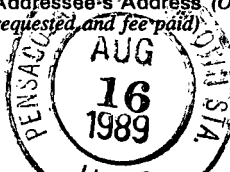


**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

<b>3. Article Addressed to:</b> Mr. Philip P. Ulichney Plant Manager Reichhold Chemicals, Inc. P.O. Box 1433 Pensacola, FL 32596-1433	<b>4. Article Number</b> P 938 762 648  <b>Type of Service:</b> <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
Always obtain signature of addressee or agent and <b>DATE-DELIVERED</b> .	
<b>5. Signature — Address</b> X	<b>8. Addressee's Address (ONLY if requested and fee paid)</b> 
<b>6. Signature — Agent</b> X <i>[Signature]</i>	
<b>7. Date of Delivery</b>	

PS Form 3811, Mar. 1988

\* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT

P 938 762 648

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to	
Mr. Philip P. Ulichney,	
Street and No.	Reichhold
P.O. Box 1433	
P.O., State and ZIP Code	
Pensacola, FL 32596-1433	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 8-15-89	
Permit: AC 17-153303	

PS Form 3800, June 1985



# *Florida Department of Environmental Regulation*

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 10, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Philip P. Ulichney  
Plant Manager  
Reichhold Chemicals, Inc.  
P. O. Box 1433  
Pensacola, Florida 32596-1433

Dear Mr. Ulichney:

Re: Modification of Permit No. AC 17-153303

The above permit is amended as stated below to extend the compliance testing period as requested in your letter dated July 13, 1989:

Present Specific Condition No. 5:

5. The compliance tests shall be conducted within 30 days after the modified boiler is placed in operation and the results reported to the Department's Northwest District office within 45 days of testing. A DER form 17-1.202(3), certificate of completion of construction, shall be submitted therewith. The Department's Northwest District office shall be notified at least 15 days prior to the compliance tests and at least 5 days prior to the boiler being placed in operation.

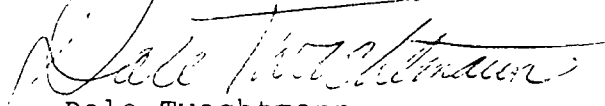
New Specific Condition No. 5:

5. The compliance tests shall be conducted within six months after the modified boiler is placed in operation and the results reported to the Department's Northwest District office within 45 days of testing. A DER form 17-1.202(3), certificate of completion of construction, shall be submitted therewith. The Department's Northwest District office shall be notified at least 15 days prior to the compliance tests and at least 5 days prior to the boiler being placed in operation.

August 10, 1989  
Page 2

The amendment letter shall become attachment No. 2 to your construction permit AC 17-153303.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dale Twachtmann", written over a horizontal line.

Dale Twachtmann  
Secretary

DT/plm

cc: E. Middleswart - N.W. District



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: Dale Twachtmann  
 FROM: Steve Smallwood *by SSS*  
 DATE: August 10, 1989  
 SUBJ: Modification of Permit  
 Reichhold Chemicals, Inc.

*Please call  
 Patty Adams  
 when signed  
 8-1344*

Attached for your approval and signature is a letter modifying the compliance test period for the above company's modified boiler. The company has experienced difficulties with testing equipment.

I recommend your approval and signature.

SS/JR/t

attachment

*[Handwritten mark]*  
 AUG 14 1989

Office of the Secretary

**Reichhold Chemicals, Inc.**

Coating Polymers & Resins Division  
407 South Pace Boulevard  
P.O. Box 1433  
Pensacola, Florida 32596-1433

**REICHHOLD**

July 13, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

C.H. Fancy, PE  
Deputy Chief  
Bureau of Air Quality Management  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED  
JUL 17 1989  
DER-BAQM

RE: Construction Permit # AC 17-153303

Dear Mr. Fancy,

The modifications to the boiler were completed and a trail run on dimer oil was performed in June. The stack analyzer equipment did not operate properly. It is believed that faulty equipment was supplied. RCI is currently working with the vendor to correct the problems.

RCI is requesting an extension on condition #5 on the construction permit which states that a "compliance test shall be conducted within 30 days after the modified boiler is placed in operation and the results reported to the Department's Northwest District office within 45 days of testing".

Due to faulty analyzer a 90 day extension on the compliance testing is requested.

Sincerely,



Philip P. Ulichney  
Plant Manager

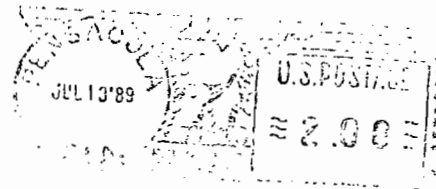
PPU/kc

cc: E. Middleswart, NW District  
D.W. Bright  
M.G. Long

*J. Reynolds*  
CAF/ST

Tel.: (904) 433-7621  
(800) 874-0868  
FAX: (904) 433-3655  
Telex: 702424

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
407 South Pace Boulevard  
P.O. Box 1433  
Pensacola, Florida 32596-1433



**CERTIFIED**  
P 743 642 713  
**MAIL**

C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**REICHHOLD**

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
 C. K. Miller, Plant Mgr.  
 Reichhold Chemicals, Inc.  
 407 South Pace Blvd.  
 Pensacola, FL 32596-1433

4. Article Number  
 P 274 007 572

Type of Service:  
 Registered       Insured  
 Certified       COD  
 Express Mail       Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address  
 X

6. Signature - Agent  
 X *J. Hart*

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

**U.S. POSTAL SERVICE**  
**1989**  
**MOBILE, AL**

PS Form 3811, Mar. 1988      \* U.S.G.P.O. 1988-212-865      DOMESTIC RETURN RECEIPT

P 274 007 572

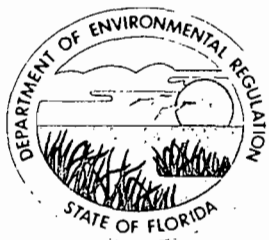
**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985  
 \* U.S.G.P.O. 1985-480-794

C. K. Miller, Plant Mgr.	
Reichhold Chemicals, Inc.	
407 South Pace Blvd.	
Pensacola, FL 32596-1433	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
AC 17-153303	
mailed: 2/2/89	



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. C. K. Miller, Plant Manager  
Reichhold Chemicals, Inc.  
407 South Pace Blvd.  
Pensacola, FL 32596-1433

February 2, 1989

Enclosed is construction permit No. AC 17-153303 for Reichhold Chemicals, Inc. to modify Boiler No. 11 at your Pensacola facility. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management

Copy furnished to:

E. Middleswart, NW District  
D. B. Smith, Baskerville-Donovan



CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on February 2, 1989.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Roby Carter  
Clerk

2-2-89  
Date

Final Determination

Reichhold Chemicals, Inc.  
Escambia County  
Pensacola, Florida

Modification of Boiler No. 11  
Permit No. AC 17-153303

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

January 31, 1989

## Final Determination

The construction permit application has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in the Pensacola News Journal on December 16, 1988. The Technical Evaluation and Preliminary Determination were available for public inspection at the DER's Northwest District office in Pensacola and the Bureau of Air Quality Management in Tallahassee.

No comments were received during the public notice period. The final action of the Department will be to issue the construction permit as drafted.



PUBLISHED DAILY  
PENSACOLA, ESCAMBIA COUNTY, FLORIDA

RECEIVED

State of Florida,  
County of Escambia.

JAN 14 1988

DER-BAQM

Before the undersigned authority personally appeared

J Diane Deal

who on oath says that she is Legal Advertising Supervisor of the Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

[Signature]

in the \_\_\_\_\_ Court.

was published in said newspaper in the issues of \_\_\_\_\_

Dec 16, 1987

Affiant further say that the said The Pensacola News Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida, each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

[Signature]

Sworn to and subscribed before me this \_\_\_\_\_

day of \_\_\_\_\_, A.D., 19 \_\_\_\_\_

[Signature]

NOTARY PUBLIC.

My Comm. No. \_\_\_\_\_

State of Florida  
Department of  
Environmental  
Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Reichhold Chemicals Inc. for the modification of the No. 11 Boiler located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to waive of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida  
32399-2400

Dept. of Environmental Regulation  
Northwest District  
106 Governmental Center  
Pensacola, Florida  
32501-5794

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Legal No. 35390 1T  
Dec 16, 1988



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

Reichhold Chemicals, Inc.  
407 S. Pace Blvd.  
P. O. Drawer 1433  
Pensacola, FL 32596

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990  
County: Escambia  
Latitude/Longitude: 30° 24' 30"N  
87° 14' 45"W  
Project: Modification of Boiler  
No. 11

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named 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:

For the modification of a steam boiler (No. 11) located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida. The permittee is allowed to burn either natural gas or dimer oil as specified in the permit application.

Construction shall be in accordance with the permit application and plans, documents, and reference material submitted unless otherwise stated in the Preliminary Determination and Technical Evaluation or the General and Specific Conditions herein.

**Attachments:**

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-1.202(1) received August 10, 1988.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. A description of and cause of non-compliance; and
- b. The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.



PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. 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 that 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 submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. This permit replaces current operating permit AO 17-119127. The permittee shall return this operating permit to the Department's Northwest District office within 30 days after the modified boiler begins operation.
2. The modification and operation of this source shall be in accordance with the capacities and specifications stated in the application.
3. Visible emissions shall not be greater than 20% opacity in accordance with F.A.C. Rule 17-2.600(6)(a), and compliance shall be demonstrated at 90-100% of maximum permitted capacity using DER Method 9, in accordance with F.A.C. Rule 17-2.700.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**SPECIFIC CONDITIONS:**

4. Total VOC emissions shall not exceed 0.68 lb/hr or 2.99 TPY. A compliance test for total VOC emissions shall be conducted at 90-100% of maximum permitted capacity using EPA Method 25 or 25A as described in 40 CFR 60.

5. The compliance tests shall be conducted within 30 days after the modified boiler is placed in operation and the results reported to the Department's Northwest District office within 45 days of testing. A DER form 17-1.202(3), certificate of completion of construction, shall be submitted therewith. The Department's Northwest District office shall be notified at least 15 days prior to the compliance tests and at least 5 days prior to the boiler being placed in operation.

6. The modified boiler shall be fired either by natural gas or dimer oil as specified in the application at a maximum rate of 33.5 MMBtu/hr for up to 8760 hours per year.

7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

8. An application for an operation permit must be submitted to the DER's Northwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit an application, the appropriate fee, certification that construction was completed, noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).

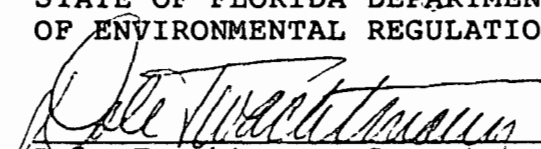
PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

Issued this 31 day of January,  
1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
Dale Twachtmann, Secretary

Best Available Control Technology (BACT) Determination  
Reichhold Chemicals, Inc.  
Escambia County

The applicant plans to modify a 33.5 MMBtu/hr steam boiler at their facility in Pensacola, Florida. The boiler will be fired with either natural gas or dimer oil as specified in the permit application and is scheduled to operate 8760 hours per year.

This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Requested by the Applicant:

The applicant did not request a BACT Determination.

BACT Determination by DER:

The amount of particulate and sulfur dioxide emissions emitted from the modified boiler shall be limited by the firing of natural gas or dimer oil containing no more than 0.32 percent sulfur by weight.

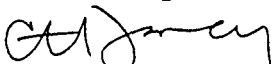
BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern, in that most of the fuel sulfur becomes SO<sub>2</sub> and particulate emissions from fuel burning are related to the sulfur content. The firing of natural gas or dimer oil containing no more than 0.32 percent sulfur shall be BACT for the modified boiler.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Recommended by:

  
C. H. Fancy, P.E., Deputy Bureau Chief

January 30, 1989  
Date

Approved by:

  
Dale Twachtmann, Secretary

1 Feb., 1989  
Date



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: Dale Twachtmann

FROM: Steve Smallwood 

SUBJ: Approval of Construction Permit No. AC 17-153303  
Reichhold Chemicals, Inc.

DATE: January 31, 1989

Attached for your approval and signature is a permit prepared by Central Air Permitting for the above mentioned company to burn an alternate fuel in Boiler No. 11.

No comments were received during the public notice period:

Day 90, after which this permit will be issued by default, is February 12, 1989.

I recommend your approval and signature.

SS/JR/s

Attachments

**RECEIVED**  
JAN 30 1989

Office of the Secretary



316 S. BAYLEN ST., SUITE 300  
 P.O. BOX 13370, PENSACOLA, FL 32591  
 (904) 438-9661

# LETTER OF TRANSMITTAL

DATE	Jan 18, 1989	JOB NO.	77301
ATTENTION	Mr. Clair Fancy		
RE:	Reichhold Chemicals, Inc.		

TO Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399

GENTLEMEN:

WE ARE SENDING YOU  Attached  Under separate cover via \_\_\_\_\_ the following items:

- Shop drawings     Prints     Plans     Samples    -     Specifications  
 Copy of letter     Change order     \_\_\_\_\_

COPIES	DATE	NO.	DESCRIPTION
1			Proof of Publication - Permit to Modify No. 11 Boiler DER File No. AC 17-153303

THESE ARE TRANSMITTED as checked below:

- For approval     Approved as submitted     Resubmit \_\_\_\_\_ copies for approval  
 For your use     Approved as noted     Submit \_\_\_\_\_ copies for distribution  
 As requested     Returned for corrections     Return \_\_\_\_\_ corrected prints  
 For review and comment     \_\_\_\_\_  
 FOR BIDS DUE \_\_\_\_\_ 19 \_\_\_\_\_     PRINTS RETURNED AFTER LOAN TO US

REMARKS \_\_\_\_\_

**RECEIVED**

JAN 19 1989

DER - BAQM

COPY TO \_\_\_\_\_

SIGNED \_\_\_\_\_

Daniel B. Smith, P.E.  
 Mgr., Industrial Dept.

If enclosures are not as noted, kindly notify us at once.

ment of Administration,  
2009 Apalachee Park-  
way, Tallahassee, Florida  
32301. If no hearing offi-  
cer has been assigned,  
the petition is to be filed  
with the Department's  
Office of General Coun-  
sel, 2600 Blair Stone  
Road, Tallahassee, Flor-  
ida 32399-2400. Failure  
to waiver of any right,  
such person has to re-  
quest a hearing under  
Section 120.57, Florida  
Statutes.

The application is  
available for public in-  
spection during normal  
business hours, 8:00 a.m.  
to 5:00 p.m., Monday  
through Friday, except  
legal holidays, at:

Dept. of Environmental  
Regulation  
Bureau of Air  
Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida  
32399-2400

Dept. of Environmental  
Regulation  
Northwest District  
106 Governmental  
Center  
Pensacola, Florida  
32501-5794

Any person may send  
written comments on the  
proposed action to Mr.  
Bill Thomas at the De-  
partment's Tallahassee  
address. All comments  
mailed within 14 days of  
the publication of this  
notice will be considered  
in the Department's final  
determination.

Legal No. 35390 1T  
Dec. 16, 1988

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PENSACOLA  
**News Journal**

PUBLISHED DAILY  
PENSACOLA, ESCAMBIA COUNTY, FLORIDA

RECEIVED

JAN 19 1989

State of Florida,  
County of Escambia.

DER-BAQM

Before the undersigned authority personally appeared

J. Diane Deal

who on oath says that she is Legal Advertising Supervisor of the Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

Patent

\_\_\_\_\_ in the \_\_\_\_\_ Court,

was published in said newspaper in the issues of \_\_\_\_\_

Dec. 16, 1988

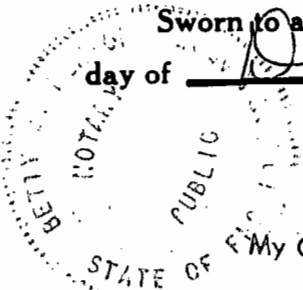
Affiant further say that the said The Pensacola News Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida, each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

J. Diane Deal

Sworn to and subscribed before me this \_\_\_\_\_

day of Dec., A.D., 1988

Drury J. Fester  
NOTARY PUBLIC.



State of Florida  
Department of  
Environmental  
Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Reichhold Chemicals Inc. for the modification of the No. 11 Boiler located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

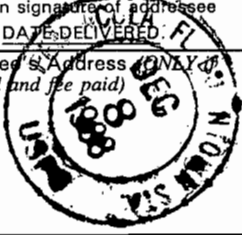
Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Depart-



**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge) 2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  Mr. C. K. Miller Plant Manager Reichhold Chemicals, Inc. 407 South Pace Blvd. Pensacola, Florida 32596	4. Article Number P 274 007 525  Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise  Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid) 
6. Signature - Agent X <i>Richard Loyd</i>	
7. Date of Delivery	

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 274 007 525  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

\* U.S.G.P.O. 1985-480-794

Sent to <b>Mr. C. K. Miller, Reichhold Chem.</b>	
Street and No. <b>407 S. Pace Blvd.</b>	
P.O., State and ZIP Code <b>Pensacola, FL 32596</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 12-7-88 Permit: AC 17-153303	

PS Form 3800, June 1985



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 6, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. K. Miller  
Plant Manager  
Reichhold Chemicals, Inc.  
407 South Pace Blvd.  
Pensacola, Florida 32596

Dear Mr. Miller:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify the No. 11 boiler at your facility in Pensacola, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/ks

Attachments

cc: Daniel B. Smith, P.E.  
Ed Middleswart, NW District

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Reichhold Chemicals Inc. for the modification of the No. 11 Boiler located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation  
Northwest District  
106 Governmental Center  
Pensacola, Florida 32501-5794

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Reichhold Chemicals, Inc.  
407 South Pace Blvd.  
Pensacola, Florida 32596

---

DER File No. AC 17-153303

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Reichhold Chemicals Inc., applied on August 10, 1988, to the Department of Environmental Regulation for a permit to modify the No. 11 Boiler to burn an alternate fuel. The proposed modification will be located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

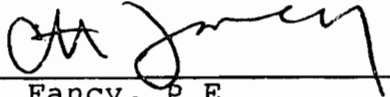
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the

Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirements of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

C. K. Miller, Reichhold Chemicals, Inc.  
Daniel B. Smith, P.E.  
E. Middleswart, Northwest District

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on December 7, 1988.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Martha Jane Wise  
Clerk

December 7, 1988  
Date



Technical Evaluation  
and  
Preliminary Determination

Reichhold Chemicals, Inc.  
Pensacola, Escambia County, Florida

Permit Number:  
AC 17-153303

Modification of Boiler No. 11

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

November 30, 1988

I. Application

A. Applicant

Reichhold Chemicals, Inc.  
407 South Pace Boulevard  
Pensacola, Florida 32596

B. Processing Schedule

Date of receipt of application: August 10, 1988  
Completeness date: September 20, 1988

III. Facility Information

A. Location

The air pollution source, identified as Boiler No. 11, is located at the Reichhold Chemical complex, building 137-1, 407 South Pace Boulevard in Pensacola, Escambia County, Florida. The latitude and longitude coordinates are 30° 24' 30" North and 87° 14' 45" West, respectively.

B. Standard Industrial Classification Code (SIC)  
and Standard Classification Code (SCC)

This facility is classified as follows:

Major Group No. 28 - Chemicals and Allied Products.

Industry Group No. 282 - Plastics Materials and Synthetic Resins, Synthetic Rubber, Cellulosic and other manmade fibers, except glass.

Industry No. 2821 - Plastics.

SCC for Boiler No. 11 is 1-02-006-02.

C. Facility Category

Reichhold Chemicals, Inc. is classified as a major emitting facility for particulate matter (PM) and volatile organic compounds (VOC).

III. Project Description/Emissions

The application is for modification of an existing process steam boiler (No. 11) presently permitted to fire natural gas only. The proposed project involves the installation of equipment and controls for burning a blend of byproduct distillate and residue oil in the existing boiler. The oil, produced on site, contains hydrocarbons derived from the

applicant's limonene process. Present in the byproduct oil are the following:

1. Limonene residue consisting of C10 alcohols and ketones.
2. Paracymene (benzene derivative).
3. Dimer oil (mixture of polymerized dipentenes).
4. Phenols (approx. 2% by volume).
5. Toluene (approx. 2.6% by volume).
6. Ethyl Benzene (less than 0.1% by volume).
7. DDT/Pesticides (trace-400 to 700 PPB).

According to the applicant, the byproduct oil yields combustion products in amounts similar to those from fuel oil. The applicant also stated that the byproduct oil was tested by the boiler manufacturer who verified that standard fuel oil burner controls will provide stoichiometric air ratios necessary for efficient combustion.

Assuming a conservative destruction and removal efficiency of at least 98 percent for the non-fuel constituents, stack gas concentrations will be equal to or less than the occupational threshold limit values for these chemicals. Therefore, it is reasonable to conclude, without air modeling, that ambient air concentrations resulting from this project will not exceed ambient air quality standards.

Potential emissions are tabulated below:

	<u>Current</u>	<u>Proposed</u>	<u>Increase</u>
NOx	4.69 lbs/hr (20.50 TPY)	13.60 lbs/hr (59.61 TPY)	8.91 lbs/hr (39.1 TPY)
SO2	0.02 lb/hr (0.09 TPY)	0.11 lb/hr (0.83 TPY)	0.09 lb/hr (0.74 TPY)
VOC	--	0.68 lb/hr (2.99 TPY)	0.68 lb/hr (2.99 TPY)
CO	--	0.68 lb/hr (2.98 TPY)	0.68 lb/hr (2.98 TPY)
PM	0.10 lb/hr (0.44 TPY)	3.91 lbs/hr (17.14 TPY)	3.81 lb/hr (16.70 TPY)

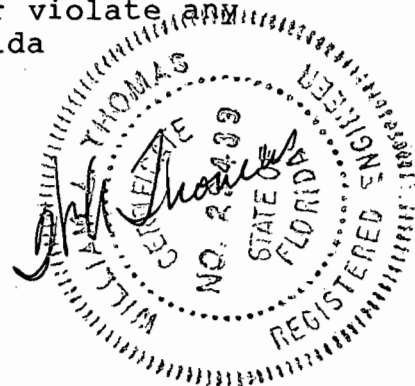
#### IV. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The facility is located in an

area classified as "attainment" for ozone and particulate matter and as "unclassifiable" for the pollutant sulfur dioxide. Applicable rules are F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, and F.A.C. Rule 17-2.600(6), Fossil Fuel Steam Generators with less than 250 million Btu per hour heat input.

V. Conclusion

Based on the information provided by the applicant, the Department has reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any ambient air quality standard or PSD increment or violate any other technical provisions of Rule 17-2 of the Florida Administrative Code.





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

Reichhold Chemicals, Inc.  
407 S. Pace Blvd.  
P. O. Drawer 1433  
Pensacola, FL 32596

**Permit Number:** AC 17-153303

**Expiration Date:** December 31, 1990

**County:** Escambia

**Latitude/Longitude:** 30° 24' 30"N  
87° 14' 45"W

**Project:** Modification of Boiler  
No. 11

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named 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:

For the modification of a steam boiler (No. 11) located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida. The permittee is allowed to burn either natural gas or dimer oil as specified in the permit application.

Construction shall be in accordance with the permit application and plans, documents, and reference material submitted unless otherwise stated in the Preliminary Determination and Technical Evaluation or the General and Specific Conditions herein.

**Attachments:**

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-1.202(1) received August 10, 1988.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. A description of and cause of non-compliance; and
- b. The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.



PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. 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 that 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 submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. This permit replaces current operating permit AO 17-119127. The permittee shall return this operating permit to the Department's Northwest District office within 30 days after the modified boiler begins operation.

2. The modification and operation of this source shall be in accordance with the capacities and specifications stated in the application.

3. Visible emissions shall not be greater than 20% opacity in accordance with F.A.C. Rule 17-2.600(6)(a), and compliance shall be demonstrated at 90-100% of maximum permitted capacity using DER Method 9, in accordance with F.A.C. Rule 17-2.700.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

**SPECIFIC CONDITIONS:**

4. Total VOC emissions shall not exceed 0.68 lb/hr or 2.99 TPY. A compliance test for total VOC emissions shall be conducted at 90-100% of maximum permitted capacity using EPA Method 25 or 25A as described in 40 CFR 60.

5. The compliance tests shall be conducted within 30 days after the modified boiler is placed in operation and the results reported to the Department's Northwest District office within 45 days of testing. A DER form 17-1.202(3), certificate of completion of construction, shall be submitted therewith. The Department's Northwest District office shall be notified at least 15 days prior to the compliance tests and at least 5 days prior to the boiler being placed in operation.

6. The modified boiler shall be fired either by natural gas or dimer oil as specified in the application at a maximum rate of 33.5 MMBtu/hr for up to 8760 hours per year.

7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

8. An application for an operation permit must be submitted to the DER's Northwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit an application, the appropriate fee, certification that construction was completed, noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-153303  
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

Best Available Control Technology (BACT) Determination  
Reichhold Chemicals, Inc.  
Escambia County

The applicant plans to modify a 33.5 MMBtu/hr steam boiler at their facility in Pensacola, Florida. The boiler will be fired with either natural gas or dimer oil as specified in the permit application and is scheduled to operate 8760 hours per year.

This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Requested by the Applicant:

The applicant did not request a BACT Determination.

BACT Determination by DER:

The amount of particulate and sulfur dioxide emissions emitted from the modified boiler shall be limited by the firing of natural gas or dimer oil containing no more than 0.32 percent sulfur by weight.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern, in that most of the fuel sulfur becomes SO<sub>2</sub> and particulate emissions from fuel burning are related to the sulfur content. The firing of natural gas or dimer oil containing no more than 0.32 percent sulfur shall be BACT for the modified boiler.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blainstone Road  
Tallahassee, Florida 32399-2400

Recommended by:

\_\_\_\_\_  
C. H. Fancy, P.E., Deputy Bureau Chief      Date \_\_\_\_\_ 1988

Approved by:

\_\_\_\_\_  
Dale Twachtman, Secretary      Date \_\_\_\_\_ 1988



7615124736

BEST AVAILABLE COPY

*file copy*

CUSTOMER PACKAGE TRACKING NUMBER - PULL UP PURPLE TAB

**PENSACOLA - DONOVAN ENGINEERS, INC.**



A PROFESSIONAL SERVICE ORGANIZATION

• PENSACOLA • TALLAHASSEE • FORT WALTON BEACH •  
MILTON • PORT ST. JOE • PANAMA CITY • APALACHICOLA • DAYTONA BEACH

September 19, 1988

"Federal Express"

Mr. C.H. Fancy, P.E.  
Bureau of Air Quality Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399

RE: Reichhold Chemicals, Inc.  
Proposed Modification  
No. 11, AC17-153303  
Our Project No. 77301

**RECEIVED**

**SEP 20 1988**

**DER-BAQM**

Dear Mr. Fancy:

In reply to the request for additional information contained in your letter to me dated September 7, 1988:

1. My response to Item F.2. on page 3 of the application was "no", inasmuch as it is my experience that industry standard, combustion control devices do not fall under the categorization of "Best Available Control Technology". As an example, I would cite the original application for construction of the boiler (dated 4/14/86) and several other boiler applications I am familiar with.

The modifications to Boiler No. 11 will include a proven fuel oil-to-air ratio control system. This system continuously monitors air flow, and adjusts the fuel oil flow to meet stoichiometric conditions and excess air percentages desired. Once set, this equipment has many years of proven performance on installations in this state and nationwide. In my experience and in actual practice on boilers, the fuel oil-to-air ratio, control system is the best method to achieve clean combustion and conform to the stack discharge limits for boilers.

Whether this equipment is BACT or not is a matter of interpretation. I feel BACT refers to scrubbers, fabric filters, or other post process devices. I personally would not classify fuel oil-to-air ratio control systems as BACT and it seems FDER has not made such a classification in the past.

2. Please modify Section C on page 4 of 12 of the application, which now reads "30 percent" to read instead as follows:

Mr. C.H. Fancy  
September 19, 1988  
Page two

BASKERVILLE-DONOVAN ENGINEERS, INC.

"Visible emissions will not exceed a density of Number 1 on the Ringelmann Chart (20% opacity.) A density of 40% opacity may be experienced for not more than two minutes in any one hour. This higher, but short duration, opacity may occur with cold boiler start-up."

This conforms to 17-2.600(5)(b)(6.a). A reference to 30% was for a specific boiler noted as such in the RegFiles. The change in wording will correct the information on the Application for Construction for this boiler modification.

3. A full chemical analysis of the fuel oil is attached for your information.

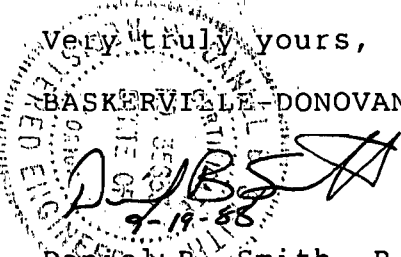
I appreciate your review of this application. As a matter of communications, I request that additional correspondence be addressed to:

Mr. Tom Keyser  
Reichhold Chemicals, Inc.  
Post Office Box 1433,  
Pensacola, Florida 32496

with a carbon copy to me. If you have any questions, I can be reached at (904) 438-9661. Again, thank you for your assistance in this matter.

Very truly yours,

BASKERVILLE-DONOVAN ENGINEERS, INC.

  
Daniel B. Smith, P.E.  
Manager, Industrial Department

DBS/alk

c - Tom Keyser  
David Bright

*copied: John Reynolds  
Barry Andrews  
Jack Bruce, NW Dist.  
CAF/BT*



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICAL  
17002 P.O. BOX 1433  
PENSACOLA FL 32596-0000

Lab I.D.#: 88-1857  
Order Number: P12984  
Order Date: 05/31/88  
Sampled By: N/S  
Sample Date: N/S  
Sample Time: N/S

Project Number: 88-1857  
Project Name: REICHOLD CHEMICAL  
Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

N/S = Not Submitted

## R E S U L T S

reported on the following page(s)

Comments: PPM = Parts Per Million, mg/l; PPB = Parts Per Billion, ug/l;  
Method Reference: SW-846, 3rd Edition, November 1986; BDL =  
Below Detection Limits.

Approved By : W. F. Bowers

page 1



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOOLD CHEMICAL  
17002

Lab I.D.#: 88-1857-1  
Order Date: 05/31/88  
Sampled By: N/S

Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

Sample ID.: BOILER FUEL

Sample Date: N/S

Time: N/S

PP/METALS+P&C

PP/METALS + PHENOL & CYANIDE

Parameter	Units	Result	Detection Limit
SILVER	MG/KG	0.69	0.09
ARSENIC	PPM	BDL	86
BERYLLIUM	PPM	BDL	8.6
CADMIUM	PPM	BDL	8.6
CHROMIUM	PPM	BDL	8.6
COPPER	PPM	10	8.6
CYANIDE, TOTAL	PPM	BDL	0.25
MERCURY	PPM	0.09	0.001
NICKEL	PPM	BDL	43
LEAD	PPM	BDL	43
PHENOLS, TOTAL	PPM	2350	0.5
ANTIMONY	PPM	BDL	43
SELENIUM	PPM	BDL	172
THALLIUM	PPM	BDL	344
ZINC	PPM	43	8.6





11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICAL  
17002

Lab I.D.#: 88-1857-1  
Order Date: 05/31/88  
Sampled By: N/S

Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

Sample ID.: BOILER FUEL Sample Date: N/S Time: N/S

PP/ACID/WATER

PP ACID EXTRACTABLES

Parameter	Units	Result	Detection Limit
P-CHLORO-M-CRESOL	PPM	BDL	2500
PENTACHLOROPHENOL	PPM	BDL	3000
PHENOL	PPM	19400	500
2,4,6-TRICHLOROPHENOL	PPM	BDL	2000
2,4-DICHLOROPHENOL	PPM	BDL	1000
2,4-DIMETHYLPHENOL	PPM	BDL	500
2,4-DINITROPHENOL	PPM	BDL	3000
2-CHLOROPHENOL	PPM	BDL	1500
2-NITROPHENOL	PPM	BDL	1000
4,6-DINITRO-O-CRESOL	PPM	BDL	5000
4-NITROPHENOL	PPM	BDL	2000



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICAL  
17002

Lab I.D.#: 88-1857-1  
Order Date: 05/31/88  
Sampled By: N/S

Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

Sample ID.: BOILER FUEL Sample Date: N/S Time: N/S

PP/BASE/WATER

PP BASE/NEUTRAL EXTRACTABLES

Parameter	Units	Result	Detection Limit
ACENAPHTHENE	PPM	BDL	1000
ACENAPHTHYLENE	PPM	BDL	1000
ANTHRACENE	PPM	BDL	1000
BENZIDINE	PPM	BDL	1000
BENZO(A)ANTHRACENE	PPM	BDL	1000
BENZO(A)PYRENE	PPM	BDL	1000
BENZO(GHI)PERYLENE	PPM	BDL	1000
BENZO(K)FLUORANTHANE	PPM	BDL	1000
BIS(2-CHLOROETHOXY) METHANE	PPM	BDL	1000
BIS(2-CHLOROETHYL)ETHER	PPM	BDL	1000
BIS(2-CHLOROISOPROPYL)ETHER	PPM	BDL	1000
BIS(2-ETHYLHEXYL) PHTHALATE	PPM	BDL	1000
BUTYLBENZYL PHTHALATE	PPM	BDL	1000
CHRYSENE	PPM	BDL	1000
DIBENZO(A,H)ANTHRACENE	PPM	BDL	2500
DIETHYL PHTHALATE	PPM	BDL	1000
DIMETHYL PHTHALATE	PPM	BDL	1000
DI-N-BUTYL PHTHALATE	PPM	BDL	1000
DI-N-OCTYL PHTHALATE	PPM	BDL	1000
FLUORANTHENE	PPM	BDL	1000
FLUORENE	PPM	BDL	1000
HEXACHLOROBENZENE	PPM	BDL	1000
HEXACHLOROBUTADIENE	PPM	BDL	1000
HEXACHLOROCYCLOPENTADIENE	PPM	BDL	1000
HEXACHLOROETHANE	PPM	BDL	1000
INDENO(1,2,3-CD)PYRENE	PPM	BDL	1000
ISOPHORONE	PPM	BDL	1000
NAPHTHALENE	PPM	BDL	1000
NITROBENZENE	PPM	BDL	1000
N-NITROSODIMETHYLAMINE	PPM	BDL	1000
N-NITROSODI-N-PROPYLAMINE	PPM	BDL	1000
N-NITROSODIPHENYLAMINE	PPM	BDL	1000
PHENANTHRENE	PPM	BDL	1000
PYRENE	PPM	BDL	1000
1,2,4-TRICHLOROBENZENE	PPM	BDL	1000

Sample ID.: BOILER FUEL

Test Parameters continued on next page



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICAL  
17002

Lab I.D.#: 88-1857-1  
Order Date: 05/31/88  
Sampled By: N/S

Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

Sample ID.: BOILER FUEL Sample Date: N/S Time: N/S

PP/BASE/WATER

PP BASE/NEUTRAL EXTRACTABLES

continued

Parameter	Units	Result	Detection Limit
1,2-DICHLOROBENZENE	PPM	BDL	1000
1,2-DIPHENYLHYDRAZINE	PPM	BDL	1000
1,3-DICHLOROBENZENE	PPM	BDL	1000
1,4-DICHLOROBENZENE	PPM	BDL	1000
2,4-DINITROTOLUENE	PPM	BDL	1000
2,6-DINITROTOLUENE	PPM	BDL	1000
2-CHLORONAPHTHALENE	PPM	BDL	1000
3,3-DICHLOROBENZIDINE	PPM	BDL	1000
3,4-BENZOFLUORANTHENE	PPM	BDL	1000
4-BROMOPHENYL PHENYL ETHER	PPM	BDL	1000
4-CHLOROPHENYL PHENYL ETHER	PPM	BDL	1000



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICAL  
17002

Lab I.D.#: 88-1857-1  
Order Date: 05/31/88  
Sampled By: N/S

Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

Sample ID.: BOILER FUEL Sample Date: N/S Time: N/S

PP/PEST/608

PP PESTICIDES METHOD 608

Parameter	Units	Result	Detection Limit
ALDRIN	PPB	BDL	100
ALPHA-BHC	PPB	BDL	100
BETA-BHC	PPB	BDL	100
DELTA-BHC	PPB	BDL	100
GAMMA-BHC (LINDANE)	PPB	BDL	100
CHLORDANE	PPB	BDL	100
4,4'-DDD	PPB	681	100
4,4'-DDE	PPB	717	100
4,4'-DDT	PPB	388	100
DIELDRIN	PPB	BDL	100
ENDOSULFAN I	PPB	BDL	100
ENDOSULFAN II	PPB	BDL	100
ENDOSULFAN SULFATE	PPB	BDL	100
ENDRIN	PPB	BDL	700
ENDRIN ALDEHYDE	PPB	BDL	300
HEPTACHLOR	PPB	BDL	100
HEPTACHLOR EPOXIDE	PPB	BDL	100
PCB-1016	PPB	BDL	2000
PCB-1221	PPB	BDL	2000
PCB-1232	PPB	BDL	2000
PCB-1242	PPB	BDL	2000
PCB-1248	PPB	BDL	2000
PCB-1254	PPB	BDL	2000
PCB-1260	PPB	BDL	2000
TOXAPHENE	PPB	BDL	10000



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICAL  
17002

Lab I.D.#: 88-1857-1  
Order Date: 05/31/88  
Sampled By: N/S

Sample Site: BOILER FUEL  
Sample Type: BOILER FUEL

Sample ID.: BOILER FUEL Sample Date: N/S Time: N/S

PP/VOLATILE

PRIORITY POLLUTANT VOLATILES

Parameter	Units	Result	Detection Limit
ACROLEIN	PPB	BDL	100000000
ACRYLONITRILE	PPB	BDL	100000000
BENZENE	PPB	BDL	10000
BIS(CHLOROMETHYL) ETHER	PPB	BDL	500000
BROMOFORM	PPB	BDL	500000
CARBON TETRACHLORIDE	PPB	BDL	300000
CHLOROBENZENE	PPB	BDL	100000
CHLORODIBROMOMETHANE	PPB	BDL	500000
CHLOROETHANE	PPB	BDL	500000
2-CHLOROETHYLVINYL ETHER	PPB	BDL	500000
CHLOROFORM	PPB	BDL	500000
DICHLOROBROMOMETHANE	PPB	BDL	500000
DICHLORODIFLUOROMETHANE	PPB	BDL	500000
1,1-DICHLOROETHANE	PPB	BDL	500000
1,2-DICHLOROETHANE	PPB	BDL	300000
1,1-DICHLOROETHYLENE	PPB	BDL	500000
TRANS-1,2-DICHLOROETHYLENE	PPB	BDL	500000
1,2-DICHLOROPROPANE	PPB	BDL	500000
1,3-DICHLOROPROPYLENE	PPB	BDL	500000
ETHYL BENZENE	PPB	390000	100000
METHYL BROMIDE	PPB	BDL	500000
METHYL CHLORIDE	PPB	BDL	500000
METHYLENE CHLORIDE	PPB	BDL	500000
1,1,2,2-TETRACHLOROETHANE	PPB	BDL	500000
TETRACHLOROETHENE	PPB	BDL	500000
TOLUENE	PPB	25700000	100000
1,1,1-TRICHLOROETHANE	PPB	BDL	500000
1,1,2-TRICHLOROETHANE	PPB	BDL	500000
TRICHLOROETHYLENE	PPB	BDL	100000
TRICHLOROFLUOROMETHANE	PPB	BDL	500000
VINYL CHLORIDE	PPB	BDL	100000



11 EAST OLIVE ROAD PENSACOLA, FLORIDA 32514  
PHONE (904) 474-1001

Client: REICHOLD CHEMICALS  
17002 P.O. BOX 1433  
PENSACOLA, FLORIDA 32596

Lab I.D.#: 88-1857A  
Order Number: P13744  
Order Date: 07/05/88  
Sampled By: N/S  
Sample Date: 07/05/88  
Sample Time: N/S

Project Number: 88-1857A  
Project Name: REICHOLD CHEMICALS  
Sample Site: N/S  
Sample Type: WATER

N/S = NOT SUBMITTED

---

Lab ID	Sample ID	Parameter	Units	Results
88-1857A-1	#1	HEAT VALUE	BTU/gal	105990
88-1857A-1	#1	CHLORINE	%	0.030
88-1857A-1	#1	SULFUR	%	0.32
88-1857A-1	#1	ASH	%	0.02


Comments: Methods For Chemical Analysis of Water & Wastes, EPA 600/4-79-020,  
Revised March 1983.  
% = weight per volume

Approved By: W. F. Bowers  
page 1 end of report

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. 2.  Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

<p>3. Article Addressed to:</p> <p>Mr. Daniel B. Smith, P.E.  Manager, Industrial Dept.  Baskerville-Donovan Engineers, Inc.  316 S. Baylan Street, Suite 300  Pensacola, FL 32501</p>	<p>4. Article Number  P 274 007 446</p> <p>Type of Service:  <input type="checkbox"/> Registered <input type="checkbox"/> Insured  <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD  <input type="checkbox"/> Express Mail</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature — Addressee  X</p> <p>6. Signature — Agent  X</p> <p>7. Date of Delivery</p>	<p>8. Addressee's Address and fee paid requested</p> <div style="text-align: center;">  </div>

PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

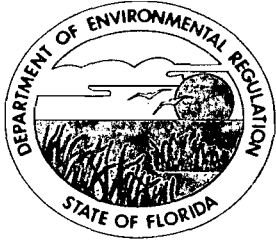
DOMESTIC RETURN RECEIPT

P 274 007 446  
**RECEIPT FOR CERTIFIED MAIL**  
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

\* U.S.G.P.O. 1985-480-794

Sent to Mr. Daniel B. Smith, P.E.	
Street and No. Baskerville-Donovan 316 S. Baylan St., Ste. 300	
P.O., State and ZIP Code Pensacola, FL 32501	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 9-7-88 Permit: AC 17-153303	

PS Form 3800, June 1985



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 7, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Daniel B. Smith, P.E.  
Manager, Industrial Department  
Baskerville-Donovan Engineers, Inc.  
316 S. Baylen Street, Suite 300  
Pensacola, Florida 32501

Dear Mr. Smith:

Re: Proposed Modification - No. 11 Boiler - AC 17-153303

The following additional information is required for preliminary review of Reichhold Chemical's air permit application received on August 10, 1988.

1. Information showing why BACT does not apply.
2. An explanation of why the VE limit of 30 percent for carbonaceous fuel burning equipment should apply instead of the 20 percent limit for boilers.
3. A complete chemical analysis of Dimer oil is needed to verify non-toxic composition (confidentiality will be provided on request). If toxics are present in trace amounts, please identify and quantify if possible.

This additional information is required in order to make a rule applicability assessment. If you have any questions on the above, please contact me at the above address or call John Reynolds at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/JR/s

cc: J. Preece





**BASKERVILLE-DONOVAN ENGINEERS, INC.**  
**A PROFESSIONAL SERVICE ORGANIZATION**

• PENSACOLA • TALLAHASSEE •  
MILTON • DESTIN • PANAMA CITY • APALACHICOLA • DAYTONA BEACH

August 4, 1988

Mr. Clair Fancy  
Department of Environment Regulation  
2600 Blair Stone Road  
Room 306-7  
Tallahassee, Florida 32399

RECEIVED

AUG 10 1988

DER-BAQM

Re: Application for Construction  
Reichhold Chemicals, Inc.  
Our Project Number 077301

Dear Mr. Fancy:

Please find enclosed 3 copies of DER Form 17-1.202(2) and a check for \$100.00 to process the application for the construction of modification to Boiler #11 at Reichhold Chemicals' Pensacola Facility. These modifications will enable the boiler, which now fires only on natural gas, to fire in a fuel-oil mode of operation. The fuel oil to be fired is a product of Reichhold's production process. The product is called "Dimer" oil, and has qualities very similar to #5 fuel oil. The oil is low in sulfur and ash (0.32% and 0.02% respectively), and burns with a chemistry similar to fuel oil.

A sample of this oil was sent to the boiler manufacturer, Superior Boiler Co., for testing. The tests confirmed that the standard fuel oil controls provided by Superior will provide correct fuel-air ratio control when firing Dimer oil. Therefore, known and proven combustion technology will be used to assure that stack emissions will comply with established limits. Having reviewed both the chemistry of the Dimer oil and the combustion control hardware, we are assured this modification will result in stack discharges which are acceptable as represented in the application.

Please review this application and if you should have any questions, please feel free to call on me.

Very truly yours,

BASKERVILLE-DONOVAN ENGINEERS, INC.

Daniel B. Smith, P.E.  
Manager, Industrial Department

DBS/alk  
copied: *Jack Preece NW Dist*  
Enclosure *John Reynolds*

RECEIVED  
DER - MAIL ROOM  
1988 AUG 10 AM 10:44

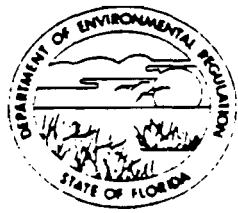
c - WFB

001031

AC 17-153303

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT  
160 GOVERNMENTAL CENTER  
PENSACOLA, FLORIDA 32501



RECEIVED

AUG 10 1988

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ROBERT V. KRIEGL  
DISTRICT MANAGER

DER-BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Steam Boiler [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Eccambia

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Boiler #11 Fuel Fired

SOURCE LOCATION: Street 407 South Pace Blvd. City Pensacola

UTM: East 476.4 North 3363.9

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 45 "W

APPLICANT NAME AND TITLE: C. K. Miller - Plant Manager

APPLICANT ADDRESS: \_\_\_\_\_

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Reichhold Chemicals

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: *C. K. Miller*  
C. K. Miller - Plant Manager  
Name and Title (Please Type)

Date: 8/4/88 Telephone No. 904/433-7621

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

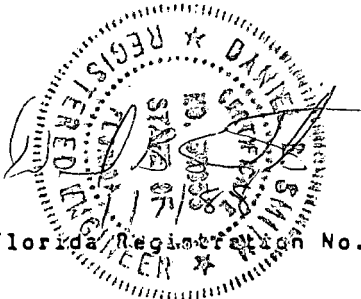
Signed D. B. Smith

Daniel B. Smith, P.E.  
Name (Please Type)

Baskerville-Donovan Engineers, Inc.  
Company Name (Please Type)

316 South Baylen Street Suite 300  
Mailing Address (Please Type)

Florida Registration No. 35633 Date: 7/19/88 Telephone No. 904/438-9661



**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary. The project consists of the installation of a liquid fuel storage tank, boiler controls and auxillary equipment for the burning of the plant products dimer oil, paracymene and limonene residue in the #11 steam boiler entails (a) the installation of a 10M gal. storage tank with a secondary containment; (b) installation of pumps, flow meters, control to transfer, feed and circulate oil; (c) installation of fuel gas analyzer (CO & O<sub>2</sub>) for adjusting boiler control & monitoring the oil combustion.

B. Schedule of project covered in this application (Construction Permit Application Only)  
Start of Construction Nov. 1, 1988 Completion of Construction July, 1990

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)  
Not Applicable

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.  
AO 17-119127 Boiler 11 issued 4/1/87 expiration 4/1/92.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52 ;  
if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_  
The use of plant fuel boiler fuel for steam production would average  
approximately 140 days per year.

F. If this is a new source or major modification, answer the following questions.  
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No  
a. If yes, has "offset" been applied? \_\_\_\_\_  
b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_  
c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? No

a. If yes, for what pollutants? \_\_\_\_\_

b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
N/A				

B. Process Rate, if applicable: (See Section V, Item i)

1. Total Process Input Rate (lbs/hr): N/A

2. Product Weight (lbs/hr): N/A

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

VENT 137-1

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
NO <sub>x</sub>	13.6	52.60	-	Visible	119218	59.61	
Aldehyde	0.17	0.66	-	Emissions	1490	0.75	
Hydrocarbon	0.51	1.97	-	30%	4471	2.24	
CO	0.68	2.63	-	Per 17.2.600	5961	2.98	
Particulate	3.91	15.12	0.15#/M BTU*	(10) (b) 2a	34275	17.14	

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

\* Per 17-2.600 (10) (b) 2b

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
None				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Plant Fuel Products Liquids	150 gal/hr	170 gal/hr	33.5

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 0.32% Percent Ash: 0.02%

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb 105,990 BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.

N/A

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 2 ft. Stack Diameter: 2.1 ft.  
 Gas Flow Rate: 7546 ACFM 4660 DSCFM Gas Exit Temperature: 285 °F.  
 Water Vapor Content: 10 % Velocity: 36.3 FPS

SECTION IV: INCINERATOR INFORMATION

NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

N/A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

N/A

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.



9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

NOT APPLICABLE SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (if yes, attach copy)

Yes  No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:\*

4. Capital Costs:

\*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:<sup>1</sup>

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:<sup>2</sup>

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

NOT APPLICABLE SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/di:

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

\*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent?  Yes  No
- b. Was instrumentation calibrated in accordance with Department procedures?  
 Yes  No  Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
- 2. Surface data obtained from (location) \_\_\_\_\_
- 3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
- 4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

- 1. \_\_\_\_\_ Modified? If yes, attach description.
- 2. \_\_\_\_\_ Modified? If yes, attach description.
- 3. \_\_\_\_\_ Modified? If yes, attach description.
- 4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO <sup>2</sup>	_____	grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

**APPLICATION TO CONSTRUCT**  
**SECTION II: GENERAL PROJECT INFORMATION**  
**ITEM A: "NATURE AND EXTENT OF PROJECT"**

**PROJECT DESCRIPTION**

This project consists of the installation of the equipment required to burn a blend of distillate and residue fuel oil in the existing gas-fired steam boiler #11, an 800 HP fire tube boiler. The fuel products produced are:

1. Dimer oil a mixture of two to four polymerized dipentene molecules.
2. Limonene residue the high boiler compounds, C10 alcohols and ketones, in the crude limonene a terpene chemical recovered from the oil present in the skin of oranges.
3. Para-cymene - a benzene compound.

The fuel products will be pumped and stored in a 10,000 gallon boiler fuel feed tank when the fuel will be heated and pumped to the boiler. The 10,000 gallon fuel storage - boiler feed tank, pump, heater, agitator, and flowmeters will be located in a diked area with secondary containment equipped with a sump pump.

**APPLICATION TO CONSTRUCT**  
**SECTION V: SUPPLEMENTAL REQUIREMENTS**

**Items 2 & 3 - Basis of Emission - Estimate & Potential Emission Determination**

The standard emission factors were obtained from EPA AP 42 Table 1.3-1

Nitrogen Oxide	80 lbs/1,000 gals.
Aldehyde	1 lb/1,000 gals.
Hydrocarbon	3 lbs/1,000 gals.
CO	4 lbs/1,000 gals.
Particulate	23 lbs/1,000 gals.

**Boiler 11 Maximum Emissions/Potential Emission**

NO<sub>x</sub>: 170 gals plant fuel/hr x 80 lbs/1,000 gals. = 13.6 lbs/hr  
 13.6 lbs/hr. x 24 hrs/day x 365.25 days/yr. = 119,218 lbs/yr.  
 119,218 lbs/yr. x  $\frac{1 \text{ ton}}{2,000 \text{ lbs}}$  = 59.61 tons/yr.

Aldehyde: 170 gals plant fuel/hr x 1 lb/1,00 gal = 0.17 lbs/hr.  
 = 1,490 lbs/yr.  
 = 0.75 tons/yr.

Hydrocarbon: 170 gals plant fuel/hr x 3 lb/1,000 gal = 0.51 lbs/hr  
 = 4471 lbs/yr  
 = 2.24 tons/yr.

CO: 170 gals plant fuel/hr. x 4 lbs/1,000 gal. = 0.68 lbs/hr.  
 = 5961 lbs/yr.  
 = 2.98 tons/yr.

Particulate: 170 gals plant fuel/hr x 23 lbs/1,000 gal = 3.91 lbs/hr.  
 = 34,275 lbs/yr.  
 = 17.14 tons/yr.

**Boiler 11 Actual Emissions**

NO<sub>x</sub>: 150 gals/hr. x 80 lbs/1000 gal x 4.383  $\frac{\text{tons/yr}}{\text{lbs/hr}}$  = 52.60 tons/yr.

Conversion factor lbs/hr x 24 hrs/day x 365.25 days/yr. x  $\frac{1 \text{ M}}{2000/\text{hr}}$  = 4.383  $\frac{\text{tons/yr.}}{\text{lbs/hr}}$

Aldehyde: 150 gals/hr x 1 lb/1000 gals x 4.383  $\frac{\text{hrs/yr}}{\text{lbs/hr}}$  = 0.66 tons/yr.

Hydrocarbon: 150 gals/hr x 3 lbs/1000 gals x 4.383  $\frac{\text{hrs/yr}}{\text{lbs/hr}}$  = 1.97 tons/yr

CO: 150 gals/hr x 4 lbs/1000 gals x 4.383  $\frac{\text{hrs/yr}}{\text{lbs/hr}}$  = 2.63 tons/yr

Particulate: 150 gals/hr x 23 lbs/1000 gals x 4.383  $\frac{\text{hrs/yr}}{\text{lbs/hr}}$  = 15.12 tons/yr.

#### **Item 4 & 5 Design Details of Air Control Equipment**

A continuous O<sub>2</sub>, oxygen, and CO carbon monoxide monitoring system of the flue gas will be installed on boiler #11. The CO and O<sub>2</sub> analysis will be used to adjust the boiler controls for operating at the best efficiency. The CO and O<sub>2</sub> data will be tied into an existing process control system. It will alarm for high levels of CO and O<sub>2</sub> and be programmed to shut the plant fuel boiler feed system off if no corrective action is taken for high CO and O<sub>2</sub> levels.

#### **Item 6 "8 1/2 x 11 Process Flow Diagram"**

See attached Process Flow Boiler Feed System SKA-2102.

#### **Item 7 "8 1/2 x 11 Plant Location Plot Plan"**

See attached sections from USGS Pensacola Quadrangle.

#### **Item 8 "8 1/2 x 11 Process Location Plant Plan"**

See attached Plot Plan Building #137 Boiler House SKA-2056.



AIR EMISSION INVENTORY

<u>PERMIT NO.</u>	<u>PROCESS</u>	<u>POLLUTANT</u>	<u>TPY ACTUAL</u>	<u>TPY POTENTIAL</u>
A017-132226	Industrial Steam Boiler No. 11	Particulates	.33	.44
		NOx	15.35	20.5
		SO2	.066	.44
A017-93688	Dowtherm Heater No. 1 3 Million BTU/Hr. Max Input Natural Gas Only	Particulates	.044	.043
		NOx	.375	.406
		HC	.100	.108
		SO2	.001	.0011
A017-93689	Dowtherm Heater No. 2 3 Million BTU/Hr. Max Input Natural Gas Only	Particulates	.037	.040
		NOx	.312	.338
		HC	.083	.09
		SO2	.001	.0011
A017-93690	Reactor No. 7 Furnace 6 Million BTU/Hr. Natural Gas Only	Particulates	.055	.220
		NOx	.363	.45
		HC	.122	.408
		SO2	.002	.008
A017-81422	Resin Flaking & Bagging Building No. 65	Particulates Resin Dust	0.42	14.2
A017-150912	Resin Flaking & Bagging Building No. 56	Particulates Resin Dust	0.88	13.7
A017-60662	Flaker Bag House - South Plant Flaking and Crushing	Particulates Resin Dust	.36	36

A017-81420	Polyterpene Resin Process		Hydrocarbons			86.9	96.6	
	<u>Hydrocarbon</u> <u>Generic Name</u>	Dimer Mixed Aromatic/ Aliphatic HC	Toluene Aromatic HC	VM&P Naphtha Aliphatic HC	Limonene Monocyclic Terpene HC	Alpha & Beta Pinene Bicyclic Terpene HC		
	<u>Vapor Pressure</u>	0.003mm @ 100°F	22mm Hg @ 68°F	15mm Hg @ 100°F	3.5mm Hg @ 100°F	9mm Hg @ 100°F		
A017-150915	Zinc Resinate Process		Hydrocarbons			19.8	52.65	
	<u>Hydrocarbon</u> - Mineral Spirits <u>Generic Name</u> - Aliphatic HC <u>Vapor Pressure</u> - 1.4mm Hg @ 70°F		Rosin Oil Disproportionated Wood Rosin .003mm Hg @ 100°F					
A017-73935	Organic Coatings Process		Hydrocarbons			8.75	50.5	
	<u>Hydrocarbon</u> - VM&P <u>Generic Name</u> - Aliphatic HC		Mineral Spirits Aliphatic HC	Vinyl Toluene Aromatic HC				
	<u>Vapor Pressure</u> - 15mm Hg @ 100°F		1.4 mm Hg @ 20°F	1.1mm Hg @ 68°F				
A017-81421	*Paramenthane Hydroperoxide Process		Hydrocarbons			*0	39.8	
	<u>Hydrocarbon</u> - Paramenthane <u>Generic Name</u> - Terpene HC <u>Vapor Pressure</u> - 7 mm Hg @ 100°F							
A017-93677	South Plant Main Process Scrubber		Odors			Not quantified in permit		
A017-93686	R-1 Reactor Scrubber		Odors			Not quantified in permit		

A017-93687	R-2 Reactor Scrubber	Odors	Not quantified in permit	
A017-93683	*Flaker System Hood	Heat and Traces of Hydrocarbons (Resin Oils)		
A017-149267	Limonene Distillation	VOC	17.2	290.57
A017-135543	Terpene Phenol Resin Flaking and Bagging	Particulates Resin Dust	3.6	90
A017-135541	Terpene Phenol Resin Facility		15.4	63.2

Construction Permits

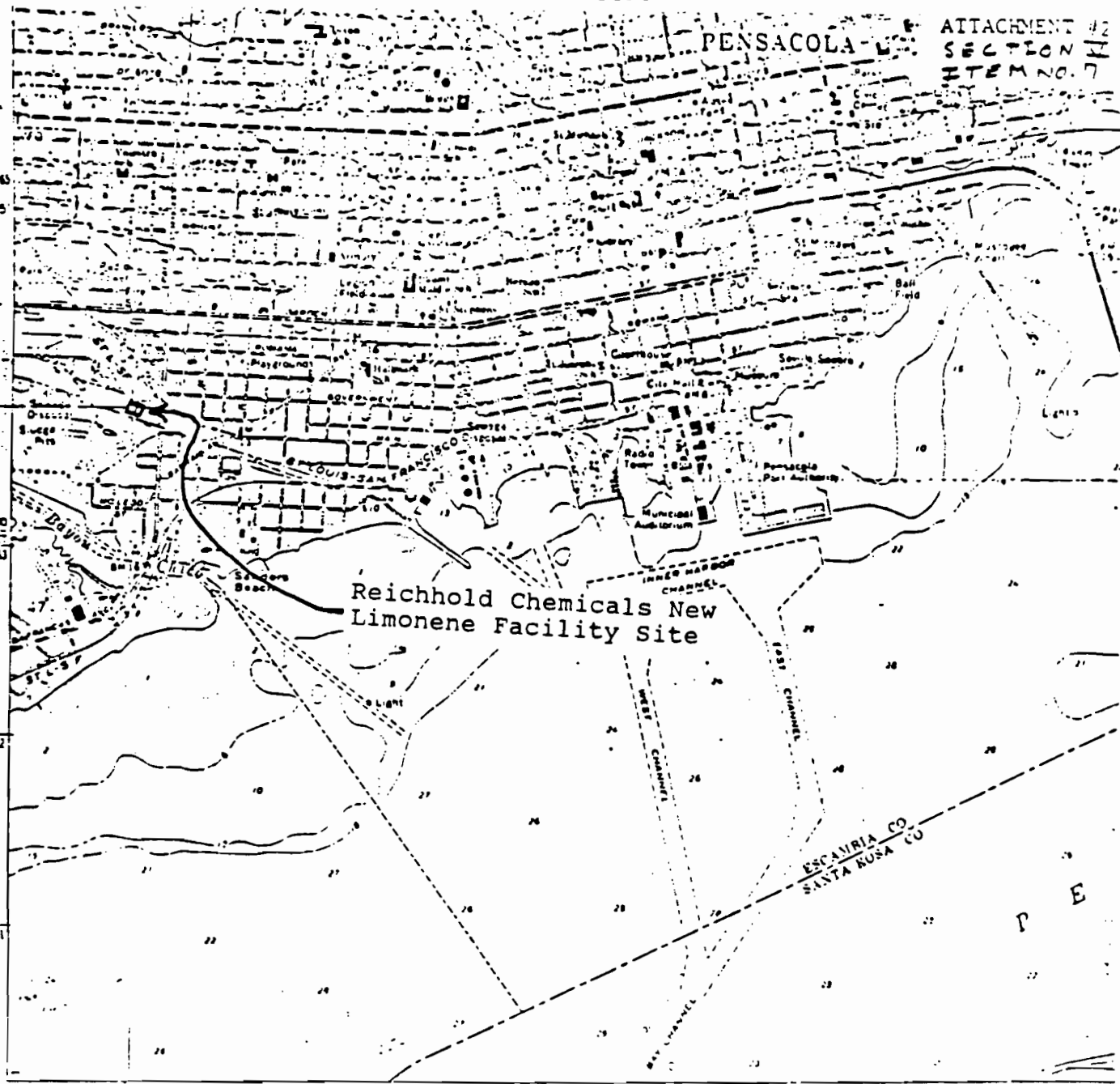
AC17-115381	Pilot Plant	Hydrocarbon Vapors	Negligible	
AC17-115382	Pilot Plant Raw Material and Loading Station	Hydrocarbon Vapors	1.07	21.4
AC17-149104	Gas Fired Boiler No. 12	Particulates	0.28	0.45
		NOx	13.21	20.79
		SO2	0.06	0.09

\*These units for standby only.

**CURRENT TOTAL EMISSION FOR PENSACOLA FACILITY**

	<u>TPY Actual</u>	<u>TPY Potential</u>
Particulates	5.73	154.64
Hydrocarbons	148.36	593.93
NO <sub>x</sub>	16.4	21.69
SO <sub>2</sub>	0.07	0.45

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Environ (misc page 4)



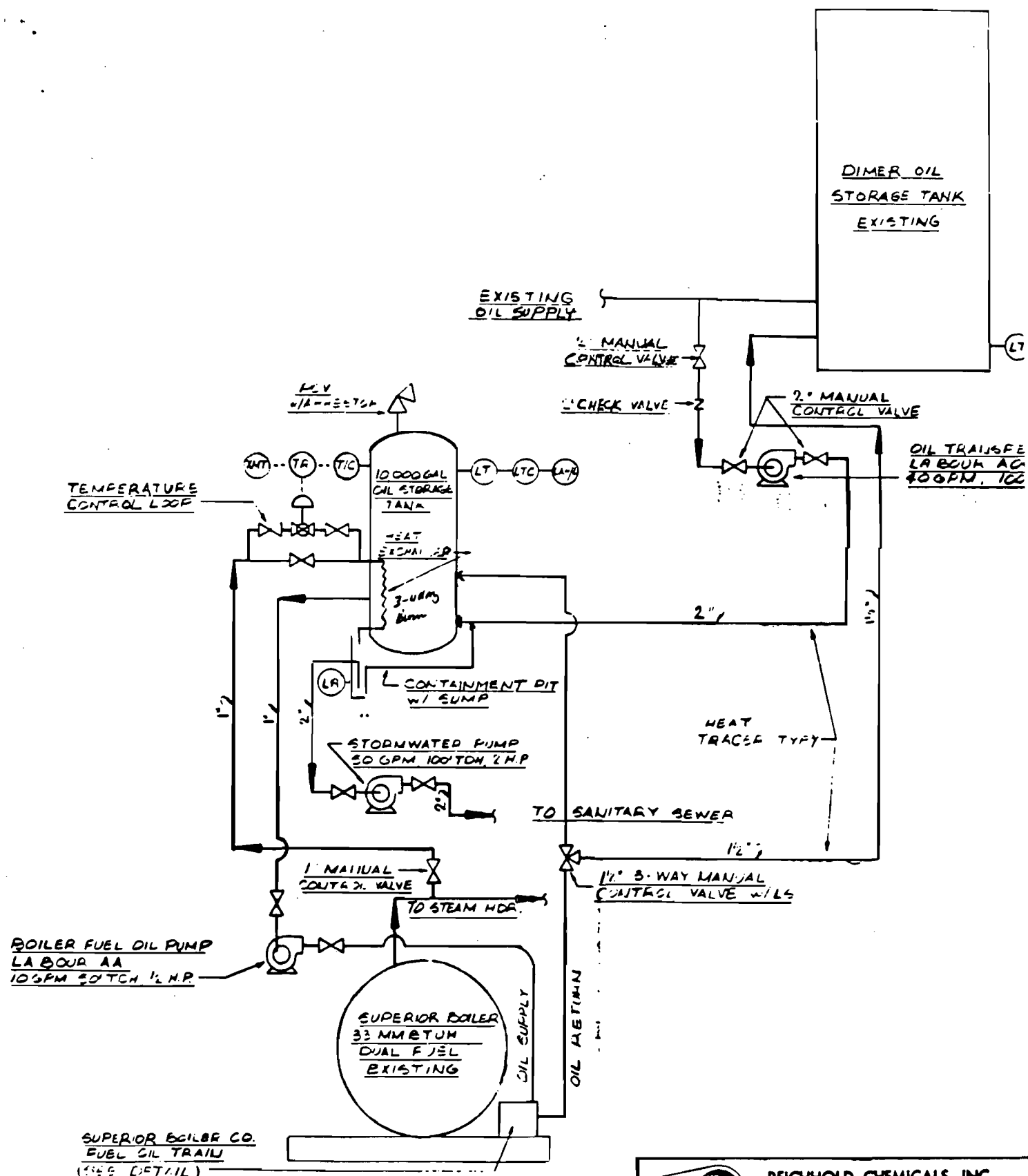
Reichhold Chemicals New  
Limonene Facility Site

ESCALVRIA CO.  
SANTA ROSA CO.

Maps edited and published by the Geological Survey  
 Control by USGS and USC&S  
 Topography by photogrammetric methods from aerial photographs  
 taken January 1965, March 1965 and January 1966  
 Field checked 1970  
 Selected hydrographic data compiled from USC&S Charts  
 490 and 1265 (1969)  
 This information is not intended for navigational purposes.  
 Polyconic projection - 1927 North American system  
 10,000 foot grid based on Florida coordinate system with zone  
 1600 meters by zone Transverse Mercator projection  
 Zone 16, datum 1983  
 Red line indicates area in which only 1:250,000 scale maps are available

THIS MAP COMPLETES A  
 FOR SALE BY U.S. GPO.  
 A FOLDER DESCRIBING TOPOGRAPHY

SECTION V  
ITEM 7  
USGS PENSACOLA QUADRANGLE



TEMPERATURE CONTROL LOOP

EXISTING OIL SUPPLY

2" MANUAL CONTROL VALVE

CHECK VALVE

2" MANUAL CONTROL VALVE

OIL TRANSFER LA BOUR AA 100 GPM, 100

10,000 GAL OIL STORAGE TANK

HEAT EXCHANGER

3-WAY MAN. VALVE

CONTAINMENT PIT W/ SUMP

STORMWATER PUMP 50 GPM, 100' TDH, 2 HP

TO SANITARY SEWER

HEAT TRACE TYPE


1" MANUAL CONTROL VALVE

1.5" 3-WAY MANUAL CONTROL VALVE W/LS

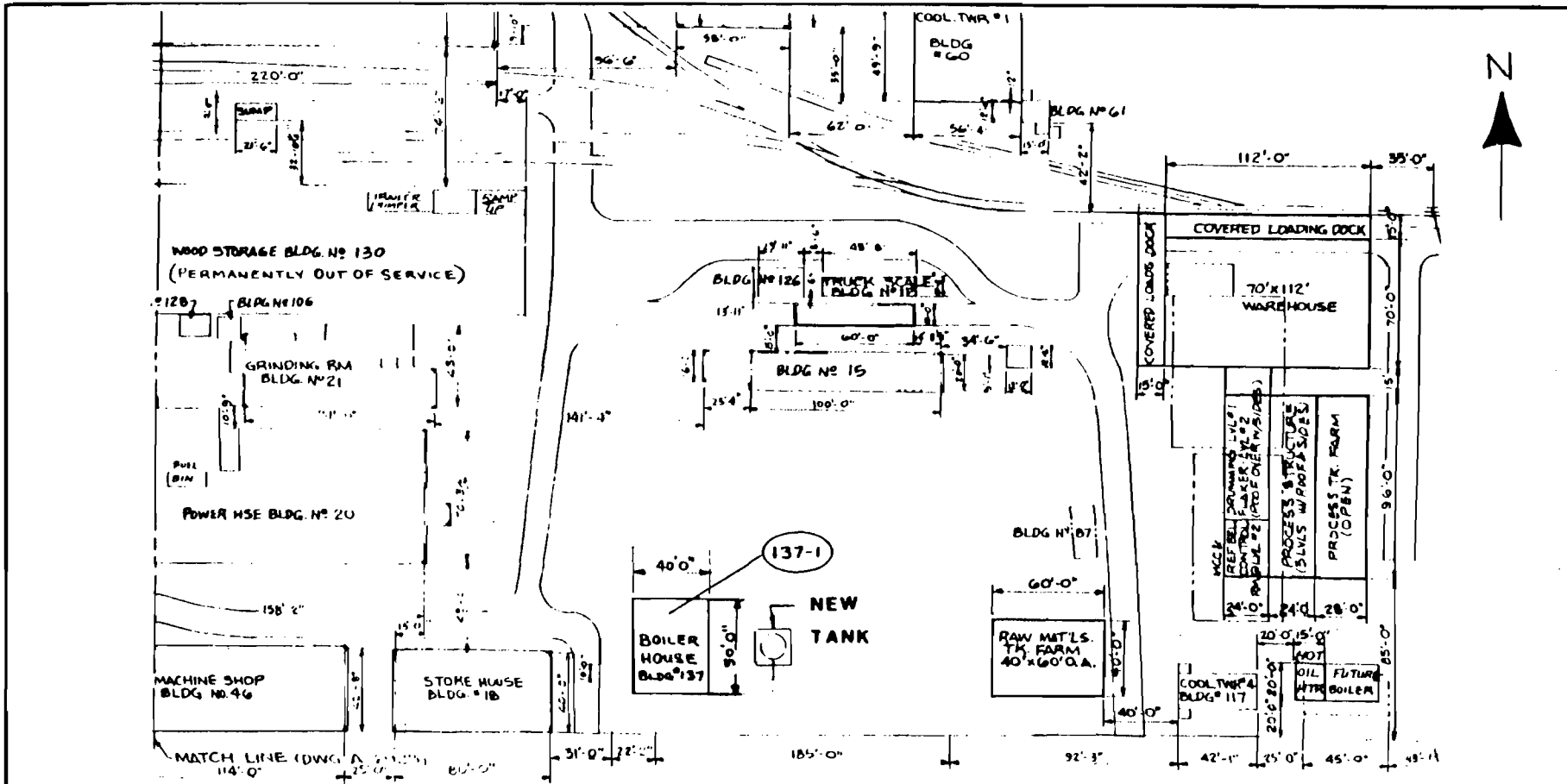
BOILER FUEL OIL PUMP LA BOUR AA 100 GPM 50' TDH 1.5 HP

SUPERIOR BOILER 33 MM BTU DUAL FUEL EXISTING

SUPERIOR BOILER CO. FUEL OIL TRAIN (SEE DETAIL)

 <b>REICHOLD CHEMICALS, INC.</b> Pensacola, Florida		
<b>PROCESS FLOW BOILER FEED SYSTEM</b>		
DR. SST	ENG. AHK	APPD
DATE 6-88	SCALE	SKA-2102

AP 11208



APPLICATION TO CONSTRUCT  
SECTION V: ITEM 8

**NOTICE**

These papers contain confidential matters which are the exclusive property of Reichhold Chemicals, Inc. No extracts therefrom or any use or disclosure thereof may be made except upon proper authorization and for the sole benefit of the Corporation.

		REICHOLD CHEMICALS, INC.	
PLOT PLAN - BLDG No 137 BOILER HOUSE			
DR.	ENGR.	APP.	DATE
<i>[Signature]</i>	<i>[Signature]</i>		4/21/58
NO.	DATE	REVISIONS	SCALE
			SKA-2056

3							
2							
1							
NO.	DATE	REVISIONS	DR.	ENGR.	APP.	DATE	SCALE



**REICHHOLD**

NEWPORT DIVISION

BEST AVAILABLE COPY 0018

00013141

PENSACOLA, FL. 32596

311

1110-09

CHECK DATE

08 04 88

MO. DAY YR.

DOLLARS	CENTS
*****100	00

PAY

\*\*\*\*\*100 DOLLARS AND 00 CENTS\*\*\*\*\*

REICHHOLD CHEMICALS, INC.

TO THE ORDER OF

State of Florida  
 Bureau of Air Quality Management  
 2600 Blairstone Road  
 Tallahassee, FL 32301  
 MANUFACTURERS HANOVER, BANK (DELAWARE)



THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

Dear Mr. Fandy:

**REICHHOLD CHEMICALS, INC.**

VENDOR NO.	INVOICE DATE	POST MED.	PLT.	INVOICE AMOUNT	DISCOUNT	NET AMOUNT
				100.00		\$100.00
Construction permit application fee						

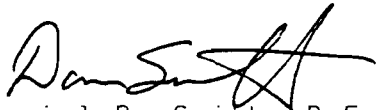
DETACH BEFORE DEPOSITING

acceptable as represented in the application.

Please review this application and if you should have any questions, please feel free to call on me.

Very truly yours,

BASKERVILLE-DONOVAN ENGINEERS, INC.



Daniel B. Smith, P.E.  
 Manager, Industrial Department

DBS/alk

Enclosure

c - WFB

RECEIVED  
 DER - MAIL ROOM  
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