



CHEMICAL COMPANY • 1001 East Business Highway 98 • Panama City, Florida 32401 • (904) 785-6700

October 14, 1988

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DER-BAQM

Mr. Ed Middleswart
Florida Department of Environmental Regulations
160 Governmental Center
Pensacola, Florida 32501

Dear Mr. Middleswart:

Our project engineer for repairing the No. 2 Boiler, Blaine Casali, and I visited Bill Thomas and Mike Harley of Central Air Permitting on October 13, 1988. We discussed our proposed repair and reactivation of the boiler.

Our discussions indicated a reconstruction analysis of this project should show it to constitute a repair of the boiler. Mr. Thomas stated that CAP would not require a construction permit if the district office is willing to reissue the original permit upon completion of the repair and compliance testing.

In your absence I talked with Jack Preece. He said if CAP did not require a construction permit he would be willing to accept our going ahead with the repair and reissuing the permit upon successful compliance testing.

The permit would have the same fuel and specific conditions as A003-60603 with the exception of increasing the Specific Condition 14 operating limit of 100,000 pounds of steam per hour to 125,000 lbs/hr. The Specific Condition 22 restriction of pitch would be contingent upon the compliance test demonstration.

Attached is Mr. Casali's reconstruction analysis presented as we understand it should be from our meeting with CAP.

If I have misunderstood the intentions of Mr. Thomas or Mr. Preece, please advise me. Otherwise, we will proceed with the boiler repair without a construction permit.

Regards,

C. O. Warrell

COW:jap

Attachment

cc: Blaine Casali
Bill Thomas
Mike Harley
Jack Preece

INTEROFFICE CORRESPONDENCE

ARIZONA CHEMICAL COMPANY

Panama City, Florida - October 14, 1988

OFFICE

DATE

TO: Panama City, Florida

ATT'N. OF: Mr. C. O. Warrell

COPY TO: Mr. L. F. Ciesielski
Mr. C. C. Greer
Mr. R. W. Sombathy

SUBJECT: ARIZONA CHEMICAL - PANAMA CITY, FLORIDA
EP-496 UPGRADE PANAMA CITY STEAM FACILITIES
NO. 2 BOILER RECONSTRUCTION ANALYSIS

REFERENCE:

As suggested by Mr. William A. Thomas of the Bureau of Air Quality Management of the Florida Department of Environmental Regulation, we have completed a reconstruction analysis of our No. 2 boiler per section 60.15 of the New Source Performance Standards (NSPS). The only unit being repaired is the boiler and refractories. The existing steam and mud drums, combustion air fan, breeching, stack, foundations and safety equipment will all be reused. The installation of an entirely new facility would necessitate the purchase and installation of the above items.

Based on this analysis, this capitalized repair will only cost 26% of a comparable new installation and is technologically feasible and should not be considered as reconstruction.

Because of the need for major repairs to this boiler, we have been unable to operate the unit since 1986 and cannot conduct any required air quality emission tests until repairs are completed.

Based on quoted equipment deliveries and preliminary construction schedules, the work will be complete in mid-1989.



A. B. Casali

ABC/phf