



Bruce

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 10, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Suresh Chandnani, P.E.
Project Manager
RUST Environment and Infrastructure, Inc.
Freedom Commerce Centre
8375 Dix Ellis Trail, Suite 402
Jacksonville, Florida 32256

Dear Mr. Chandnani:

This letter is in response to your June 26 submittal, Permitting of SO₂ Emissions of Bush Boake Allen, Incorporated (BBA), Jacksonville, Florida.

After carefully reviewing the entire submittal, it is evident that a complete review with appropriate source documents is necessary to determine whether PSD NSR applicability has been triggered. When that determination is made, your inquiry about Title V will be addressed.

To facilitate the PSD NSR applicability review please provide the following information:

- (1). Two additional copies (without any confidential information) of your June 26 submittal. We need a work copy and a copy for EPA.
- (2). Summary sheets for all mass emissions tests for TRS, SO₂, NO_x, CO, PM/PM₁₀, and any other regulated pollutant for which tests have been conducted since boilers 2 and 3 were constructed.
- (3). All construction and operation permits and any revisions that have been issued for boilers 2 and 3.
- (4). Copies of correspondence to or from the agency regarding SO₂ emissions from TRS incineration.

Mr. Suresh Chandnani
July 10, 1995
Page Two

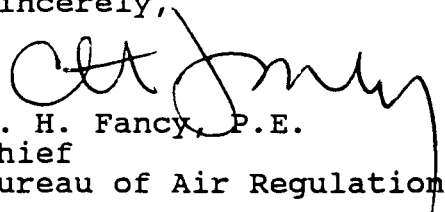
(5). Confirm actual stack heights of boilers 2 and 3.

(6). A summary of actions taken to address PSD increments and Class 1 area impacts on air quality-related values (AQRV's) and any supporting documentation that has not been sent to this office.

(7). A summary of any known violations of TRS permit or rule limits.

If you have any questions, please contact Bruce Mitchell at 904/488-1344 or write to him at the letterhead address.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jb/k

cc: William Van Duyn, BBA
Steve Pace, RESD
Pat Comer, Esq., DEP
Al Linero, DEP



Bush Boake Allen Inc.
2051 N. Lane Avenue
Jacksonville, Florida 32254

Tel: (904) 783 2180
(800) 874 9220

RECEIVED

JUN 12 1996

BUREAU OF
AIR REGULATION

June 10, 1996

Mr. Robert J. Leetch
Florida Dept. of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7577

**RE: Title V Permit Application and Requested
SO₂ Emissions Cap on BBA's Boilers**

Dear Mr. Leetch:

BBA's Title V permit application includes a requested SO₂ emissions cap equivalent to 3,337 TPY from its two boilers. This emissions cap would include previously permitted emissions of 499 TPY resulting from the combustion of fuel oil containing a maximum of 0.7% sulfur, plus potential emissions of SO₂ from the mandatory incineration of TRS vapors which heretofore have not been subject to an emissions limit.

Complete documentation supporting the requested emissions cap was submitted by BBA under a cover letter to FDEP's Bureau of Air Regulation dated May 16, 1996. The Bureau responded in a letter from Mr. C. H. Fancy dated June 4, 1996, proposing that BBA submit a letter with its Title V permit application requesting that its Title V permit not be issued until the preconstruction review issue resulting from the emission cap request is resolved. The Bureau also requested that air construction permits limiting SO₂ emissions be listed in the Title V permit application. This letter and BBA's Title V permit application comply with the Bureau's requests.

Also, BBA's Title V permit application proposes use of a Continuous Monitoring System (CMS) to monitor compliance with the requested SO₂ emissions cap and the 100 PPM CO emissions limit which is a permitted surrogate for the 1 PPM TRS emissions limit. BBA requests a meeting with you at the appropriate time, prior to issuance of its draft Title V permit, to precisely establish all permit conditions related to the use of the CMS and the date of its implementation. This should be done after DEP completes its review of the proposed SO₂ emissions

cap, but in time to allow for specification, selection, purchase, installation and testing of the CMS prior to the date of its required use.

Sincerely,



J. M. Baggett
Director Worldwide Operations
and Resident Manager

WVD/JMB/sh

cc: Mr. Clair Fancy, FDEP
Mr. Al Linero, FDEP
Mr. Suresh Chandnani, RUST
Mrs. Angela Morrison, HGSS

LEETCH7.DOC (wvd6/10/96)

cc: J. Brown



Bush Boake Allen Inc.
2051 N. Lane Avenue
Jacksonville, Florida 32254

Tel: (904) 783 2180
(800) 874 9220

RECEIVED

Clair Du Howard
10/24

October 18, 1995

OCT 23 1995

Division of Air
Resources Management

Mr. Howard Rhodes
Florida Dept. of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

AIR REGULATION
BUREAU OF

OCT 27 1995

RE: Permitting of SO₂ Emissions at Bush Boake Allen Inc.

RECEIVED

Dear Mr. Rhodes:

On behalf of Bush Boake Allen Inc. (BBA), RUST Environmental and Infrastructure submitted a letter and information package dated June 23, 1995 to you requesting a review of issues relating to the permitting of SO₂ emissions from BBA's facility in Jacksonville. Mr. Clair Fancy, in a letter dated July 10, 1995, requested additional information relating to that submittal.

BBA now requests that its submittal and its pending reply to Mr. Fancy's letter be held in abeyance while it evaluates another option relating to its potential to emit SO₂ from the incineration of TRS. We will contact the Department after our evaluation is completed.

Sincerely,

William B. Van Duyn
Sr. Environmental Specialist

WBVD/sh

cc: Mr. Suresh Chandnani, RUST E&I

RHOD1018



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 10, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Suresh Chandnani, P.E.
Project Manager
RUST Environment and Infrastructure, Inc.
Freedom Commerce Centre
8375 Dix Ellis Trail, Suite 402
Jacksonville, Florida 32256

Dear Mr. Chandnani:

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After carefully reviewing the entire submittal, it is evident that a complete review with appropriate source documents is necessary to determine whether PSD NSR applicability has been triggered. When that determination is made, your inquiry about Title V will be addressed.

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Mr. Suresh Chandnani
July 10, 1995
Page Two

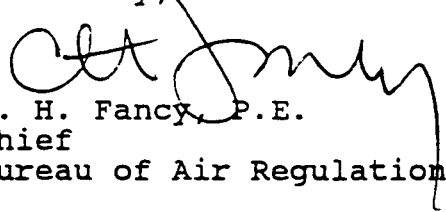
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(7). A summary of any known violations of TRS permit or rule limits.

If you have any questions, please contact Bruce Mitchell at 904/488-1344 or write to him at the letterhead address.

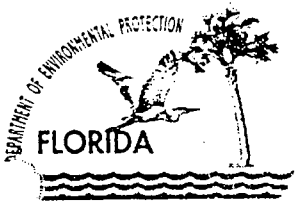
Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jb/k

cc: William Van Duyn, BBA
Steve Pace, RESD
Pat Comer, Esq., DEP
Al Linero, DEP



A. File

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
June 4, 1996

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Baggett
Resident Manager
Bush Boake Allen Inc.
2051 N. Lane Avenue
Jacksonville, Florida 32254

Re: Sulfur Dioxide Emission Study Report
Bush Boake Allen Inc., Jacksonville Facility

Dear Mr. Baggett:

This letter is in response to the your inquiry of May 16 accompanying the referenced report proposing a three-tiered sulfur dioxide emissions limit for the your Title V permit. Emissions are primarily from incineration of Total Reduced Sulfur (TRS) from processing of crude sulfate turpentine.

Construction permits for boilers 2 and 3 limited sulfur dioxide emissions to 249 tons per year from fuel oil burning, apparently to avoid PSD applicability in the past. Before inclusion of any higher sulfur dioxide emission limits in your Title V permit it will be necessary to conduct preconstruction review to account for the emissions increases immediately caused by implementation of TRS control, by subsequent physical modifications of the boilers to burn TRS, and by production increases over the years. It will take some time to determine whether PSD is applicable in the (after-the-fact) preconstruction review. We have asked for assistance from our Office of General Counsel as well as a review by EPA Region IV of the applicability to this case of their procedures which were cited several times in your justifications for exemptions.

The EPA memorandum dated July 1, 1994 to the Regions does provide for exemptions from PSD for certain pollution control projects. We believe that these exemptions have to do with projects that cause incidental increases of certain air emissions while resulting in significant control of others. For example, a new air pollution control system for acid gases, mercury, dioxins, etc. at an existing waste-to-energy facility might have some increases associated with auxiliary boilers to preheat that equipment, grind absorbing reagents, etc. EPA does not require such a project to be subjected to PSD review. However, complete transformation of one pollutant to another (TRS to sulfur dioxide) pollutant does not fall under this possible exemption as we understand it. We will ask EPA to confirm our view and we will review the other exemption possibilities outlined in your letters before making a final determination.

Since your Title V application is due to our District office by June 15, we propose that you list the air construction permits to include the sulfur dioxide limits as applicable requirements on your Title V application, provide information as required by rule for any other emissions and submit a letter with your Title V application requesting that the Title V permit not be issued until we resolve the preconstruction review issue.

If you have any questions regarding the preconstruction review issue, please contact Al Linero at (904)488-1344. On matters related to this particular Title V issue, please contact John Brown at the same number.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. H. Fancy".

C. H. Fancy, Chief
Bureau of Air Quality

CHF/aal/l

cc: J. Harper, EPA
J. Bunyak, NPS
C. Kirts, NED
J. Manning, RESD
P. Comer, OGC
J. Braswell, OGC
J. Brown, BAR
M. Harley, BAMMS
S. Chandnani, Rust E&I
A. Morrison, HGSS

1997/10/22

WOSH, Woshke, H/len (Union Camp)

Plant # 0070

Emissions in Tons

PAGE 2

ID: 904 630 3638

DEPT. + ENV. REG.

FROM: 13:58

Y-01-95

13:58

3SUM.94

Source	Source #
Incinerator ⁽²⁾	01
Boiler # 2	03 liquid gas
Boiler # 3	14 gas
Myrcene Unit A	26
Myrcene Unit B ⁽³⁾	04
Myrcene Unit C ⁽³⁾	05
Myrcene Unit D	06
Dist. columns 10-90	17
A-580 Reactor	15
Phase II, Part I Expansion	18
31 tanks vented to air	08
Tank 521 (vented to air)	20
11 tanks vented to VCS	22
Tank 1020 (vented to VCS)	16
11 tanks (new 3&4)(vented to VCS)	34
Total	

CO	PM ¹	PM ₁₀ ⁽¹⁾	SO ₂	VOC	NO _x	TRS	Pb
0	0	0	0	0	0	0	0.0
2.3	1.38	0.5	150.6	0.09	9.2	0.09	0.0006
3.1	1.20	1.2	214.1	0.2	12.2	0.05	0
5.2	2.0	2.0	366.1	0.4	20.9	0.18	0
0.5	0.2	—	0.009	0.04	2.1	—	—
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0.14	0.08	—	0.007	0.0005	0.55	—	—
—	—	—	—	0	—	—	—
—	—	—	—	0	—	—	—
—	—	—	—	0	—	—	—
—	—	—	—	10.24	—	—	—
—	—	—	—	0.02	—	—	—
—	—	—	—	0	—	—	—
—	—	—	—	0	—	—	—
—	—	—	—	0	—	—	—
11.2	4.9	3.7	730.8	11.0	45.0	0.3	0.0006

Included in PM
 Did not operate
 No longer exists