



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

November 13, 2003

Mr. Khalid Hasna
Environmental Specialist
Arizona Chemical
Caller Box 59447
Panama City, FL 32412-0447

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP):
Miscellaneous Organic Chemical Manufacturing

Dear Mr. Hasna:

The 112(j) notification that was submitted for the Arizona Chemical, Panama City, facility last year indicated that the facility might be subject to the NESHAP (40 CFR 63 Subpart FFFF) for Miscellaneous Organic Chemical Manufacturing. You may be interested in knowing that the USEPA published the **final** NESHAP regulation for this source category in the Federal Register on November 10, 2003. Therefore, 112(j) requirements no longer apply to Miscellaneous Organic Chemical Manufacturing emissions units.

If you are interested in reading the final standards, the NESHAP and a Fact Sheet explaining the standards may be accessed through the USEPA website at <http://www.epa.gov/ttn/atw/mon/monpg.html>.

If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or Robert.Bull@dep.state.fl.us.

"Existing" affected sources must be in compliance with Subpart FFFF standards by November 10, 2006. For the purposes of Subpart FFFF, affected sources are "existing" if construction or reconstruction of the affected source commenced before April 5, 2002.

Since the 112(j) notification indicated that Arizona Chemical might also be subject to Subpart DDDDD-I/C/I Boilers and Process Heaters, the facility may still be required to submit a 112(j) MACT Title V permit revision application by April 28, 2004 for the affected emissions units; unless this proposed subpart is final by then.

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

Sincerely,

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

c: Sandra Veazey, FDEP-NWD

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BUREAU OF AIR REGULATION

ARIZONA CHEMICAL DIVISION
CALLER BOX 59447
PANAMA CITY FL 32412-0447
PHONE 850 785 8521
FAX 850 785 1359

April 25, 2002

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

**RE: 112(j) Notification Information for Facility ID No. 0050001
Panama City, Florida Facility**

Dear Ms. Phillips:

This letter shall serve as a response to Florida Department of Environmental Protection's letter signed by Mr. Scott M. Sheplak, dated April 5, 2002, requesting notification information according to 112(j) notification information requirements.

Arizona Chemical, a subsidiary of International Paper, owns and operates the Panama City facility, located at 2 Everitt Avenue in Panama City, Florida. The facility manufactures products that are made from by-products purchased from kraft pulp mills. The Arizona Chemical Panama City facility processes black liquor soap (BLS), crude tall oil (CTO), and crude sulfate turpentine (CST) into chemical intermediates and resins which are sold into commerce and used as ingredients in the production of adhesives, plastics, inks, paints, rubber products, roofing material, chewing gum, fragrances, household cleaners, and soap. Operations at the facility are classified under Standard Industrial Classification (SIC) codes 2821 (plastics materials, synthetic resins, and non-vulcanizable elastomers), 2861 (gum and wood chemicals), 2869 (industrial organic chemical, not elsewhere classified [n.e.c]) and 2899 (chemicals and chemical preparations, n.e.c.). The facility was originally constructed in 1936. The facility meets the regulatory definition of a major source for Title V purposes; the facility-wide potential to emit (PTE) emissions of volatile organic compounds (VOCs), oxides of nitrogen (NOx), particulate matter (PM), sulfur dioxide (SO₂) is greater than 100 tons per year and aggregate emissions of hazardous air pollutants (HAPs) are greater than 25 tons per year.

The facility has two major operational areas: the tall oil operations and the terpene/resin operations, in addition to the ancillary facilities that include utilities, wastewater operations and a semi-commercial plant.

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Arizona Chemical believes that the Panama City facility may fall in the following affected industry type source categories:

- Industrial, Commercial, and Institutional Boilers and Indirect-fired Process Heaters; and
- Miscellaneous Organic Chemical Production and Processes

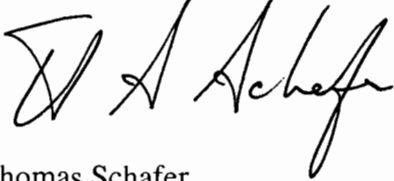
The following emission units may be may belong to the above listed industry type source categories:

- Steam Boilers No. 1 & 2
- Terpene Resin plant
- Tall oil refinery
- Terpene Refinery

If you have any questions, or if you need more information, please call Khalid Hasna, Environmental Specialist, at (850) 914-8256.

Sincerely,

ARIZONA CHEMICAL

A handwritten signature in black ink, appearing to read 'T. A. Schafer', written over the printed name.

Thomas Schafer,
Plant Manager

112(j) Notification Information
Facility ID No. 0050001

cc: Mr. Doug Neely
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303 – 8960

Ms. Sandra Veazey
Air Resource Management
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501 – 5794