	0.10 lbs/MMBtu heat input
VE	BACT	20% opacity except for up to two minutes/hour at not more than 40% opacity
NO ₂	BACT	0.30 lbs/MMBtu heat input
SO ₂	BACT	0.80 lbs/MMBtu heat input

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000115

Permit/Certification Number: AO03-247802

Date of Issue: May 5, 1994

Expiration Date: March 31, 1999

SPECIFIC CONDITIONS:

7. This source shall be operated in such a fashion so as to preclude objectionable odors. [FAC Rule 17-296.320(2)]

TESTING

8. Emissions tests for the following pollutants shall be performed between September 1 and October 31, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>	<u>Reference</u>
PM	annually	EPA method 5	FAC Rule 17-297
VE	annually	DEP method 9	"
NO _x	once, 1998	EPA method 7E	"
SO _x	annually	fuels analysis	"

The VE test shall be for a duration of 60 minutes and shall be conducted during one of the P.M. test runs. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2).

9. Each fuel, rate of use, and sulfur content during compliance testing shall be identified and included in the test report as well as calculated SO₂ emissions. Additionally, the ash content of the pitch shall be identified and included in the test report.

ADMINISTRATIVE

10. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals (FAC Rule 17-210.370) .

11. In accordance with F.A.C. Rule 17-213, 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 (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000115

Permit/Certification Number: A003-247802

Date of Issue: May 5, 1994

Expiration Date: March 31, 1999

SPECIFIC CONDITIONS:

12. An application to renew this permit shall be submitted as required for a Title V permit (FAC Rule 17-210).

13. The permanent source identification number for this point source is 10PCY03000115. Please cite this number on all test reports and other correspondence specific to this permitted point source. (FAC Rule 17-297.570)

14. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 444-8300 during normal working hours. (FAC Rule 17-210.700)

Expiration Date:

Issued this 5th day of May,
1994.

March 31, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District

160 Governmental Center

Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000114

Permit/Certification Number: A003-218014

Date of Issue:

Expiration Date: September 1, 1997

County: Bay

Latitude/Longitude: 30°08'40"N/85°37'05"W

Section/Township/Range: Parker/4S/14W

Project: Boiler No. 1

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. 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:

Operation of Boiler No. 1, operating rate 125,000 pounds of steam per hour. This boiler is fueled by natural gas and tall oil pitch. Particulate and sulfur dioxide emissions are controlled by filtration of pitch which reduces ash and sulfur content of the fuel. Nitrogen oxide's emissions are controlled by use of low NO_x burners and low excess air.

Located on Everitt Avenue, Panama City.

Specific Condition No. 4 requires pitch flow rate control and daily log maintenance.

Specific Condition No. 8 requires annual PM and VE tests due before the end of May.

Specific Condition No. 9 requires an NO_x test due in 1997 before the end of May.

Specific Condition No. 10 requires submittal of annual operation reports.

Specific Condition No. 11 requires submittal of permit renewal application by July 1, 1997.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000114

Permit/Certification Number: AO03-218014

Date of Issue: September 24, 1992

Expiration Date: September 1, 1997

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. This permit continues the applicability of BACT and PSD determination of AC03-23934 issued March 3, 1980.
3. The maximum allowable operating rate is 125,000 pounds of steam produced per hour. This is the operating rate at which compliance with standards shall be demonstrated.
4. Natural gas and tall oil pitch are the only fuels allowed to be used on this boiler. The quantity of pitch used as fuel in this boiler shall not exceed $(3934 \times 0.043 \text{ divided by } \% \text{ ash in pitch})$ pounds of pitch per hour. A daily log shall be maintained showing compliance with this limitation and shall be available for Department inspections. The quantity of pitch used and its ash content shall be a part of the annual test report data. The quantity of pitch used during the test shall be at least 90% of the maximum rate used in practice.
5. Particulate emissions shall not exceed 0.10 pounds per million BTU heat input.
6. Visible emissions shall not exceed 20% opacity under normal operation except for up to two minutes in any one hour at not more than 40% opacity.
7. Nitrogen oxides emissions shall not exceed 0.3 pounds as nitrogen dioxide per million Btu heat input.
8. Particulates and visible 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 in accordance with EPA methods 1, 2, 3, 5 and 9. Such tests shall be conducted once per year before the end of May. 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.
9. Nitrogen oxides 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 in accordance with EPA method 7E. Such tests shall be conducted in 1997 before the end of May to be submitted with the application for renewal of this permit. More frequent tests may be required if Department inspections show a need for such tests.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000114

Permit/Certification Number: AO03-218014

Date of Issue: September 24, 1992

Expiration Date: September 1, 1997

SPECIFIC CONDITIONS:

10. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

11. This permit prohibits the discharge of liquid effluents or contaminated runoff from your holding pond or from your facility unless appropriately permitted or exempted in accordance with State rules and regulations.

12. An application to renew this permit shall be submitted prior to July 1, 1997.

13. The permanent source identification number for this point source is 10PCY03000114. Please cite this number on all test reports and other correspondence specific to this permitted point source.

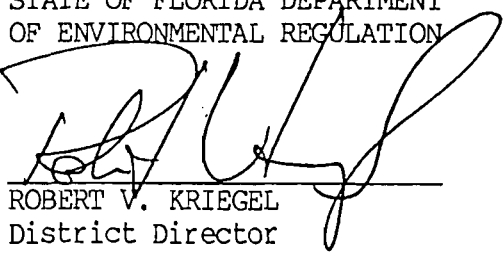
14. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours.

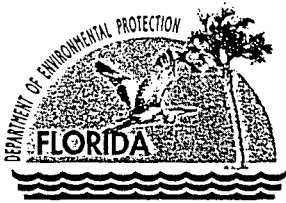
Expiration date:

September 1, 1997

Issued this 24th day of Sept,
1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEDEL
District Director



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

JANUARY 24, 1996

D. E. Garrett, Jr.
Plant Manager, Panama City Plant
Arizona Chemical
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Garrett:

This is in response to your January 10, 1996 letter requesting approval to replace an existing vacuum pump in Arizona Chemical's Semi-Commercial Plant, permit AC03-243481. We understand that the pumps are comparable, but that the replacement pump will provide improved operation at elevated temperatures with no increases in emissions.

We have no objection to the replacement.

For your information, since the pumps are similar and the replacement will not increase emissions, the replacement pump could have been installed and notification provided in page 2 of the operation permit application. We have enclosed a copy for your information.

If you have any questions, please contact Bob Kriegel of this office at (904) 444-8364.

Sincerely,

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

EKM:bkc

cc: DEP Northwest District Branch Office, Panama City
Encl.: page 2 of DEP Form 62-210.900(1)

FC



December 7, 1995

FedEx

ARIZONA CHEMICAL DIVISION
CALLER BOX 2447
PANAMA CITY FL 32402
PHONE 904 785 8521
FAX 904 785 1359

Mr. Ed Middleswart, P. E.
Program Administrator
Air Resources Management
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32501-5794

*Ed M
12/12*

Re: Semi-Commercial Plant
I.D. Number 10PCY03000118
Permit/Certification Number: AC03-243481
Arizona Chemical - Panama City

*file
12/12*

Dear Mr. Middleswart:

Specific Condition Number 7 of the referenced permit requires obtaining an operating permit before the expiration date of the construction permit for continued operation. The expiration date of the permit, per letter dated July 18, 1995, is December 31, 1995. Per 62-213.420(1)(a)4., F.A.C., *the expiration date of all air construction permits for Title V sources that expire between September 1, 1995, and November 1, 1996, are hereby extended to the later of November 1, 1996, or 240 days after commencing operation.*

If you have any questions call Richard F. Lee, Environmental Specialist, at (904) 785-8521 extension 258.

Sincerely,

ARIZONA CHEMICAL

A handwritten signature in dark ink, appearing to read "D. E. Garrett, Jr.".

D. E. Garrett, Jr.
Plant Manager

rfl

RECEIVED

DEC 11 1995

Northwest Florida
DEP

December 7, 1995

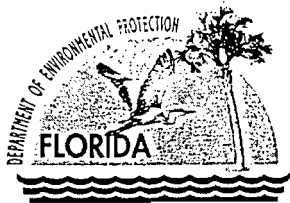
Page 2

cc: D. Gaddie
D. E. Garrett
K. P. Hiscock
S. Jagannath (Div.)
A. R. Jeffries
R. R. Klein
R. F. Lee (2)
J. V. Leitheiser
J. L. Muenchow
M. Ray
A. V. Whitlock (Div.)
Suzanne Thomas (Rust E & I)

RECEIVED

DEC 11 1995

Northwest Florida
DEP



F

Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

July 18, 1995

D. E. Garrett
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

ENTERED
JUL 25 1995

Dear Mr. Garrett:

This is in response to your request for modifications on your Semi-Commercial Plant, permit number AC03-243481.

By this letter permit AC03-243481 is modified as follows.

Specific Condition No. 4 is changed from:

4. The maximum estimated emission rate for volatile organic compounds (VOC) is 36 tons per year of which 24 tons per year are hazardous air pollutants (HAP). Demonstration of compliance with this requirement shall be made as per Specific Condition No. 6 of this permit. [FAC Rule 17-4.070]

to:

4. The maximum estimated emission rate for volatile organic compounds (VOC) is 36 tons per year of which 24 tons per year are hazardous air pollutants (HAP). Average hourly emissions rates for VOC and HAP are as follows:

<u>Compound</u>	<u>lb/hr</u>	<u>tons/yr</u>
VOC	8.22	36
HAP	5.48	24

Demonstration of compliance with these requirements shall be made by maintaining batch records with emission factors as required by Specific Condition No. 5 (revised March 13, 1995). Emissions estimates for the unit will be summarized on a quarterly basis and will be available for Department inspection. VOC and HAP emission estimates will be totaled individually.

A speciated breakdown of the HAP emissions is impractical due to the Research and Development nature of this unit. Documentation of each chemical used and emission estimates for VOC and HAP emissions produced will be maintained and will be available for Department inspection. [FAC Rule 62-4.070]


Page Two
Modification to AC03-243481

The expiration date on this permit is revised. By this letter permit AC03-243481 is extended to expire on December 31, 1995.

All other specific conditions of the permit remain in effect. This letter shall be attached to and made part of permit AC03-243481.

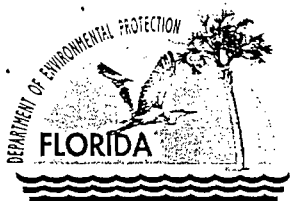
Sincerely,

A handwritten signature in cursive script, appearing to read "Gail K. Middleman", followed by a large, stylized capital "A" that serves as a flourish.

 for Bobby A. Cooley
District Director

BAC:rpc

cc: DEP Panama City Branch Office



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
April 4, 1995

Virginia B. Wetherell
Secretary

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts,

This letter is in response to your letter dated March 29, 1995, requesting an extension for air construction permit AC03-243481 for your Panama City facility, Semi-Commercial Plant, Source I.D. 10PCY03000018. *on 4/4/95*

By this letter permit AC03-243481 is extended. The revised expiration date is July 1, 1995. Please attach a copy of this letter to the existing permit.

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

Sincerely,


Bobby A. Cooley
District Director

BAC:rpw



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
March 13, 1995

Virginia B. Wetherell
Secretary

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your letter of February 21, 1995 requesting amendment to your Semi-Commercial Plant, permit number AC03-243481.

By this letter permit AC03-243481 is amended as follows.

Specific Condition 5 of the permit is changed from:

5. VOC and HAP emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance with the permitted maximum estimated emission rate. Tests shall be conducted in accordance with EPA Method 18 or other method approved by the Department. Such tests shall be conducted in 1995 before the end of February. 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. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. [FAC Rule 17-4.070]

to:

5. VOC and HAP emission estimates are required to show compliance with the standards of the Department. The estimates must provide reasonable assurance that the source is capable of compliance with the permitted maximum estimated emission rate. These estimates shall be based on process knowledge, material balance and approved EPA emission factors. (FAC Rule 62-4.070)

All other Specific Conditions remain in effect.

This letter shall be attached to and be made part of permit AC03-243481.

Sincerely,


Bobby A. Cooley
District Director

BAC:rpc

cc: DEP Division of Air Resources Management, Tallahassee
DEP Northwest District Branch Office, Tallahassee

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



Lawton Chiles
Governor

Florida Department of Environmental Protection

2001 1994

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000118
Permit/Certification Number: AC03-243481
Date of Issue: June 1, 1994
Expiration Date: April 2, 1995
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"W
Project: Semi-Commercial Plant

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. 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 Semi-Commercial Plant (SCP). This plant is a research and development unit which simulates on a reduced scale production operations from seven Arizona Chemical plant locations. The SCP consists of a series of reactors, evaporators, strippers, storage tanks, dryers, chillers, a flaker belt and a distillation column. Process equipment configurations vary based on production being simulated. Emissions from the SCP are controlled by condensers, scrubbers, and good operating practices. Scrubbers are batch units, and the scrubbing medium appropriate for the expected emissions are determined before operation of the SCP. Total VOC emissions are estimated at a maximum of 35.96 TPY with total HAPs estimated at a maximum of 24.14 TPY.

Located at Everitt Avenue, Panama City.

Specific Condition No. 5 requires emissions testing due in 1995 before the end of February.

Specific Condition No. 6 requires records of surrogate control parameters to be kept and be available for Department inspection.

Specific Condition No. 7 requires submittal of certificate of completion of construction with appropriate fee within 75 days after completion of construction.

Specific Condition No. 7 requires obtaining an operating permit before the expiration date (April 2, 1995) of this construction permit for continued operation.

Specific Condition No. 8 requires submittal of annual operation reports.

Specific Condition No. 9 requires submittal of annual operation fees.

PERMITTEE:
Arizona Chemical Company

I.D. Number: 10PCY03000118
Permit/Certification Number: AC03-243481
Date of Issue: June 1, 1994
Expiration Date: April 2, 1995

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 17-4.160]

Operation

2. The Semi-Commercial Plant may operate continuously, i.e., 8760 hrs/yr, based on 24 hours/day, 7 days/week and 52 weeks per year. [FAC Rule 17-4.060]
3. This source shall be operated in such a fashion so as to preclude objectionable odors. [FAC Rule 17-296.401]

Emissions

4. The maximum estimated emission rate for volatile organic compounds (VOC) is 36 tons per year of which 24 tons per year are hazardous air pollutants (HAP). Demonstration of compliance with this requirement shall be made as per Specific Condition No. 6 of this permit. [FAC Rule 17-4.070]

Testing

5. VOC and HAP emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance with the permitted maximum estimated emission rate. Tests shall be conducted in accordance with EPA Method 18 or other method approved by the Department. Such tests shall be conducted in 1995 before the end of February. 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. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. [FAC Rule 17-4.070]

Administrative

6. The use of surrogate control parameters to minimize VOC and HAP emissions is required. The minimum/maximum/range of such parameters are quantified in tables submitted by Arizona Chemical Company dated March 23, 1994 (tables are attached to this permit). Records of the required parameters for each product run and the actual parameter values shall be kept and be available for Department inspection. [FAC Rule 17-4.070]
7. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. A Certificate of Completion [Form DEP 17-1.202(3) attached] shall be submitted with the compliance test results and appropriate fee as application for an operation permit. These are to be submitted within 75 days after completion of construction. The permittee shall obtain an operating permit for this source before the expiration of this construction permit if the permittee desires to continue operation. [FAC Rule 17-4.050]

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000118
Permit/Certification Number: AC03-243481
Date of Issue: June 1, 1994
Expiration Date: April 2, 1995

SPECIFIC CONDITIONS:

8. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1st of each year. The attached form shall be reproduced by the Permittee and used for future annual submittals. [FAC Rule 17-210.370]

9. In accordance with FAC Rule 17-213, 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 (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

10. The permanent source identification number for this point source is 10PCY03000118. Please cite this number on all test reports and other correspondence specific to this permitted point source. [FAC Rule 17-297.570]

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, 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 17-210.700]

Expiration Date:

Issued this 1ST day of June,
1994.

April 2, 1995

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director

SCP EMISSION CONTROL PARAMETERS

23-Mar-94

09:19 AM

I. Batch Refining Operation, Methanol Purification

Equipment Item	Parameter	Minimum	Maximum	Range	Observation	Log Frequency
Main Condenser T-150	Water flow FI-30	20 gpm	N/A	20 to 50 gpm	Field	4 hr
Main Condenser T-150	Condensate temp. TE-72	N/A	45 C	25 to 45 C	Control Room	4 hr
Vent Condenser T-153	Cold Glycol temp. TE-70	N/A	-8 C	-8 to -14 C	Control Room	4 hr
Vent Condenser T-153	Cold Glycol flow FI-31	15 gpm	N/A	15 to 30 gpm	Field	4 hr
Spray scrubber G-207	Water flow FI-21	5 gpm	N/A	5 to 8 gpm	Field	4 hr
Barometric Condenser G-208	Water flow FI-22	5 gpm	N/A	5 to 7 gpm	Field	4 hr

II. Batch Refining Operation (vacuum), Terpene Purification

Equipment Item	Parameter	Minimum	Maximum	Range	Observation	Log Frequency
Main Condenser T-150	Water flow FI-30	20 gpm	N/A	20 to 50 gpm	Field	4 hr
Main Condenser T-150	Condensate temp. TE-72	N/A	60 C	25 to 60 C	Control Room	4 hr
Vent Condenser T-153	Cold Glycol temp. TE-70	N/A	-8 C	-8 to -14 C	Control Room	4 hr
Vent Condenser T-153	Cold Glycol flow FI-31	15 gpm	N/A	15 to 30 gpm	Field	4 hr
Spray scrubber G-207	Water flow FI-21	5 gpm	N/A	5 to 8 gpm	Field	4 hr
Barometric Condenser G-208	Water flow FI-22	5 gpm	N/A	5 to 7 gpm	Field	4 hr

III. Batch Rosin Ester in RE-150; Hypo phosphorous acid addition step.

Equipment Item	Parameter	Minimum	Maximum	Range	Observation	Log Frequency
Packed Scrubber G-61	Water flow FI-54	1 gpm	N/A	1 to 2 gpm	Field	4 hr
Packed Scrubber G-61	Scrubber Liq. Temp TE-56	N/A	40 C	25 to 40 C	Control Room	4 hr
Hypo Spray Scrubber G-21	Scrubber flow FI-23	1 gpm	N/A	1 to 2 gpm	Field	4 hr
Hypo Spray Scrubber G-21	Scrubber liquid assay	1.5%	N/A	1.5 to 2.5%	Lab sample	per batch

IV. Batch Phenolic Modified Rosin ester in RE-151, formaldehyde venting step

Equipment Item	Parameter	Minimum	Maximum	Range	Observation	Log Frequency
Packed Scrubber G-61	Water flow FI-54	1 gpm	N/A	1 to 2 gpm	Field	4 hr
Packed Scrubber G-61	Scrubber Liq. Temp TE-56	N/A	40 C	25 to 40 C	Control Room	4 hr
Hypo Spray Scrubber G-21	Scrubber flow FI-23	1 gpm	N/A	1 to 2 gpm	Field	4 hr
Barometric Condenser G-24	Water flow FI-22	12 gpm	N/A	12 to 20 gpm	Field	4 hr

V. Batch Terpene Resin Makeup in G-200, quench and wash steps

Equipment Item	Parameter	Minimum	Maximum	Range	Observation	Log Frequency
Condenser T-200	Condensate temp. TE-80	N/A	40 C	25 to 40 C	Control Room	4 hr
Scrubber G-205	Water flow FI-25	1.8 gpm	6 gpm	1.8 to 6 gpm	Field	4 hr



Department of Environmental Protection

ENTERED

APR 10 1995

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000119
Permit/Certification Number: AO03-265814
Date of Issue: April 4, 1995
Expiration Date: March 31, 2000
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"W
Project: Rosin Flaker Dust Handling System

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:

Operation of a Rosin Flaker Belt Dust Collection System consisting of a hopper, weigh scale, and bag collection hood for two flaker belts vented to a Torit DFT4-16 Dust Collector. Dust collected by the collector will be recycled into products.

Operation of this source shall be consistent with the operation permit application dated February 20, 1995, and additional information dated March 17, 1995, and construction permit AC03-247523 issued June 1, 1994 with letter changes dated September 9, 1994 and November 23, 1994.

Located at the south end of Everitt Avenue, Panama City, Bay County.

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000119

Permit/Certification Number: AO03-265814

Date of Issue: April 4, 1995

Expiration Date: March 31, 2000

SPECIFIC CONDITIONS:

General

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

Operation

2. The maximum allowable operating rate is 9000 pounds Rosin Ester flaked per hour. This is the operating rate at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department.

The initial allowable operating rate as of February 10, 1995 (date of test report for February 9, 1995 VE test) is limited to 8,166 pounds/hour (110% of 7424 lbs/hr test rate). (FAC Rule 62-4.070)

3. The hours of operation are unlimited. (Construction permit AC03-247523)

4. The Permittee shall continuously monitor performance of the Dust Collection System in accordance with the plan enclosed by letter dated March 17, 1995. Additionally:

- The Permittee shall advise the Department within 45 days of the pressure drop across the cartridge filter system shown to be indicative of acceptable baghouse operation.

- Records of operating parameters shall be maintained for the life of the permit.

- The Permittee shall immediately advise the Department in writing of any cartridge failures that allow the release of particulate matter and of the corrective actions taken to address the problem. (FAC Rule 62-4.070)

PERMITTEE:
Arizona Chemical Company

I.D. Number: 10PCY03000119
Permit/Certification Number: AO03-265814
Date of Issue: April 4, 1995
Expiration Date: March 31, 2000

SPECIFIC CONDITIONS:

Emissions

5. The maximum allowable emission limit for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>
Source 19		
VE	62-297.620	5% opacity
"Hot end" emissions		
VE	62-296.310(2)	20% opacity

6. This source shall be operated in such a fashion so as to preclude objectionable odors. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to FAC Rule 62-296.200(123).

If the Department determines objectionable odors are being emitted from this facility, the Permittee shall submit within 45 days of receipt of written notification from the Department an odor remediation plan. The plan shall include, but is not limited to, the following:

1. Dispersion modeling analysis to show compliance with ambient acceptable odor threshold value(s).
2. Strategies to reduce odorous chemical utilization or emissions.
3. Modification of manufacturing production cycles.
4. Modifications of manufacturing methods.
5. Modifications of plant exhaust systems.

(FAC Rule 62-296.320(2))

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000119

Permit/Certification Number: AO03-265814

Date of Issue: April 4, 1995

Expiration Date: March 31, 2000

SPECIFIC CONDITIONS:

Testing

7. Visible emissions tests for the emissions from the dust collection system (source 19) shall be performed between September 1 and October 31, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>	<u>Reference</u>
VE	annually	DEP method 9	62-297.620

The VE tests shall be for a duration of thirty minutes. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.340(2).

8. Test reports shall comply with F.A.C. Rule 62-297.570, Test Reports. Additionally, the compliance test report shall provide the following information on the air pollution control devices:

a. General condition of equipment, noting any deficiencies or problems with the equipment which occur during testing.

b. Normal operating parameters of the equipment and the actual operation parameters for each test run, including:

1. Pressure drop across the baghouse
2. Baghouse inlet temperature

Administrative

9. An annual operation report [DEP Form 62-210.900(5) attached] shall be submitted by March 1 each year. (FAC Rule 62-210.370)

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000119

Permit/Certification Number: A003-265814

Date of Issue: April 4, 1995

Expiration Date: March 31, 2000

SPECIFIC CONDITIONS:

10. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(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 completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

11. An application to renew this permit shall be submitted as required for a Title V permit (FAC Rule 62-210).

12. The permanent source identification number for this point source is 10PCY03000119. Please cite this number on all test reports and other correspondence specific to this permitted point source. (FAC Rule 62-297.570)

13. 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, use telephone number (904) 872-4375 during normal working hours. (FAC Rule 62-210.700)

Expiration Date:

Issued this 4th day of April, 1995.

March 31, 2000

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Department of Environmental Protection

RECEIVED
MAR 27 1995

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000126,27
Permit/Certification Number: A003-255158
Date of Issue: September 15, 1994
Page One (1) Amended: September 28, 1994
Expiration Date: August 31, 1999
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"N
Project: Two Dust Collectors for
Polyterpene Resin Flakers

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:

Operation of Two Dust Collectors for two Polyterpene Resin Flaker lines with maximum operating rates of 5,000 pounds of hot resin per hour. Terpene Resins are heated and poured in pastilles (droplets) on top of a moving belt. Water is sprayed on the bottom of the belt to cool the hot resin. The pastilles are conveyed to a hopper for bagging. Dust emitted from each flaker line belt, conveyer and bagging operation is collected and controlled by a dust collector with greater than a 99.9% removal efficiency. Line 1 utilizes a Torit Model DFT3-12 dust collector, and line 2 utilizes a Torit Model DFT4-16 dust collector.

Operation of this source shall be consistent with the operation permit application dated July 27, 1994, additional information dated September 1, 1994, and construction permit AC03-241146 issued February 4, 1994.

Located at the South end of Everitt Avenue, Panama City.

Specific Condition No. 2 establishes a maximum allowable operating and testing rate.

Specific Condition No. 3 establishes emission limits.

Specific Condition No. 6 establishes compliance testing requirements.

Specific Condition No. 7 requires submission of annual operating reports.

Specific Condition No. 8 requires submission of Major Air Pollution Source Annual Operation Fee Forms.

Specific Condition No. 9 requires submission of a renewal application as required for a Title V permit.

A003-255158

1

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Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
September 28, 1994

Virginia B. Wetherell
Secretary

John T. Trouts
Plant Manager
Arizona Chemical Company
Caller Box 2447
Panama City, Florida 32402

Dear Mr. Trouts:

This is in response to your September 21, 1994 letter requesting a change in the process description on the first page of permit AO03-255158, issued September 15, 1994.

Your request is approved; and, an amended copy of the first page of the issued permit is enclosed. Please replace the existing page 1 with the amended page.

We appreciate your bringing this to our attention. If you have any further questions, please contact Bob Kriegel at 444-8264.

Sincerely,

Bobby A. Cooley
District Director

BAC:bkc

cc: DEP Division of Air Resources Management, Tallahassee



Department of Environmental Protection

F

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000126,27
Permit/Certification Number: A003-255158
Date of Issue: September 15, 1994
Expiration Date: August 31, 1999
County: Bay
Latitude/Longitude: 30°08'40"N/85°37'05"N
Project: Two Dust Collectors for
Polyterpene Resin Flakers

*1st copy
2nd copy*

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:

Operation of Two Dust Collectors for two Polyterpene Resin Flaker lines with maximum operating rates of 5,000 pounds of hot resin per hour. Polyterpene resin is heated and poured in a thin layer on top of a moving belt. The resin cools as it is conveyed and cracks and flakes. The flakes are conveyed to a hopper for bagging. Dust emitted from each flaker line belt, conveyer and bagging operation is collected and controlled by a dust collector with greater than a 99.9% removal efficiency. Line 1 utilizes a Torit Model DFT3-12 dust collector, and line 2 utilizes a Torit Model DFT4-16 dust collector.

Operation of this source shall be consistent with the operation permit application dated July 27, 1994, additional information dated September 1, 1994, and construction permit AC03-241146 issued February 4, 1994.

Located at the South end of Everitt Avenue, Panama City.

Specific Condition No. 2 establishes a maximum allowable operating and testing rate.

Specific Condition No. 3 establishes emission limits.

Specific Condition No. 6 establishes compliance testing requirements.

Specific Condition No. 7 requires submission of annual operating reports.

Specific Condition No. 8 requires submission of Major Air Pollution Source Annual Operation Fee Forms.

Specific Condition No. 9 requires submission of a renewal application as required for a Title V permit.

A003-255158

1

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

PERMITTEE:
Arizona Chemical Company

I.D. Number: 10PCY03000126,27
Permit/Certification Number: AO03-255158
Date of Issue: September 15, 1994
Expiration Date: August 31, 1999

SPECIFIC CONDITIONS:

General

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

Operation

2. The maximum allowable operating rate for each flaking belt is 5000 pounds of hot resin per hour. This is the operating rate at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department. (FAC Rule 62-4.070)

3. The hours of operation are unlimited. (Construction permit AC03-241146)

Emissions

4. The maximum allowable emission limit for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>
PM*	62-296.310	4.87 lbs/hr
VE	62-296.310	less than 20% opacity

* PM emissions are on a per source basis - per dust collector

5. This source shall be operated in such a fashion so as to preclude objectionable odors. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to FAC Rule 62-296.200(123).

If the Department determines objectionable odors are being emitted from this facility, the Permittee shall submit within 45 days of receipt of written notification from the Department an odor remediation plan. The plan shall include, but is not limited to, the following:

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000126,27

Permit/Certification Number: AO03-255158

Date of Issue: September 15, 1994

Expiration Date: August 31, 1999

SPECIFIC CONDITIONS:

1. Dispersion modeling analysis to show compliance with ambient acceptable odor threshold value(s).
2. Strategies to reduce odorous chemical utilization or emissions.
3. Modification of manufacturing production cycles.
4. Modifications of manufacturing methods.
5. Modifications of plant exhaust systems.

[FAC Rule 62-296.320(2)]

Testing

6. Emissions tests for the following pollutants shall be performed between February 28 and March 31, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>	<u>Reference</u>
VE	annually	DEP method 9	FAC Rule 62-297
PM	once, 1999	EPA method 5	FAC Rule 62-297

The VE test shall be for a duration of sixty minutes and shall be conducted during one of the PM test runs. Test reports shall comply with FAC Rule 62-297.570, Test Reports. The Department can require special compliance tests in accordance with FAC Rule 62-297.340(2).

Administrative

7. An annual operation report [DEP Form 62-210.900(4) enclosed] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals. (FAC Rule 62-210.370)

8. In accordance with FAC Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11) enclosed] 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

PERMITTEE:

Arizona Chemical Company

I.D. Number: 10PCY03000126,27

Permit/Certification Number: AO03-255158

Date of Issue: September 15, 1994

Expiration Date: August 31, 1999

SPECIFIC CONDITIONS:

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 (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

9. An application to renew this permit shall be submitted prior to June 30, 1999 (FAC Rule 62-4.090) or as required for a Title V permit. FAC Rule 62-210)

10. The permanent source identification numbers for this point sources are:

- 10PCY03000126 - Dust collector for line 1, Torit Model DFT3-12
- 10PCY03000127 - Dust collector for line 2, Torit Model DFT4-16

Please cite these numbers on all test reports and other correspondence specific to these permitted point sources. (FAC Rule 62-297.570)

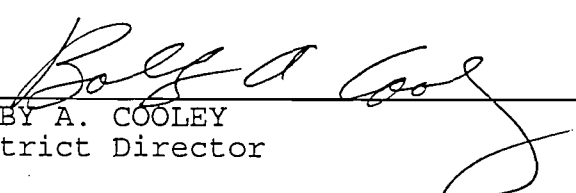
11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 872-4375 during normal working hours. (FAC Rule 62-210.700)

Expiration Date:

Issued this 15th day of September, 1994.

August 31, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



BEST AVAILABLE COPY

Department of Environmental Protection

FILE COPY

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

FEB 11 1997
Virginia B. Wetherell
Secretary

PERMITTEE:

Arizona Chemical Division;
International Paper

AIRS I.D. Number: 0050001
Air Permit Number: 0050001-004-AC
Emission Unit: 028
Date of Issue: February 5, 1997
Expiration Date: February 5, 2002
County: Bay
Project: Mist Eliminator for Terpene Resin
Flaker Belts, Resin Holding Tanks
and Drumming Station

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 Monsanto Brinks Mist Eliminator and associated duct work for the control of emissions from the hot ends of the terpene resin flaker belts (A&B), resin holding tanks (180-36A, 180-36B, 160-14A, 160-14B) and the drumming station. Fugitive visible emissions, HAPs and VOCs from these process areas will be reduced by this installation.

Construction shall be consistent with the construction permit application dated January 17, 1997.

Located at 2 Everitt Avenue, Panama City.

0050001-004-AC

1

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Printed on recycled paper.

PERMITTEE:

Arizona Chemical Division;
International Paper

AIRS I.D. Number: 0050001

Air Permit Number: 0050001-004-AC

Emission Unit: 028

Date of Issue: February 5, 1997

Expiration Date: February 5, 2002

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 upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. Projects beyond one year require annual status reports. [FAC Rule 62-4.030]
3. Satisfactory ladders, platforms and other safety devices as well as necessary parts shall be provided/made available to facilitate an adequate inspection program. [FAC Rule 62-297.310(6)]

Operation

4. The maximum allowable operating rate of the terpene resin flaker belts (A&B) is 10,000 pounds per hour. This is the operating rate at which compliance with standards shall be demonstrated. [FAC Rule 62-4.070 and construction permit application]
5. This emission unit is allowed to operate continuously, i.e., 8760 hrs/yr. [FAC Rule 62-4.070 and construction permit application submitted January 17, 1997]
6. All vats, containers, etc., that are used for temporary and permanent storage of VOC/organic solvents shall be covered to prevent vaporization of VOC when not in use. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials. [FAC Rule 62-296.320(1)(a)]

Emissions

7. No visible emissions (VE less than or equal to 5% opacity) are allowed under normal operation. [FAC Rule 62-297.620(4)]
8. All fugitive dust generated at this site shall be adequately controlled by existing good housekeeping and maintenance practices such as regular sweeping and vacuuming. [FAC Rule 62-296.320(4)]

PERMITTEE:

Arizona Chemical Division

AIRS I.D. Number: 0050001

Air Permit Number: 0050001-004-AC

Emission Unit: 028

Date of Issue: February 5, 1997

Expiration Date: February 5, 2002

SPECIFIC CONDITIONS:

9. 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 62-296.320(2)]

Testing

10. A visible emissions test of a duration of 30 minutes is required to show 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. [FAC Rule 62-4.070] Tests shall be conducted in accordance with DEP method 9 within 30 days of completion of construction. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

Test reports shall comply with F.A.C. Rule 62-297.310, Test Reports. Additionally, the compliance test report shall provide the following information on the air pollution control devices:

a. General condition of equipment, noting any deficiencies or problems with the equipment which occur during testing.

b. Normal operating parameters of the equipment and the actual operation parameters for each test run.

The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

PERMITTEE:

Arizona Chemical Division

AIRS I.D. Number: 0050001

Air Permit Number: 0050001-004-AC

Emission Unit: 028

Date of Issue: February 5, 1997

Expiration Date: February 5, 2002

SPECIFIC CONDITIONS:

Administrative

11. An annual operating report for air pollutant emitting facility, DEP Form 62-210.990(5), shall be submitted by March 1 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]

12. 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. Applicant shall submit appropriate amendments to the facility's Title V permit application within 60 days of completion of construction. [FAC Rule 62-210(300)]

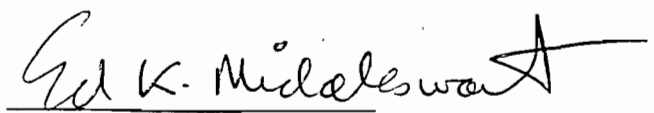
13. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department 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 completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

14. 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) 413-9911. For routine business, telephone (904) 872-4375 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

Issued this 5th day of Feb.,
1997.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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