



Jeb Bush
Governor

Department of Environmental Protection

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

FILE

David B. Struhs
Secretary

October 22, 2003

Ms. Denise R. St. Clair
Environmental Engineer
Solutia-Pensacola
PO Box 97
Gonzalez, FL 32560-0097

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP) - Site Remediation

Dear Ms. St. Clair:

The 112(j) notification that was submitted for Solutia last year indicated that Solutia may be subject to the NESHAP (40 CFR 63 Subpart GGGGG) for Site Remediation. You may be interested in knowing that the USEPA published the final NESHAP regulation for this source category in the Federal Register on October 8, 2003. Therefore, 112(j) requirements no longer apply to site remediation activities.

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/siterm/sitermpg.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 GGGGG standards by October 9, 2006. For the purposes of Subpart GGGGG, affected sources are "existing" if construction or reconstruction of the affected source commenced before July 30, 2002. For compliance dates for "new" affected sources, please refer to section 63.7883 of the standards.

Since it was also indicated in the 112(j) notification that Solutia may be subject to Subpart ZZZZ- Reciprocating Internal Combustion Engines, and Subpart DDDDD-I/C/I Boilers and Process Heaters, Solutia may be required to submit a 112(j) MACT Title V permit revision application by April 28, 2004 unless these proposed subparts are final by then.

Though they have not yet appeared in the federal register, the final standards for Subpart YYYY- Combustion Turbines have been signed. Therefore, combustion turbines are also no longer subject to 112(j) requirements.

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- Northwest District Office



Department of Environmental Protection

FILE

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 10, 2003

Mr. Norman Phillibert
Solutia-Pensacola
PO Box 97
Gonzalez, FL 32560-0097

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP) - Site Remediation

Dear Mr. Phillibert:

You indicated, in the 112(j) notification that was submitted last year, that Solutia may be subject to the NESHAP (40 CFR 63 Subpart GGGGG) for Site Remediation. You may be interested in knowing that the USEPA published the final NESHAP regulation for this source category in the Federal Register on October 8, 2003. Therefore, 112(j) requirements no longer apply to site remediation activities.

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/siterm/sitermpg.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.

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Since you also indicated in the 112(j) notification that Solution may be subject to Subpart ZZZZ-Reciprocating Internal Combustion Engines, and Subpart DDDDD-I/C/I Boilers and Process Heaters, you may be required to submit a 112(j) MACT Title V permit revision application by April 28, 2004 unless these proposed subparts are final by then.

Though they have not yet appeared in the federal register, the final standards for Subpart YYYY-Combustion Turbines, have been signed. Therefore, combustion turbines are also no longer subject to 112(j) requirements.

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- Northwest District Office

"More Protection, Less Process"

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RECEIVED

MAY 17 2002

BUREAU OF AIR REGULATION

Solutia Inc.
P.O. Box 97
Gonzalez, Florida 32560-0097
Tel/ 850-968-7000

May 15, 2002

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

Re: Permit 0330040-AV-002, 112(j) Notification Information

Dear Ms. Phillips:

As required by the Clean Air Act Section 112(j), enclosed is the notification information submittal for emission units we believe fall into the source categories (as published in the February 12, 2002 Federal Register) of yet to be finalized MACT standards. If you have any questions regarding this submittal please call Norman Phillibert at 850-968-7635.

Sincerely,

Joseph C. Ochsner
Plant Manager

Enclosure

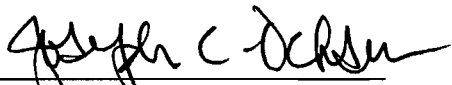
Cc: Ms. Sandra F. Veazey
Air Programs Administrator
Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501-5794

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

**Notification Information Submittal for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR §§ 63.50-63.56**

1. **Company Name:** Solutia Inc.
2. **Mailing Address:** P.O. Box 97
Gonzalez, FL 32560-0097
3. **Name of Major Source:** Solutia Pensacola Plant
4. **Location of Major Source:** 3000 Old Chemstrand Road, Cantonment, Florida
5. **Description of Major Source:** Manufacturer of nylon and various intermediate chemicals. Title V Permit: 0330040-002-AV
6. **Applicable Section 112 Source Category:** See Attachment.
7. **Types of sources belonging to the relevant source category present at the major source:** See Attachment.
8. **Affected sources at the major source for which a section 112(g) MACT determination has been made:** None
8. **Pursuant to 40 CFR 63.52(e)(2)(ii), this source requests a determination that the section 112(g) MACT determination made for the above referenced affected source(s) is substantially as effective as the emission limitations which would otherwise be adopted pursuant to section 112(j) for the source(s) in question.**
 Yes No
10. **Pursuant to 40 CFR 63.52(d)(1) and 63.52(e)(2)(i), this source requests FLDEP to determine whether the following sources belong in a category or subcategory for which the Administrator has failed to promulgate an emission standard under this part: (Identify the emissions units and the source category for which an applicability determination is requested.)** None

I certify, based on information and belief, formed after a reasonable inquiry that the above information is true, accurate, and complete.



Joseph C. Ochsner
Plant Manager
Responsible Official for Solutia Pensacola Plant

5/14/02

Date

Attachment
Applicable Section 112 Source Category(ies)
Notification Information Submittal for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56

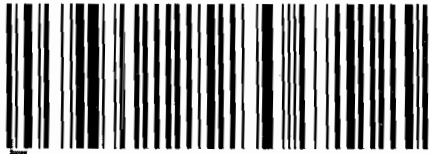
Instructions: Review all of the categories below. Check the box next to those categories for which the facility can reasonably determine that one or more sources at the major source belong in the category. For those checked categories, list the types of sources belonging to the relevant source category. The listing of the types of sources in the category does not require a detailed listing of the emissions units at the facility but rather a more general statement regarding the types of units that will be regulated under the particular category. NOTE: This list is based on several EPA publications regarding source categories that would be subject to Section 112(j) as of March 6, 2002. Please ensure that you consult EPA's website for the most current listing of Section 112(j) subject source categories prior to filing the Part 1 Application. EPA's website is located at www.epa.gov/ttn. You can obtain more information regarding the scope of the source categories listed below on EPA's website, [http://www.epa.gov/ttn/atw/112j/info/112\(j\)-table2.html](http://www.epa.gov/ttn/atw/112j/info/112(j)-table2.html). EPA is expected to issue a list of categories for which Part 1 Applications will be required close to May 15, 2002. That list should be consulted and compared with the list below to determine if any categories have been added to or removed from the list.

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Combustion Turbines	Yes <input checked="" type="checkbox"/>	Cogeneration EU 032
Engine Test Facilities and Rocket Testing Facilities	<input type="checkbox"/>	
Boilers and Process Heaters <ul style="list-style-type: none"> ▪ Industrial Boilers ▪ Institutional/Commercial Boilers ▪ Process Heaters 	<input checked="" type="checkbox"/> Yes	Boilers 4,5,6,7, 8 EUs 014,015,016,004,003 Vaporizers 1,2,3,4,5,6,7,8 EUs 005,007,008,009,010,011,013,075
Lightweight Aggregate	<input type="checkbox"/>	
Reciprocating Internal Combustion Engines	Yes <input checked="" type="checkbox"/>	408 Air compressors 2A,4C EU 006
Primary Copper Smelting	<input type="checkbox"/>	
Primary Magnesium Refining	<input type="checkbox"/>	
Coke Ovens: Pushing, Quenching and Battery Stacks	<input type="checkbox"/>	
Integrated Iron and Steel Manufacturing	<input type="checkbox"/>	
Iron Foundries	<input type="checkbox"/>	
Steel Foundries	<input type="checkbox"/>	
Asphalt Roofing Manufacturing and Asphalt Processing	<input type="checkbox"/>	
Asphalt/Coal Tar Application to Metal Pipes (subsumed with Misc. Metal Parts & Products)	<input type="checkbox"/>	
Brick and Structural Clay Products Manufacturing/Clay Minerals Processing	<input type="checkbox"/>	
Lime Manufacturing	<input type="checkbox"/>	

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
Refractories Manufacturing (formerly Chromium Refractories)	<input type="checkbox"/>	
Taconite Iron Ore Processing	<input type="checkbox"/>	
Organic Liquids Distribution (Non- Gasoline)	<input type="checkbox"/>	
Auto and Light Duty Truck (Surface Coating).	<input type="checkbox"/>	
Large Appliance (Surface Coating)	<input type="checkbox"/>	
Metal Can (Surface Coating)	<input type="checkbox"/>	
Metal Coil (Surface Coating)	<input type="checkbox"/>	
Metal Furniture (Surface Coating)	<input type="checkbox"/>	
Miscellaneous Metal Parts and Products (Surface Coating)	<input type="checkbox"/>	
Paper and Other Webs (Surface Coating).	<input type="checkbox"/>	
Plastic Parts and Products (Surface Coating)	<input type="checkbox"/>	
Printing, Coating, and Dyeing of Fabrics.	<input type="checkbox"/>	
Wood Building Products (Surface Coating) (formerly Flat Wood Paneling)	<input type="checkbox"/>	
Municipal Solid Waste Landfills	<input type="checkbox"/>	
Site Remediation	Yes <input checked="" type="checkbox"/>	Air sparging soil vapor extraction activity
Vegetable Oil Production	<input type="checkbox"/>	
Cellulose Production Manufacturing <ul style="list-style-type: none"> ▪ Cellulose Ethers Production ▪ Caroxymethylcellulose Production ▪ Cellulose Ethers Production ▪ Cellulose Food Casing Manufacturing ▪ Cellophane Production ▪ Methylcellulose Production ▪ Rayon Production 	<input type="checkbox"/>	
Miscellaneous Organic NESHAP <ul style="list-style-type: none"> ▪ Alkyd Resins Production ▪ Ammonium Sulfate Production--Caprolactam By-Product Plants ▪ Maleic Anhydride Copolymers Production ▪ Manufacture of Paints, Coatings and Adhesives ▪ Polyester Resins Production ▪ Polymerized Vinylidene Chloride Production ▪ Polymethyl Methacrylate Resins Production ▪ Polyvinyl Acetate Emulsions Production ▪ Polyvinyl Alcohol Production ▪ Polyvinyl Butyral Production ▪ Benzyltrimethylammonium Chloride Production ▪ Carbonyl Sulfide Production ▪ Chelating Agents Production ▪ Chlorinated Paraffins Production ▪ Ethylidene Norbornene Production ▪ Explosives Production ▪ Hydrazine Production ▪ OBPA/1,3-Diisocyanate Production ▪ Photographic Chemicals Production 	<input type="checkbox"/>	

Category	Applicable?	Types of sources belonging to the relevant source category (provide a general description of the types of units regulated under this source category; note this does not require a listing of all emissions units at the facility.)
<ul style="list-style-type: none"> ▪ Phthalate Plasticizers Production ▪ Rubber Chemicals Manufacturing ▪ Symmetrical Tetrachloropyridine Production ▪ Quaternary Ammonium Compounds Production 		
Polyvinyl Chloride and Copolymers Production	<input type="checkbox"/>	
Reinforced Plastic Composites Production	<input type="checkbox"/>	
Generic MACT Categories Carbon Black Production Spandex Production Cyanide Chemicals Manufacturing Ethylene Processes	<input type="checkbox"/>	
Mercury Cell Chlor-Alkali Plants (Formerly Chlorine Production)	<input type="checkbox"/>	
Hydrochloric Acid Production and Fumed Silica Production	<input type="checkbox"/>	
Flexible Polyurethane Foam Fabrication Operations	<input type="checkbox"/>	
Friction Materials Manufacturing	<input type="checkbox"/>	
Miscellaneous Viscose Processes	<input type="checkbox"/>	
Paint Stripping Operations	<input type="checkbox"/>	
Plywood and Composite Wood Products (formerly Plywood and Particle Board Manufacturing)	<input type="checkbox"/>	
Rubber Tire Manufacturing	<input type="checkbox"/>	
Semiconductor Manufacturing	<input type="checkbox"/>	
Wet-Formed Fiberglass Mat Production	<input type="checkbox"/>	

CERTIFIED MAIL



7099 3400 0016 6162 3614

ntia Inc.
Box 97
Tallahassee, Florida 32360-0097



SOLUTIA

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

32399+2400 01





Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

May 20, 2002

Mr. Joseph C. Ochsner
Plant Manager
Solutia, Inc.
P.O. Box 97
Gonzalez, Florida 32560-0097

Re: 112(j) Notification Information Submittal

Dear Mr. Ochsner:

Thank you for submitting the referenced information in your letter dated May 15, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although the attachment to your letter refers to this information submittal as a "Part 1 Section 112(j) Application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

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

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