

BEST AVAILABLE COPY

Check Sheet

Company Name:
Permit Number:
PSD Number:
Permit Engineer:

Reschold Chemicals
AC 17-098127

Cross References:
 AC 17-104265
 AC 17-73934

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

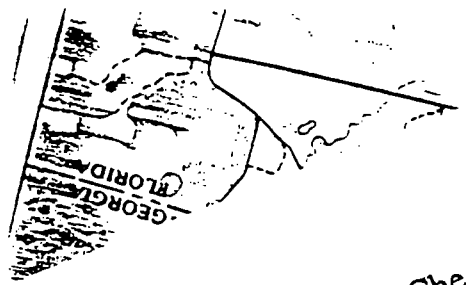
Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

June 29, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ellis G. Fleming
Director of Manufacturing
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

Dear Mr. Fleming:

Re: AO 17-73934 - Resin Flaking and Bag Packaging
AC 17-104265 - Resin Flaking and Bag Packaging Facility
AC 17-098127 - Therpene-Phenol Resin Facility

The Bureau of Air Quality Management is in receipt of Mr. Robert W. Clarke's letters dated June 12, 1987 and June 23, 1987 on behalf of Reichhold Chemicals. These letters request to keep operating permit AO 17-73934 for a period of eight (8) more months and to extend the expiration date of construction permits AC 17-104265 and AC 17-098127, respectively.

These requests are acceptable. Specific Condition No. 1 of construction permit AC 17-104265 will be changed as follows:

From: This permit replaces current operating permit No. AO 17-73934. The applicant shall return this operating permit to the Department's district office after the new facility is in operation.

To: This permit replaces current operating permit No. AO 17-73934. The applicant shall return this operating permit to the Department's district office on or before February 28, 1988.

The expiration date for construction permits AC 17-098127 and AC 17-104265 will be changed as follows:

From: June 30, 1987
To: August 29, 1987

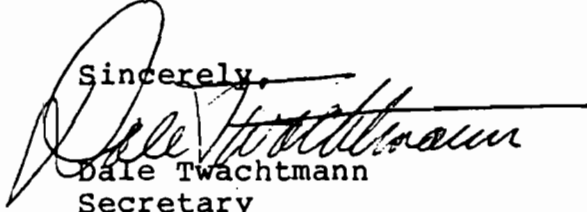
Mr. Ellis G. Fleming
Page Two
June 29, 1987

A copy of this letter must be attached to the referenced construction permits and shall become a part of each permit.

Attachments to be Incorporated:

Mr. Robert W. Clarke's letters of June 12, 1987, and June 23, 1987.

Sincerely,



Dale Twachtmann
Secretary

DT/ks

cc: Jack Preece, DER Pensacola
Robert W. Clarke, P.E., Reichhold-Pensacola

attachments

ATTACHMENTS

Reichhold Chemicals, Inc.

Law Office
407 South Park Boulevard
Tallahassee, Florida 32309

DER

JUN 15 1987

BAQM

REICHHOLD

June 12, 1987

Mr. Clair Fancy
Bureau of Air Quality Management
2600 Blainstone Road
Tallahassee, FL 32401

Dear Mr. Fancy:

The Reichhold Chemical Pensacola Plant has recently completed construction and startup of a new terpene phenol resin flaking and bagging operation (Permit No. AC-17-104265) to replace an old unit which has been shut down. An Operating Permit Application has been submitted and currently being reviewed by the Northwest District Office.

When this project was in the planning stage, Reichhold's strategy was to:

1. Shut down the existing terpene phenol resin crushing and bag packaging (Permit A017-73937)
2. Transfer zinc resinate flaking and bag packaging operations (Permit A017-73934) consolidate production with an identical product made in our Bay Minette, AL Plant.

Therefore, our permit application and the subsequent construction permit issued by your office, stated that these two permits would be turned in with the operating permit requests.

Unfortunately, on April 15, 1987, a severe fire destroyed the zinc resinate production facilities at the Bay Minette Plant.

We, therefore, request permission to keep Permit A-017-73934 for a period of six (6) to eight (8) months to allow production to resume in Bay Minette or alternate production elsewhere. This would result in temporary permitted emission of 0.121 pounds/hour from the Building No. 56 resin flaking operation.

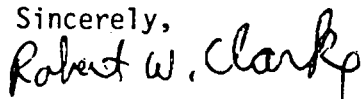
Tel.: (904) 433-7621
(800) 874-0868
Telex: 702424

Mr. Clair Fancy
Page 2
June 12, 1987

Any assistance and relief you can provide us is greatly appreciated.

If you have any questions or need additional information, please contact me at:
(904) 433-7631 - Ext. 543.

Sincerely,



Robert W. Clark
Senior Environmental Engineer

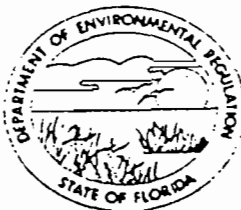
RWC/gw

pc: J. Preece - DER - Pensacola

PERMIT Application AC 17-104265
STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501



BOB GRAH
GOVERNOR
VICTORIA J. TSCHINK
SECRETARY
ROBERT V. KRIEG
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Resin Flaking & Bagging New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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) Building No. 133

Resin Flaking & Bagging Vents 133-9 & 133-10.

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East _____ North _____

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

APPLICANT NAME AND TITLE: Ellis G. Fleming - Director of Manufacturing

APPLICANT ADDRESS: P. O. Box 1433, Pensacola, FL 32596

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT :

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

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 permit establishment.

*Attach letter of authorization

Signed: *Ellis G. Fleming*
Ellis G. Fleming - Director of Manufacturing
Name and Title (Please Type)

Date: 5/13/85 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 permit application. There is reasonable assurance, in my professional judgment,

¹ 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 *David L. Tyner*

David L. Tyner, Senior Project Engineer

Name (Please Type)

Reichhold Chemicals, Inc.

Company Name (Please Type)

P. O. Box 1433, Pensacola, FL 32596

Mailing Address (Please Type)

Florida Registration No. 32706 Date: 5/13/85 Telephone No. (904)478-2060

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.

Consolidation and expansion of existing resin flaking and bag packaging operations.

The project will result in full compliance. Also see attached "Project Description" and "Process Description" at the back of this application.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction August 13, 1985 Completion of Construction December 31, 1985

- 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.)

Particulate collection and air conveying equipment	\$ 7,500
Particulate removal equipment	\$ 10,500
TOTAL	\$ 18,000

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

This new permit will replace:

*A017-73937: Issued 10/13/85; Expiration 9/1/88

*A017-73934: Issued 10/13/83; Expiration 9/1/88

APPLICATION TO CONSTRUCT

SECTION II: GENERAL PROJECT INFORMATION

ITEM A: "NATURE AND EXTENT OF PROJECT"

Project Description

This project consists of the consolidation (and shut down) of two existing resin packaging operations and the construction of a new consolidated higher capacity packaging operation.

°Operations To Be Shut Down:

1. Permit No. A-017-73937 "Resin Crushing and Bag Packaging" Building No. 91; Vent No. 91.
- 2. Permit No. A017-73934 "Resin Flaking and Bag Packaging" Building No. 56; Vents No. 56-1 & 56-2.

°New Consolidated Operation:

1. Construction Permit Application "Resin Flaking and Bag Packaging"; Building No. 133; Vents No. 133-9 & 133-10

New state of the art particulate air conveying and particulate removal equipment is being installed to ensure compliance with Rule 17-2.610.

For additional process details, refer to the information attached under Section V: Item G.

APPLICATION TO CONSTRUCT
SECTION II: GENERAL PROJECT INFORMATION
ITEM F.3. "PSD REQUIREMENTS"
NET EMISSION INCREASE DETERMINATION
RESIN FLAKING AND BAG PACKAGING CONSOLIDATION
REICHOLD CHEMICALS, INC.

Pensacola, Florida Plant

<u>Permit #</u>	<u>Area/Service</u>	<u>Process Weight Rate</u>	<u>Controlled Emissions Actual</u>	<u>*Allowance</u>
<u>Existing Operations To Be Shut Down</u>				
A017-73937	Bldg #91 Resin Crushing & Bag Packaging	10,000 #/D 1,250 #/Hr = 0.625 T/Hr	0.125 #/hr	2.7 #/hr
A017-73934	Bldg #56 Resin Flaking	36,000 #/D 1,500 #/Hr = 0.75 T/Hr	0.121 #/hr	3.13 #/hr
TOTAL		46,000 #/D = 2,750 #/hr = 1.375 T/Hr	0.335 #/hr = 1.5 T/Yr	5.83 #/hr = 25.5 T/Yr

0.5 Tons/Yr

Proposed New Consolidated Operation

Bldg #133 Resin Flaking & Bag Packaging	66,000 #/D = 8,250 #/Hr = 4.125 T/Hr	0.825 #/Hr 3.6 T/Yr	8.64 #/hr 37.75 T/Yr
---	--	------------------------	-------------------------

Net Emission Increase -for this Project 2.1 T/Yr (Actual) 12.25 T/Yr (Allowable)

Therefore, since the net emission increase is less than the "Significant Emission Rate: for Particulate (25 tons per year), this project does not require new source review or PSD determination.

(*E = 3.59 P^{0.62}); E = 3.59 (4.125 T/Hr)^{0.62} = 8.64 #/Hr = 37.75 T/Yr)

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

TO: Dale Twachtmann

THRU: Howard Rhodes *HR*

FROM: Clair Fancy *CF*

DATE: June 29, 1987

SUBJ: Amendments to Construction Permits Nos. AC 17-104265 and
-098127
Reichhold Chemicals, Inc.

Office of the Secretary	
FOR ROUTING TO OTHER THAN THE ADDRESSEE	
TO: _____	LOCN: _____
TO: _____	LOCN: _____
TO: _____	LOCN: _____
FROM: _____	DATE: _____

Attached for your approval and signature is a letter extending the expiration date for the above referenced construction permits. Also, the letter allows the retaining of an operating permit No. AO 17-73934 until February 28, 1988, by amending construction permit No. AC 17-104265, which currently contains a restriction for the referenced operating permit in a Specific Condition.

The Bureau recommends approval of these amendments.

CHF/BM/s

attachments

File Copy

Reichhold Chemicals, Inc.

Newport Division
407 South Pace Boulevard
P.O. Box 1433
Pensacola, Florida 32596

DER
JUN 24 1987
BAQM

REICHHOLD

June 23, 1987

FEDERAL EXPRESS

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
7600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Fancy:

Construction Permit Numbers AC17-098127 & AC17-104265

Construction is complete, performance tests have been conducted and a Permit to Operate Application submitted to the Northwest District DER. Due to the complexity of the process and the resulting test compliance report, the Northwest District DER has requested additional informational and data and their review will now extend beyond the construction permit expiration date (6/30/87). We, therefore, request an extension of the subject permits for 60 days (to 8/29/87).

Your attention to this matter is greatly appreciated. If you have any questions or require additional information, please call me at (904) 433-7631 Ext. 543.

Sincerely,

Robert W. Clarke

Robert W. Clarke
Senior Environmental Engineer

RWC:mab

- cc: R. J. Bryan - Reichhold, Pensacola
- E. G. Fleming - Reichhold, Pensacola
- T. Herron - DER, Tallahassee
- M. J. Kowalski - Reichhold, White Plains
- J. Preece - DER, Pensacola

P 408 531 147

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. G. B. Mitrovich	
Street and No.	
P.O., State and ZIP Code	
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 1/28/87	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 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. <u>The return receipt fee will provide you the name of the person delivered to and the date of delivery.</u> For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.	
1. <input type="checkbox"/> Show to whom, date and address of delivery.	
2. <input type="checkbox"/> Restricted Delivery.	
3. Article Addressed to: Mr. G. B. Mitrovich Reichhold Chemicals, Inc. P. O. Box 1433 Pensacola, FL 32596	
4. 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	Article Number P 408 531 147
Always obtain signature of addressee or agent and <u>DATE DELIVERED.</u>	
5. Signature - Addressee X	
6. Signature - Agent X <i>JTB Gads</i>	
7. Date of Delivery JAN 30 1987	
8. Addressee's Address (ONLY if requested and fee paid)	

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

January 22, 1987

Mr. G. B. Mitrovich
Reichhold Chemicals Inc.
407 South Pace Boulevard
Post Office Box 1433
Pensacola, Florida 32596

Dear Mr. Mitrovich:

Re: AC 17-098127 - Terpene-Phenol Resin Facility
AC 17-104265 - Resin Flaking and Bag Packaging Facility

The department received your letter, dated December 23, 1986, which requested an extension of the expiration date of the above referenced permits. This request is acceptable and the expiration date is changed as follows:

From: December 31, 1986
To: June 30, 1987

A copy of this letter must be attached to the referenced construction permit and shall become a part of the permit.

Attachment to be Incorporated:

Mr. G. B. Mitrovich's letter of December 23, 1986.

Sincerely,

Howard L. Rhodes, P.E.
Director, Division of
Environmental Programs

HLR/ks

cc: J. Preece

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
From: _____ DATE: _____

TO: Howard L. Rhodes, Director
FROM: C. H. Fancy, Deputy Chief, BAQM
DATE: January 22, 1987
SUBJ: Modifications of Conditions

A handwritten signature in black ink, appearing to read "C. H. Fancy", is written over the signature line of the routing slip.

RECEIVED
JAN 22 1987

DIRECTOR - PROGRAMS

Attached for your approval and signature are five letters that will extend the expiration dates of the following air construction permits:

- AC 48-118328, Cirtus Central, Inc.
- AC 16-100644, USG Corporation
- AC 05-103832, Kennedy Space Center
- AC 65-115861 and AC 65-109412, Olin Corporation
- AC 17-098127 and AC 17-104265, Reichhold Chemicals Inc.

The bureau recommends these extensions be approved.

CHF/s

attachments

DER

JAN 23 1987

BAQM

Reichhold Chemicals, Inc.

Chemical Coatings Division
407 South Pace Boulevard
P.O. Box 1433
Pensacola, Florida 32596

3091 11/18/86

REICHHOLD

Dec. 23, 1986

Mr. Thomas W. Moody, PC
Florida Department of Environmental Regulation
160 Governmental Center
Pensacola, FL 32501

RE: Construction Permits AC17-098127
AC17-104265

EDM

Dear Mr. Moody:

We have recently tested the process vents required under our construction permit for Reichhold's new Terpene-Phenol Resin Facility. Tests were originally scheduled for late October but because of equipment problems they were conducted later than planned and the test report was received last week. A copy of the test report is attached.

We are currently evaluating the test results, but a preliminary review suggests that additional tests and/or process modifications will be required in order to assure that the unit will meet all requirements set forth in the permit.

We request an extension of the above permits of 180 days to June 30, 1987; 90 days will be required for additional testing and evaluation and 90 days for DER review of an operating permit.

Your attention to this matter is greatly appreciated. If you have any questions, please call me at 433-7621 ext. 337 or Bob Clarke at 433-7621 ext. 543.

Sincerely,

G. B. Mitrovich

G. B. Mitrovich
Pensacola Plant Engineer

GBM/nb

pc R. P. Aston - Reichhold
R. Clarke - Reichhold

RECEIVED

DEC 24 1986

NORTHWEST FLORIDA
DER

DER

JAN 6 1987

BAQM

BEST AVAILABLE COPY

DEPARTMENT

Bill T-

1/20

**ROUTII
TRANSM**

1. TO: (NAME, OFFICE, LO)

Chair

2.

BAQ1

3.

DER

4.

Tak

please process permit extension letter. Appears as though request was rec'd by DER before permit expired (I hope so).

Chair

REMARKS:

Please react to the requested extensions of permits in Paragraph 3.

The district shall follow up on test results and requirements for operating permits

FROM:

Jan S. Heese

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DATE

Jan 5, 1987

PHONE

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

November 20, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Robert P. Aston
Plant Manager
Chemical Coatings Division
407 South Pace Boulevard
Post Office Box 1433
Pensacola, Florida 32596

Dear Mr. Aston:

Re: Modification of Conditions
Permit No. AC 17-098127
Permit No. AC 17-104265

The department received your letter, dated October 14, 1986, which requested an extension of the expiration date of the above referenced permits to construct a terpene-phenol resin facility and a resin flaking and bag packaging facility at your chemical complex. This request is acceptable and the expiration date is changed as follows:

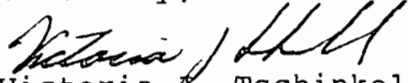
From: October 31, 1986
To: December 31, 1986

A copy of this letter must be attached to the referenced construction permit and shall become a part of this permit.

Attachment to be Incorporated:

Mr. Gerald B. Mitrowick's letter of October 14, 1986.

Sincerely,


Victoria J. Tschinkel
Secretary

VJT/ks

cc: J. Preece

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

TO: Victoria J. Tschinkel
FROM: Clair Fancy *Clair Fancy*
DATE: November 20, 1986
SUBJ: Extension of Permit No. AC 17-098127 and AC 17-104265
Reichhold Chemicals

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	LOCTN: _____
To: _____	LOCTN: _____
To: _____	LOCTN: _____
FROM: _____	DATE: _____

Attached for your approval and signature is a letter extending the expiration date of the above referenced permits.

CF/pa

Attachment

Reichhold Chemicals, Inc.

Chemical Coatings Division
407 South Pace Boulevard
P.O. Box 1433
Pensacola, Florida 32596

REICHHOLD

Oct. 14, 1986

Mr. Thomas W. Moody, PE
Florida Department of Environmental Regulation
160 Governmental Center
Pensacola, FL 32501

Re: Construction Permits AC17-098127
AC17-104265

Dear Mr. Moody:

We have experienced delays in the construction and start-up of our Terpene-Phenol Resin Facility at the Pensacola plant. These delays have impacted our ability to perform compliance testing necessary for the application of an Operating Permit for the unit.

Testing is scheduled for October 30, 31, 1986 and will be performed by ATC, Incorporated. The test plan for the stack tests is attached. (Because of the time involved in testing and analysis, we request an extension of the above construction permits of 60 days to December 31, 1986.) We would also welcome observation of the testing by representatives of your department.

Your attention to this matter is greatly appreciated. If you have any questions or comments on the testing, please call me at 433-7621 ext. 347.

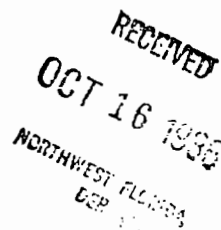
Sincerely,

GBM (nb)

Gerald B. Mitrovich, PE
Pensacola Plant Engineer

GBM/nb

pc Mr. Robert P. Aston -
Reichhold, Pensacola Plant Manager



P 408 530 288

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Everette E. Gerths	
Street and No.	
P.O., State and ZIP Code	
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 7/15/85	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 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 service(s) requested.

1. Show to whom, date and address of delivery.
2. Restricted Delivery.

3. Article Addressed to:
Mr. Everette E. Gerths
Reichhold Chemicals, Inc.
P. O. Box 1433
Pensacola, FL 32596

4. Type of Service: Article Number
 Registered Insured
 Certified COD
 Express Mail P. 408530288

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X *Melba Powell*

6. Signature - Agent
X

7. Date of Delivery
7/15/85

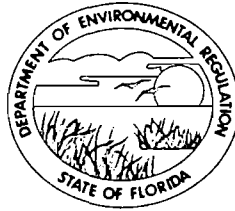
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Everette E. Gerths
Plant Manager
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

July 12, 1985

Enclosed is Permit Number AC 17-098127 Reichhold Chemicals, Inc. to construct a terpene-phenol resin facility, 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 32301; 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.

Sincerely,

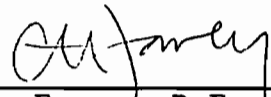
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Enclosure

cc: Arthur E. Moore
Thomas W. Moody

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on 15 July, 1985.



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

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.

Patricia G. Adams July 15, 1985
Clerk Date

Final Determination

Reichhold Chemicals, Inc.
Resins & Binders Division
Pensacola, Escambia County, Florida

Terpene-Phenol Resin Facility

Permit Number:
AC17-098127

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

July 1, 1985

Final Determination

Reichhold's application for a permit to construct a terpene-phenol resin facility at the Reichhold chemical complex, Escambia County, Florida, has been reviewed by the Bureau of Air Quality Management.

Public Notice of the Department's Intent to Issue the construction permit was published in the Pensacola Journal on May 17, 1985.

Copies of the preliminary determination have been available for public inspection at the Department's District office in Pensacola and the Bureau of Air Quality Management office in Tallahassee.

No comments were received as a result of the public notice period.

The final action of the Department will be to issue the permit as noticed during the public notice period.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Reichhold Chemicals, Inc.
Resins & Binders Division
407 South Pace Boulevard
P.O. Box 1433
Pensacola, Florida 32596

Permit Number: AC17-098127
Expiration Date: June 30, 1986
County: Escambia
Latitude/Longitude: 30° 24' 26" N/
87° 14' 35" W
Project: Terpene-Phenol Resin
Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 construction of a Terpene-Phenol Resin Facility to be located at the Reichhold Chemical Complex, building #133, in Pensacola, Escambia County, Florida.

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16).
2. Incompleteness letter of February 5, 1985.
3. Reichhold's letter of March 18, 1985 (responses to technical discrepancies).

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

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: AC17-098127
Expiration Date: June 30, 1986

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 noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

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 non-compliance 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:

- () 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: AC17-098127
Expiration Date: June 30, 1986

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:

Terpene-Phenol Resin Facility

1. This permit replaces current operating permit No. A017-73933. The applicant shall return this operating permit to the Department's district office after the new facility is in operation.
2. This facility shall be allowed to operate continuously (8,760 hours per year).
3. Total VOC emissions from the facility shall not exceed 15.4 tons per year (7.9 tons per year from the process and 7.5 tons per year from the storage tanks).

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

SPECIFIC CONDITIONS:

4. Compliance with the VOC emission standard will be determined by Method 25 or other methods approved by the department. Concentration data and calculated mass emission rate will be reported. Thereafter, compliance with the VOC emission limitations will be maintained based on the VOC inventory. The district office shall be notified 15 days prior to test.
5. Visible emissions shall not exceed 5% opacity during any 6 minute period. Compliance with this standard shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources as described in Appendix A of 40 CFR 60. The district office shall be notified 15 days prior to test.
6. No objectionable odors are allowed from this facility.
7. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the Department's district office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or issuance of an operating permit.
8. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the facility. Annual material balance reports (24-hour) shall be required and sent to the Department's district office to assess emissions and maintain VOC inventory. Visible emissions test shall be performed on an annual basis.
9. Construction shall reasonably conform to the plans submitted in the application.
10. The applicant shall report any delay in construction and completion of this project to the Department's district office.
11. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying road and construction sites will be taken by the applicant.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

SPECIFIC CONDITIONS:

Issued this 2nd day of July,
1985.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



DER

Interoffice Memorandum

JUL 3 1985

BAQM

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	LOC: _____
To: _____	LOC: _____
To: _____	LOC: _____
From: _____	DATE: _____

RECEIVED

JUL 2 1985

Office of the Secretary

TO: Victoria J. Tschinkel
FROM: Clair Fancy *(Signature)*
DATE: July 1, 1985
SUBJ: Approval of Attached Air Construction Permit

Attached for your approval and signature is one Air Construction Permit to Reichhold Chemicals, Inc. for the construction of a terpene-phenol resin facility in Pensacola, Escambia County, Florida.

Day 90, after which the permit would be issued by default, is July 23, 1985.

The Bureau recommends your approval and signature.

CF/pa

Attachment

Reichhold Chemicals, Inc.

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

DER

MAY 30 1985

BAQM

REICHHOLD

May 28, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. H. Fancy
Bureau of Air Quality Management
2600 Blainstone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

Enclosed is the notarized proof of publication of Notice of Proposed Agency Action required as part of our permit application for construction of a new terpene-phenol resin facility at Pensacola.

Also enclosed for your file is a letter designating Mr. Ellis G. Fleming as the newly authorized representative of the Pensacola, Florida plant. Please address any further correspondence to Mr. Fleming with copies to me.

Very truly yours,



Arthur E. Moore
Senior Project Engineer

AEM:jh
Enclosures

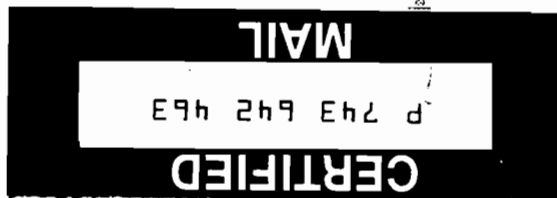
cc: Mr. R. W. Clarke, Reichhold
Mr. E. G. Fleming, Reichhold
Mr. A. R. Kulka, Reichhold
Mr. T. W. Moody, DER, Pensacola
Mr. D. E. Wentworth, Reichhold

Reichhold Chemicals, Inc.

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



CERTIFIED MAIL - RETURN RECEIPT REQUESTED



REICHHOLD

Mr. C. H. Fancy
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, FL 32301

The Pensacola Journal

PUBLISHED DAILY EXCEPT SUNDAY

PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,
County of Escambia.

Before the undersigned authority personally appeared

J. Diane Deal

who on oath says that she is Legal Advertising Supervisor of the Pensacola Journal, a daily (except Sunday) 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

J. Diane Deal

in the _____ Court,

was published in said newspaper in the issues of

May 17, 1985

Affiant further say that the said The Pensacola 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 except Sunday, 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

21st

day of *May*, A.D., 19*85*

Betty J. Penton

NOTARY PUBLIC.

My Commission Expires Oct. 16, 1987

LEGAL NOTICE

State of Florida
Department of
Environmental Regulation
Notice of
Proposed Agency
Action on
Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Reichhold Chemicals, Inc. Resins and Binders Division to construct a new terpene-phenol resins facility to replace the existing facility located at the Reichhold Chemical complex building No. 133, 407 South Pace Boulevard in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was not required.

Persons 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. The petition must conform to the requirements of Chapters 17-103 & 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have 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 for intervention must be filed pursuant to Model 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 32301. 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
Northwest District
160 Governmental Center
Pensacola, Florida 32501

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action, to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

Reichhold Chemicals, Inc.

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

REICHOLD

May 13, 1985

To Whom It May Concern:

Ellis G. Fleming is the authorized representative for the Reichhold Chemicals, Inc., Pensacola, Florida plant.

R. C. Sulick

R. C. Sulick
Vice President - Operations
Resins & Binders Division
Reichhold Chemicals, Inc.

No. 0155556

RECEIPT FOR CERTIFIED MAIL

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

SENT TO		Mr. Everette E. Gerths		
STREET AND NO.				
P.O., STATE AND ZIP CODE				
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢		
	SPECIAL DELIVERY	¢		
	RESTRICTED DELIVERY	¢		
	OPTIONAL SERVICES RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢	
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢	
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		¢		
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE		5/6/85		

PS Form 3800, Apr. 1976

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 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 service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Mr. Everet E. Gerths
Reichhold Chemicals, Inc.
P. O. Box 1433
Pensacola, FL 32596

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	0155556

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X *Shelva Powell*

6. Signature - Agent
X

7. Date of Delivery
5-8-85

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

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

May 6, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Everette E. Gerths
Plant Manager
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596


Dear Mr. Gerths:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to Reichhold Chemicals, Inc. to construct a new terpene-phenol resin facility to replace the existing facility in Pensacola, Escambia County, Florida.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Escambia County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

Please submit, in writing, any comments which 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/pa

Attachments

cc: Arthur E. Moore
Thomas W. Moody

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of an)
Application for Permit by:)
)
Reichhold Chemicals, Inc.) DER File No. AC 17-098127
Resins & Binders Division)
Post Office Box 1433)
Pensacola, Florida 32596)

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its Intent to Issue, and proposed order of issuance for, a permit pursuant to Chapter 403, Florida Statutes, 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 January 9, 1985, to DER for a permit to construct a new terpene-phenol resin facility to replace the existing facility 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 applicant was officially notified by the Department that an air construction permit was required for the proposed work.

This intent to issue shall be placed before the Secretary for final action unless an appropriate petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes, is filed within fourteen (14) days from receipt of this letter or

publication of the public notice (copy attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

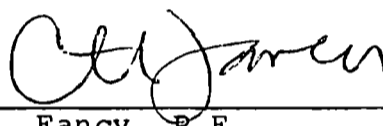
Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), 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 Model Rule 28-5.207 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, 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 32301. 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.

Executed the 1st day of May, 1985, 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:

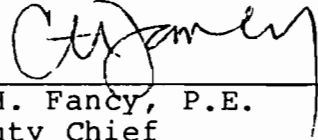
Everette E. Gerths
Plant Manager
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

Arthur E. Moore
Senior Project Engineer
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

Thomas W. Moody
Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501

CERTIFICATION

This is to certify that the foregoing Intent to Issue and all copies were mailed before the close of business on 6 May, 1985.



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

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

Clerk

Date

Technical Evaluation
and
Preliminary Determination

Reichhold Chemicals, Inc.
Resins & Binders Division
Pensacola, Escambia County, Florida

Terpene-Phenol Resin Facility

Permit Number:
AC17-098127

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

May 6, 1985

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Reichhold Chemicals, Inc., Resins and Binders Division to construct a new terpene-phenol resins facility to replace the existing facility located at the Reichhold Chemical complex, building #133, 407 South Pace Boulevard in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was not required.

Persons 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. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have 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 Model 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 32301. 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
Northwest District
160 Governmental Center
Pensacola, Florida 32501

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

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.

I. SYNOPSIS OF APPLICATION

I.1. NAME AND ADDRESS OF APPLICANT

Reichhold Chemicals, Inc.
Resins & Binders Division
P.O. Box 1433
Pensacola, Florida 32596

I.2. REVIEWING AND PROCESS SCHEDULE

Date of receipt of application: January 9, 1985.

Completeness Review (30 days):

Request for additional information: Incompleteness letter of February 5, 1985.

Response to Incompleteness letter: March 18, 1985.

Application's completeness date: March 18, 1985.

Date of Distribution of Proposed Agency Action and Preliminary Determination: May 6, 1985

Public Notice Period (30 days): "The applicant shall cause the notice to be published as soon as possible after notification by the Department of its intended action and no later than (14) days prior to final agency action. The applicant shall provide proof of publication to the Department within seven (7) days of publication. The application shall be held in abeyance until fourteen (14) days after publication. (Rule 17-1-62., Fla. Administrative Code)".

Permit Issuance: On or before 90 days after the application has been determined complete, providing the requirement of the public notice period has been met.

II. FACILITY INFORMATION

II.1. FACILITY LOCATION

The proposed facility will be located at the Reichhold Chemical complex, building #133, 407 South Pace Boulevard in Pensacola, Escambia County, Florida. The latitude and longitude of this site are 30° 24' 26" North and 87° 14' 35" West, respectively.

II.2. STANDARD INDUSTRIAL CLASSIFICATION CODE (SIC)

This new facility will be classified as follows:

Major Group 28 - CHEMICALS AND ALLIED PRODUCTS
Group No. 282 PLASTICS MATERIALS AND SYNTHETIC RESINS,
RUBBERS, AND FIBERS
Industry No. 2821 Plastics Production (Manufacturing
only)
SCC 3-01-018-05 Phenolic Resin

II.3. FACILITY CATEGORY

Reichhold Chemicals, Inc. is classified as a major emitting facility for particulate matter (PM) and hydrocarbon (VOC). The proposed project, replacing a terpene-phenol processing facility, will reduce the overall VOC emissions at Reichhold Chemical's complex by 52.42 tons per year.

This facility category, Chemical Process Plant, is on the list of the the 28 Major Facility Categories, Table 500-1, Chapter 17-2, Florida Administrative Code.

III. PROJECT DESCRIPTION

The proposed project consists of constructing a new terpene-phenol resin facility to replace the existing facility. This new facility will incorporate improved emissions control systems and monitoring devices which are not used in the existing process unit and which will improve the efficiency and reliability of the control system.

III.1. BACKGROUND INFORMATION

An air pollution source inventory was conducted by the company in a response to the incompleteness letter sent by the Department. It was concluded that the greatest emissions at the Reichhold Chemicals complex are particulate matter (385 tons per year) and volatile organic compounds (311.6 tons per year).

The industrial manufacturing processes at the Pensacola plant are: polyterpene resins, synthetic resins from modified wood and tall oil rosin, alkyd resins from various vegetable oils and fatty acids, epoxy resins and rosin esters. In addition, a fractional distillation of citrus limonene is performed. The product from this process, primarily d-l-limonene, is the major feedstock for the polyterpene resin process.

All resinous materials, both liquids and solids are stored at room temperature, and are shipped in solid form in metal resin drums, in the flaked or crushed form in bags, or as solutions in various solvents, such as toluene or xylene, in sealed drums or tank trucks.

IV. PROCESS DESCRIPTION AND POLLUTION CONTROL SYSTEMS

Process Description:

The process for making terpene-phenol resins consists of reacting a terpene monomer with phenol, C₆H₅OH, in the presence of a catalyst and heating them to a certain temperature, of which a resinous mass is formed. The water is boiled off and the resinous product is allowed to cool in thin layers. The reaction can be arrested with a solvent.

Controls:

All tanks for storage of volatile organic compounds at ambient temperature will be equipped with vapor conservation vents to reduce emission of these materials. All points of potential emissions from the process where volatile materials are handled above ambient temperature will be controlled with water-cooled condensers to prevent loss of these materials. The vents from these condensers will be equipped with temperature indicators having remote readouts and alarms in the process control room. All readings will be automatically recorded and printed out by the process control computer.

V. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The proposed facility, a terpene-phenol resin facility, is located at Reichhold Chemical complex in an area (Escambia County) currently designated attainment for all criteria pollutants in accordance with Florida Administrative Code, Rule 17-2.420.

Reichhold Chemicals, Inc., is a major emitting facility for particulate matter (385 tons per year) and volatile organic compounds (311 tons per year), as defined in Rule 17-2.100, Florida Administrative Code.

This facility category, Chemical Process Plant, is in the list of the 28, Table 500-1. Major Facility Category, Rule 17-2.500, Florida Administrative Code.

The proposed project is exempt from provisions of Rule 17-2.500, Prevention of Significant Deterioration because its emissions do not exceed the PSD significance levels.

The proposed project shall be permitted under Rule 17-2.520, Sources not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The proposed facility shall comply with Rule 17-2.610(2), General Particulate Emission Limiting Standards, and Rule 17-2.620(1) and (2), General Pollutant Emission Limiting Standard.

VI. SOURCE IMPACT ANALYSIS

VI.1. EMISSION SUMMARY

The processing of a terpene-phenol resin will produce emissions of volatile organic compounds (VOC), specifically phenol, toluene, naphtha, pinene and dimer (mixed aromatic and aliphatics).

The estimated potential VOC emissions due to the storage of raw materials and products along with the process emission losses are summarized in Table 1.

All chemical compounds used during the process and their emissions are limited by permit conditions. These permitted emissions are in compliance with all applicable requirements of Chapter 17-2 Florida Administrative Code.

The existing permitted old terpene-phenol resin facility will be completely closed down as soon as the proposed new facility is operating. Based on product weight, it is estimated that emissions from this source will be reduced by 58% when compared with the existing process facility. Overall VOC emissions decrease at the Reichhold Chemical complex will be 52.42 tons per year.

VI.2. AIR QUALITY ANALYSIS

From a technical review of the application, the Department has determined that the construction and operation of these sources will not have a detrimental impact on Florida's ambient air quality standards.

VII. CONCLUSIONS

Based on a review of the data submitted by Reichhold, the Florida Department of Environmental Regulation (FDER) concludes that compliance with all applicable state air quality regulations will be achieved, provided certain specific conditions are met. The impact of construction and operating a terpene-phenol resin facility at the Pensacola plant will not cause or contribute to a violation of any ambient air quality standard.

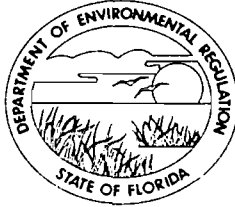
TABLE 1
 SUMMARY OF EMISSIONS
 (Tons per year)

<u>SOURCE:</u>	<u>POLLUTANT:</u>
Terpene-phenol process	VOC
Existing facility	67.80 (actual emissions)
Proposed new facility	7.90
 Storage Tanks	
Evaporation loss	3.15
Working loss	4.33
 Total Emissions - New facility	15.38
Net emissions change	-52.42
PSD significance emission rate	40.00

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Reichhold Chemicals, Inc.
Resins & Binders Division
407 South Pace Boulevard
P.O. Box 1433
Pensacola, Florida 32596

Permit Number: AC17-098127
Expiration Date: June 30, 1986
County: Escambia
Latitude/Longitude: 30° 24' 26" N/
87° 14' 35" W
Project: Terpene-Phenol Resin
Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 construction of A Terpene-Phenol Resin Facility to be located at the Reichhold Chemical Complex, building #133, in Pensacola, Escambia County, Florida.

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16).
2. Incompleteness letter of February 5, 1985.
3. Reichhold's letter of March 18, 1985 (responses to technical discrepancies).

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

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: AC17-098127
Expiration Date: June 30, 1986

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 noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

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 non-compliance 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:

- () 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: AC17-098127
Expiration Date: June 30, 1986

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:

Terpene-Phenol Resin Facility

1. This permit replaces current operating permit No. A017-73933. The applicant shall return this operating permit to the Department's district office after the new facility is in operation.
2. This facility shall be allowed to operate continuously (8,760 hours per year).
3. Total VOC emissions from the facility shall not exceed 15.4 tons per year (7.9 tons per year from the process and 7.5 tons per year from the storage tanks).

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

SPECIFIC CONDITIONS:

4. Compliance with the VOC emission standard will be determined by Method 25 or other methods approved by the department. Concentration data and calculated mass emission rate will be reported. Thereafter, compliance with the VOC emission limitations will be maintained based on the VOC inventory. The district office shall be notified 15 days prior to test.
5. Visible emissions shall not exceed 5% opacity during any 6 minute period. Compliance with this standard shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources as described in Appendix A of 40 CFR 60. The district office shall be notified 15 days prior to test.
6. No objectionable odors are allowed from this facility.
7. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the Department's district office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or issuance of an operating permit.
8. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the facility. Annual material balance reports (24-hour) shall be required and sent to the Department's district office to assess emissions and maintain VOC inventory. Visible emissions test shall be performed on an annual basis.
9. Construction shall reasonably conform to the plans submitted in the application.
10. The applicant shall report any delay in construction and completion of this project to the Department's district office.
11. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying road and construction sites will be taken by the applicant.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-098127
Expiration Date: June 30, 1986

SPECIFIC CONDITIONS:

Issued this _____ day of _____,
19____.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

Reichhold Chemicals, Inc.

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

DER
MAR 18 1985
BAQM

REICHHOLD

March 14, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. H. Fancy
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

In reply to your letter dated February 5, 1985, enclosed is the additional information you requested regarding our application for a permit to construct a new terpene-phenol resin facility at the Reichhold Chemicals, Inc. Pensacola plant.

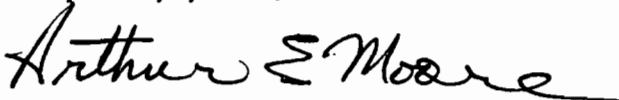
The existing permitted old terpene-phenol resin facility will be completely closed down as soon as the proposed new facility is operational.

A copy of Page 2 of the application with the professional engineer's seal is also enclosed for your files.

It was our understanding that since the proposed new facility will provide a decrease in emissions, PSD regulations will not apply. This was discussed and confirmed by our Mr. R. W. Clarke and your Mr. Bill Thomas on March 4, 1985.

If there is any other information needed to expedite processing of this application, please contact us immediately.

Very truly yours,



Arthur E. Moore
Senior Project Engineer

AEM:jh

Enclosures

cc: Mr. R. W. Clarke, Reichhold
Mr. E. G. Fleming, Reichhold
Mr. E. E. Gerths, Reichhold
Mr. A. R. Kulka, Reichhold
Mr. J. Preece, DER, Pensacola
Mr. D. E. Wentworth, Reichhold

PENSACOLA TERPENE-PHENOL RESIN PROCESS

Construction Permit Application

Additional Information Requested

Item #1 Industrial Manufacturing Processes at Pensacola:

1. Chemical reaction processes to produce the following:
 - a. Polyterpene resins
 - b. Synthetic resins from modified wood and tall oil rosin
 - c. Alkyd resins from various vegetable oils and fatty acids
 - d. Epoxy resins and hardeners
 - e. Rosin esters

All of the above products are resinous materials, both liquids and solids at room temperature, and are shipped in solid form in metal resin drums, in flaked or crushed form in bags, or as solutions in various solvents such as toluene or xylene, in sealed drums or tank trucks.

2. Fractional distillation of citrus limonene:

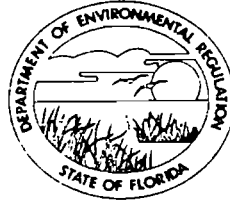
The product from this process, primarily d-l-limonene, is the major feedstock for the polyterpene resin process.

Items #2, #3, and #4

The processes, permits, and air emissions for sources at the Pensacola plant are listed in the following table. The table includes information requested in item #4.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501



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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Resin Manufacturing Process New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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) Terpene-phenol Resin
Manufacturing Process - Bldg #133 - Vents 133 - 1 through 133-8

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East _____ North _____

Latitude 30 ° 24 ' 26 "N Longitude 87 ° 14 ' 35 "W

APPLICANT NAME AND TITLE: Everett E. Gerths, Plant Manager

APPLICANT ADDRESS: P. O. Box 1433, Pensacola, FL 32596

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold Chemicals, Inc.

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: 

Letter of authorization on file at
Pensacola DER office.

Everette E. Gerths, Plant Manager
Name and Title (Please Type)

Date: 1/8/85 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

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

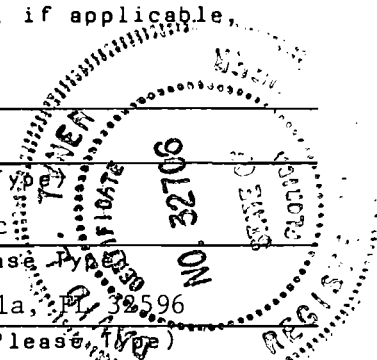
the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the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

Individual to contact regarding this Signed application:

David L. Tyner
David L. Tyner

Arthur E. Moore
Arthur E. Moore, Senior Project Engineer
Reichhold Chemicals, Inc.
P. O. Box 1433, Pensacola, FL 32596
(904)478-6379

Name (Please Type)
Reichhold Chemicals, Inc.
Company Name (Please Type)
P. O. Box 1433, Pensacola, FL 32596
Mailing Address (Please Type)



Florida Registration No. 32706 Date: 1/8/85 Telephone No. (904)478-6379

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 construction of a new resin production facility to replace existing processing facilities at the Pensacola plant. The new facility will incorporate improved emissions control systems and monitoring devices which are not used in the existing process unit and which will improve the efficiency and reliability of the control system. See Process Description, Emissions & Controls, and Process flow sheets attached. Based on product weight, it is estimated that emissions from this source will be reduced by 58% as compared with the existing process facilities.
- B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction March 1, 1985 Completion of Construction September 1, 1985
- 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.)
Tank Conservations Vents - \$20,000
Reactor Feed Tanks Vent Condenser - \$4,500
Polymer Tanks Vent Condenser - \$4,500
Temperature Indicator/Alarm Loops (6) - \$6,000
- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
This new facility will replace existing process facilities permitted under permit number A017-73933 issued October 13, 1983 and expiring September 1, 1988. The old existing facilities will be shut down and dismantled when the new facility starts up.

<u>Permit No.</u>	<u>Process</u>	<u>Pollutant</u>	<u>TPY Actual</u>	<u>TPY Potential</u>
A017-81419	* Industrial Steam Boiler #8	Particulates	*0	72.4
A017-81423	* Industrial Steam Boiler #9	Particulates	*0	90.5
A017-81424	Industrial Steam Boiler #10	Particulates	147.2	153.1
A017-93688	Dowtherm Heater #1 3 Million BTU/Hr Max Input Natural Gas Only	Particulates NOx HC S02	.044 .375 .100 .001	.048 .406 .108 .0011
A017-93689	Dowtherm Heater #2 3 Million BTU/Hr Max Input Natural Gas Only	Particulates NOx HC S02	.037 .312 .083 .001	.040 .338 .09 .0011
A017-93690	Reactor #7 Furnace 6 Million BTU/Hr Natural Gas Only	Particulates NOx HC S02	.055 .363 .122 .002	.220 .45 .408 .008
A017-81422	Resin Flaking & Bagging Building #65	Particulates Resin Dust	0.42	14.2
A017-73934	Resin Flaking & Bagging Building #56	Particulates Resin Dust	0.88	13.7
A017-73937	Resin Crushing & Bagging Building #91	Particulates Resin Dust	.052	5.2
A017-60662	Flaker Baghouse - South Plant Flaking & Crushing	Particulates Resin Dust	.36	36

Permit No.	Process	Pollutant	Emissions			
			Actual	Potential		
A017-81420	Polyterpene Resin Process	Hydrocarbons	86.9 TPY	96.6 TPY		
	<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
A017-73935	Zinc Resinate Process	Hydrocarbons	19.8 TPY	52.65 TPY		
	<u>Hydrocarbon</u> <u>Generic Name</u> <u>Vapor Pressure</u>	- Mineral Spirits - Aliphatic HC - 1.4 mm Hg @ 70°F	Rosin Oil Disproportionated Wood Rosin .003mm Hg @ 100°F			
A017-73935	Organic Coatings Process	Hydrocarbons	8.75 TPY	50.5 TPY		
	<u>Hydrocarbon</u> <u>Generic Name</u> <u>Vapor Pressure</u>	- VM&P Aliphatic HC - 15mm Hg @ 100°F	Mineral Spirits Aliphatic HC 1.4mm Hg @ 20°F	Vinyl Toluene Aromatic HC 1.1 mm Hg @ 68°F		
A017-73933	**Terpene-Phenol Resin Process	Hydrocarbons	67.8 TPY	72.0 TPY		
	<u>Hydrocarbon</u> <u>Generic Name</u> <u>Vapor Pressure</u>	- Alpha Pinene - Terpene HC - 9 mmHg @ 100°F	Toluene Aromatic HC 22 mm Hg @ 68°F	VM&P Naphtha Aliphatic HC 15mm Hg @ 100°F	Phenol Aromatic HC 0.1mm Hg @ 68°F	Dimer Mixed Aro/Ali HC <0.05mm Hg @ 100°C
A017-81421	* Paramenthane Hydroperoxide Process	Hydrocarbons	*0 TPY	39.8 TPY		
	<u>Hydrocarbon</u> <u>Generic Name</u> <u>Vapor Pressure</u>	- Paramenthane Terpene HC - 7 mm Hg @ 100°F				

<u>Permit No.</u>	<u>Process</u>	<u>Pollutant</u>	<u>TPY Actual</u>	<u>TPY Potential</u>
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 & Traces of Hydrocarbons (Resin Oils)	*0	

*These processes are no longer operating and there are no current plans to reactive these units.

**Existing operation to be replaced by proposed new facility.

Current Total Emissions for Pensacola Facility

	<u>TPY Actual</u>	<u>TPY Potential</u>
Particulates	149.05	385.41
Hydrocarbons	183.6	311.6
N0x	1.05	1.2
S02	0.004	0.01

Item #5 Emissions from Terpene-Phenol Resin Process:

Present permitted emissions under Permit A017-73933 (Estimate based on material balance information) from old facility 67.8 T/yr

Proposed Emissions From New Facility at Max Capacity of 20MM lbs/yr (Calculated per EPA Publication AP-42) 7.9 T/yr

NET EMISSIONS DECREASE (i.e. OLD VS NEW FACILITY) 59.9 T/yr

Better physical data as well as a more accurate method of predicting hydrocarbon emissions has been obtained since the original construction permit application was developed. Attached is a revised page 4 of the application and a revised page 2 of attachment #1 reflecting the newly calculated emissions rates. Also attached are tables showing evaporation, working, and process emissions losses calculated per EPA publication AP-42.

APPLICATION INFORMATION - DER FORM 17-1.202(1)

Project Description

Boiler

The plant steam boiler (re: dimer oil to boiler fuel shown on the process flow diagram) is an independent item covered under the boiler permit. The dimer is presently being shipped to other Reichhold plants along with other by-products for boiler fuel. It is expected that this condition will continue unless there is a natural gas curtailment, requiring the use of stand-by fuel for the Pensacola plant boiler.

Conservation Vents

Pressure Settings - 2 oz/sq. in. pressure
1 oz/sq. in. vacuum

<u>Vent No.</u>	<u>ID</u>	<u>Description</u>
133-1	3"	Dehydrator Reflux Condenser
133-2	3"	Reactor Feed Tanks Vent Condenser
133-3	6"	Reactor Vent Scrubber Vent
133-4	6"	Quench Tank Vent
133-5	3"	Polymer Storage Tanks Vent
133-6	3"	Vacuum Pump Discharge
133-7	3"*	Resin Storage Tanks Vent
133-8	12"	Hot Oil Furnace Stack

*Two via common 6")

Reactor Vent Contact Water Scrubber Parameters

Water Flow = 2 gpm
Operating Pressure = Atmospheric
Diameter = 12"
Height = 6"
Packing = Teflon Mesh
 ΔP = 2 inches water

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		
Petroleum Naptha				
Toluene				
Phenol			6710	SKA-1972
Terpene Monomer				
Wash Water & Catalyst				

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 6710 (at design capacity)

2. Product Weight (lbs/hr): 6071 (at design capacity)

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Hydrocarbons	16.7	7.9			See attached		SKA-1972
(See attached process description, material balance, and estimated emissions calculations based on EPA Publication AP-42)					process description, material balance, and estimated emissions calculations based on EPA Publication AP-42		

¹See Section V, Item 2.

²Reference 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)

³Calculated from operating rate and applicable standard.

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

No. 0158651
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		Mr. Everett Gerths	
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES:	RETURN RECEIPT SERVICE	¢
		SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE	¢		
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢		
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢		
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		2/8/85	

PS Form 3800, Apr. 1976

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 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 service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
 Mr. Everett E. Gerths
 Reichhold Chemicals, Inc.
 P. O. Box 1433
 Pensacola, FL 32596

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	0158651

Always obtain signature of addressee or agent and **DATE DELIVERED.**

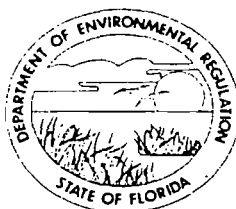
- Signature - Addressee
 X *Steve Gil*
- Signature - Agent
 X
- Date of Delivery
 2-11-85
- Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 5, 1985

Mr. Everett E. Gerths, Plant Manager
Reichhold Chemicals, Inc.
P. O. Box 1433
Pensacola, Florida 32596

Dear Mr. Gerths:

The Bureau of Air Quality Management has received your application for a permit to construct a terpene-phenol resin facility at Reichhold's chemical complex in Pensacola.

Based on our initial review of your proposal, it has been determined that additional information is needed in order to determine whether your application must be reviewed under the Prevention of Significant Deterioration (PSD) rule as a modification to a major facility. The information needed is as follows:

Air Pollution Inventory System (APIS) Information:

1. What are the other industrial processes performed at your Pensacola Plant besides the manufacture of phenolic-resin?
2. What are the criteria and non-criteria pollutants emitted at your facility? Please specify (enumerate) each chemical process and each source of air emissions related to each individual chemical process.
3. Please submit an air emission inventory of all permitted sources and their potential and actual emissions (in tons per year).
4. When listing hydrocarbon emissions (VOC) please indicate chemical composition, generic name and vapor pressure of each compound.
5. What are the actual emissions from the existing facility (Permit AO 17-73933)? What will be the net emission change (increase or decrease in TPY) as a result of the new installation?

Mr. Everett E. Gerths
Page Two
February 5, 1985

Rule Applicability

1. Based on the data presented, the modification to your facility (replacing the existing facility, Permit No. AO 17-73933) would result in a significant emissions increase for VOC (>40 tons per year). Therefore, your project will be subject to PSD regulations.

PSD review requires the use of Best Available Control Technology (BACT), determination of the ambient air impact and preconstruction air quality monitoring and analysis. Please refer to Florida Administrative Code Rule 17-2.500 PSD.

APPLICATION INFORMATION - DER Form 17-1.202(1)

PROJECT DESCRIPTION

Boiler

Will any additional types of fuel be used to fire the boiler? If so, provide the emission rates for that fuel. Will this boiler operate independently of the resin process? What is the maximum heat input?

Conservation Vent

Specify pressure and vacuum setting of all conservation vents and valves.

The department considers a vent the same as stack, please give internal diameters size (I.D.) for each conservation vent.

What are the parameters of the contact water scrubber (AP, water flow, pressure, etc.)?

Please estimate VOC evaporation loss (in tons per year) from the storage tanks?

Section I.B

Please send a copy of page of 2 of 12 with the Professional Engineer's seal for our files.

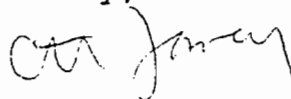
Mr. Everett Gerths
Page Three
February 5, 1985

Confidential Records

Pursuant to Section 403.111, Florida Statutes, the review committee will insure confidentiality of the information as requested. Please indicate and separate all information you consider to be confidential.

As soon as the requested information is received, we will resume processing your application. If you have any questions on this matter, please call Bill Thomas on rule applicability and Teresa Heron on the other data requested at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/TH/s

cc: Jack Preece, DER Northwest District

REICHOLD®

CORPORATE HEADQUARTERS: 525 NORTH BROADWAY, WHITE PLAINS, NEW YORK 10603

TELEPHONE: (914) 682-5700

TWX: 7105681373

CABLE: BECKACITE WHITE PLAINS

January 7, 1985

DER

JAN 9 1985

BAQM

Address Reply To
REICHOLD CHEMICALS, INC.
Resins & Binders Division
407 South Pace Boulevard
P. O. Box 1433
Pensacola, Florida 32596
(904) 433-7621

Mr. Clair Fancy
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

Enclosed is a construction permit application for a new resin facility we will be building at our Pensacola plant. As indicated in the application, this new unit will replace existing facilities now operating under permit number A017-73933 and these old facilities will be shut down and dismantled when the new unit starts up. As a result of the new installation, emissions from this process will be reduced by an estimated 58% when compared on a product weight basis. Also enclosed is a check in the amount of \$500 covering the permit application fee.

If you have any questions or need additional information regarding this application, please contact me at (904) 478-6379.

Very truly yours,

REICHOLD CHEMICALS, INC.



Arthur E. Moore
Senior Project Engineer
Resins & Binders Division

AEM:jh
Attachments

cc: Mr. Robert V. Kriegel - DER, Pensacola (w/attachment)
Mr. Thomas W. Moody - DER, Pensacola (w/attachment)
Mr. E. G. Fleming - Reichhold, Pensacola (w/o attachment)
Mr. E. E. Gerths - Reichhold, Pensacola (w/attachment)
Mr. A. R. Kulka - Reichhold, Pensacola (w/o attachment)
Mr. O. U. Thomas - Reichhold, Pensacola (w/o attachment)
Mr. T. R. Madden - Reichhold, Elizabeth (w/o attachment)
Dr. A. F. Vickers - Reichhold, White Plains (w/o attachment)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



DER

JAN 9 1985

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROBERT V. KRIEGL
DISTRICT MANAGER

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Resin Manufacturing Process [x] New¹ [] Existing¹

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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) Terpene-phenol Resin Manufacturing Process - Bldg #133 - Vents 133 - 1 through 133-8

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East _____ North _____

Latitude 30 ° 24 ' 26 "N Longitude 87 ° 14 ' 35 "W

APPLICANT NAME AND TITLE: Everett E. Gerths, Plant Manager

APPLICANT ADDRESS: P. O. Box 1433, Pensacola, FL 32596.

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold Chemicals, Inc.

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: *Everett E. Gerths*

Letter of authorization on file at Pensacola DER office.

Everette E. Gerths, Plant Manager
Name and Title (Please Type)

Date: 1/8/85 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

¹ 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.

Individual to contact regarding this application: Signed _____

David L. Tyner
David L. Tyner

Name (Please Type)

Arthur E. Moore

Arthur E. Moore, Senior Project Engineer
Reichhold Chemicals, Inc.
P. O. Box 1433, Pensacola, FL 32596
(904)478-6379

Reichhold Chemicals, Inc.

Company Name (Please Type)

P. O. Box 1433, Pensacola, FL 32596

Mailing Address (Please Type)

Florida Registration No. 32706 Date: 1/8/85 Telephone No. (904)478-6391

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 construction of a new resin production facility to replace existing processing facilities at the Pensacola plant. The new facility will incorporate improved emissions control systems and monitoring devices which are not used in the existing process unit and which will improve the efficiency and reliability of the control system. See Process Description, Emissions & Controls, and Process flow sheets attached. Based on product weight, it is estimated that emissions from this source will be reduced by 58% as compared with the existing process facilities.
- B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction March 1, 1985 Completion of Construction September 1, 1985
- 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.)
Tank Conservations Vents - \$20,000
Reactor Feed Tanks Vent Condenser - \$4,500
Polymer Tanks Vent Condenser - \$4,500
Temperature Indicator/Alarm Loops (6) - \$6,000
- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
This new facility will replace existing process facilities permitted under permit number A017-73933 issued October 13, 1983 and expiring September 1, 1988. The old existing facilities will be shut down and dismantled when the new facility starts up.

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wka/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: Operational schedule will vary
from 5 days per week, 40 weeks per year to above stated operating rate depending
on product demand.

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		
Petroleum Naptha				
Toluene				
Phenol			6710	SKA-1972
Terpene Monomer				
Wash Water & Catalyst				

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 6710 (at design capacity)
- Product Weight (lbs/hr): 6071 (at design capacity)

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Hydrocarbons	16.7	63.2			See attached		SKA-1972
(See attached process description, material balance and estimated emissions calculations).					process description, material balance, and estimated emissions calculations.		

¹See Section V, Item 2.

²Reference 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)

³Calculated from operating rate and applicable standard.

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

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)
Conservation Vents Groth Model 1200 or equal	Hydrocarbon Vapors	NA	NA	See attached product bulletin
* Reactor Feed Tank Vent Condenser	Hydrocarbon Vapors	99.5%	NA	Typical for design
* Polymer Tank Vent Condenser	Hydrocarbon Vapors	99.5%	NA	Typical for design
(*See attached heat exchanger specification sheets)				

E. Fuels Not Applicable

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

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

Not applicable
Annual Average _____ Maximum _____

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

Wastewater from catalyst neutralization is disposed of to plant wastewater system.

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

Stack Height: Not applicable ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ 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) ³	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: _____

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

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.

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

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

Yes No

Contaminant	Rate or Concentration

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

Not applicable

Contaminant	Rate or Concentration

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

Not applicable

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

7. Energy:

9. Emissions:

6. Operating Costs:

8. Maintenance Cost:

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):

Not applicable

1.
 - a. Control Device: _____
 - b. Operating Principles: _____
 - c. Efficiency:¹ _____
 - d. Capital Cost: _____
 - e. Useful Life: _____
 - f. Operating Cost: _____
 - g. Energy:² _____
 - 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:¹ _____
 - d. Capital Cost: _____
 - e. Useful Life: _____
 - f. Operating Cost: _____
 - g. Energy:² _____
 - h. Maintenance Cost: _____
 - i. Availability of construction materials and process chemicals: _____

¹Explain method of determining efficiency.
²Energy 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:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

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:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

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:

Not applicable

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

Not applicable.

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

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 ²	_____ grams/sec

E. Emission Data Used in Modeling

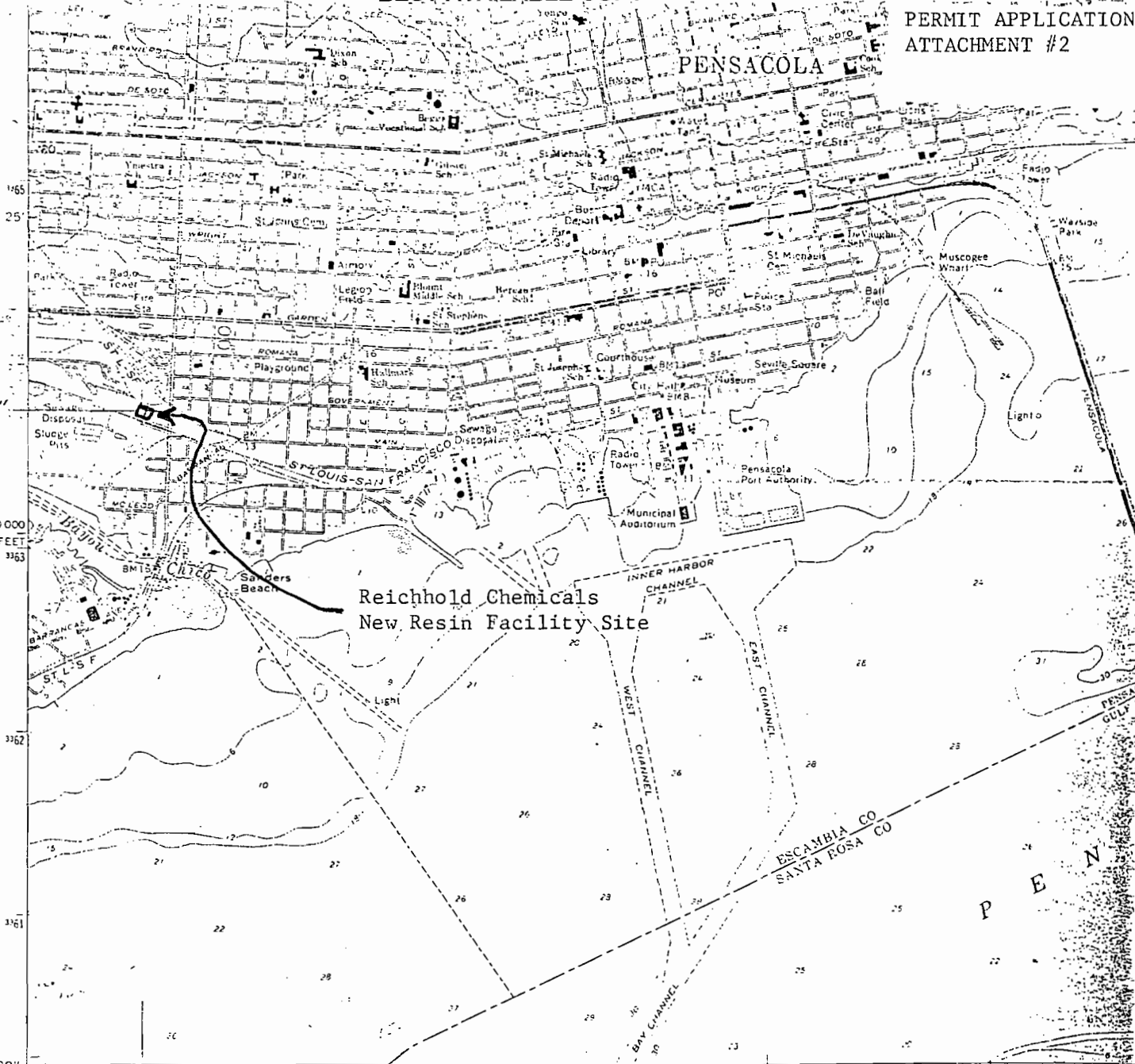
Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

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.

~~RE~~
ATTACHMENT 1 , 2 PAGES
SEE CONFIDENTIAL
FILES.



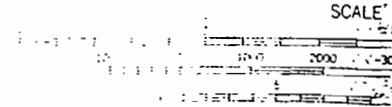
W 89°55'22"
N 30°24'26"

30°24'26"

520 000
FEET
3363

30°22'30" 87°15' 87°14'35" 177 478 1:400 000 FEET 478 18'30" 181 (GULF B 3544)

Mapped, edited, and published by the Geological Survey
 Control by USGS and USC&GS
 Topography by photogrammetric methods from aerial photographs
 taken January 1965, March 1965 and January 1966
 Field checked 1970
 Selected hydrographic data compiled from USC&GS Charts
 490 and 1255 (1965)
 This information is not intended for navigational purposes
 Polyconic projection, 1927 North American datum
 10,000-foot grid based on Florida coordinate system, north zone
 1000-meter Universal Transverse Mercator grid ticks
 zone 16, shown in blue
 Red tint indicates areas in which only landmark buildings are shown

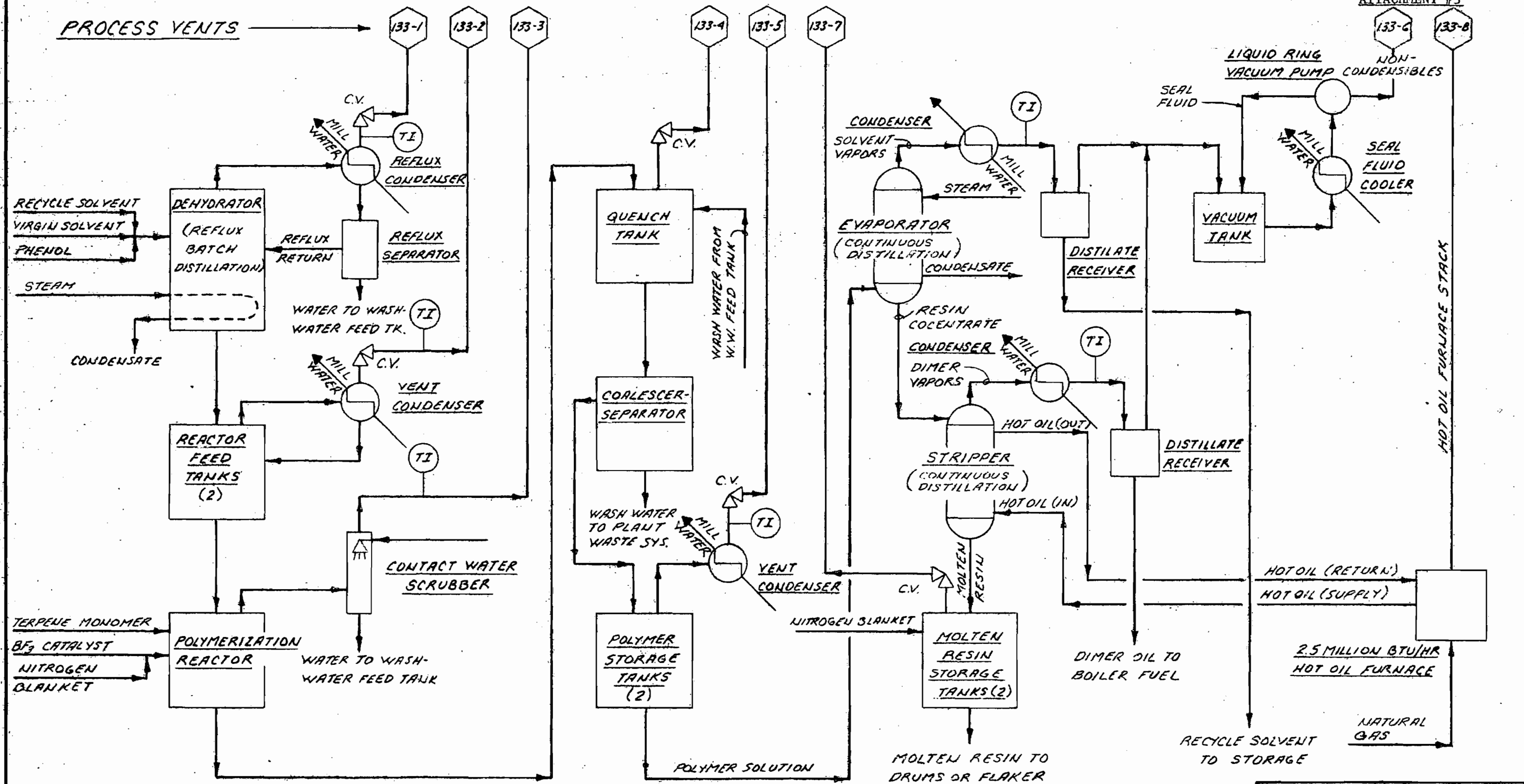


CONTOUR INT:
 DATUM IS ME:
 DEPTH CURVES AND SOUNDINGS IN
 SHELVING SHOWN REPRESENTS THE A
 THE MEAN RANGE OF TIDE

UTM GRID AND 1:100,000 SCALE
 ESTABLISHED AT CENTER OF SHEET

THIS MAP COMPLIES WITH NATION
 FOR SALE BY U.S. GEOLOGICAL S
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS

FORT BARRANCASI



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.

NOTE: CONSERVATION VENTS ARE DESIGNATED (C.V.)

REICHOLD CHEMICALS, INC.
RESINS & BINDERS DIV.
PENSACOLA, FLA.

TERPENE-PHENOL RESIN PROCESS
NEW BLDG. NO. 133
VENTS-133-1 THRU 133-8

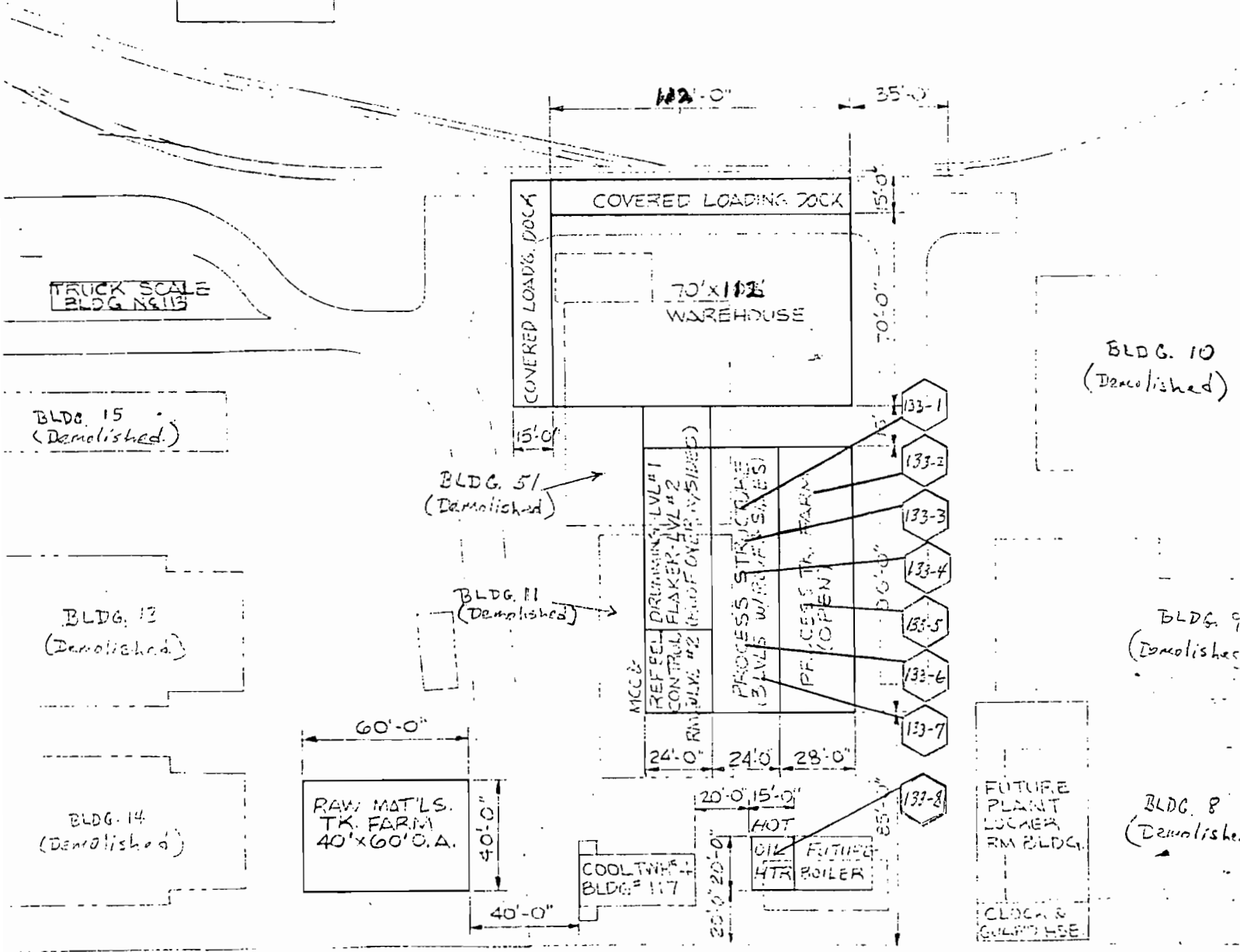
3									
2									
1									
NO.	DATE	REVISIONS	DR.	ENG.	APP.	DATE 12/27/64	SCALE NONE	SKA-1972	


DR. R. SCHOL ENG. A. E. M. APP. *[Signature]*

Best Available Copy

PERMIT APPLICATION
ATTACHMENT #4

COOL. TWR. #1A
BLDG. NO 100
COOL. TWR. #1
BLDG. # 30



						 REICHOLD CHEMICALS, INC. Resins & Binders Division Pensacola, Florida		
3						TERPENE-PHENOL RESIN PROCESS VENTS NEW BLDG. 133 PENSACOLA PLANT		
2						DR. <i>ASM</i>	ENG. <i>A.E.M</i>	APPD. <i>ASM</i>
1						DATE 12-27-84	SCALE NONE	SKA-1973
NO.	DATE	REVISIONS	DR.	ENG.	APP.	DATE	SCALE	NO.

HEAT EXCHANGER SPECIFICATION SHEET

Southern Heat Exchanger Corp.

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PLANT LOCATION PENSACOLA, FLA		DATE 9-23-84	
SERVICE OF UNIT REACTOR FEED TANK CONDENSER		ITEM NO. HEX-217	
SIZE 6x9 ¹ / ₂	TYPE SETBEM	CONNECTED IN	
SQ. FT. SURF./UNIT (GROSS) 49	SHELLS/UNIT 1	SQ. FT. SURF./SHELL (GROSS) 49	
PERFORMANCE OF ONE UNIT			
FLUID CIRCULATED	SHELL SIDE WATER	TUBE SIDE SOLVENT	
TOTAL FLUID ENTERING			
VAPOR		269 LB/HR	
LIQUID 4782	→ 2152 LB/HR		
STEAM			
NON-CONDENSABLES			
FLUID CONDENSED CONDENSED		269 LB/HR	
STEAM CONDENSED			
GRAVITY		0.84 - LIQUID	
VISCOSITY - CENTIPOISE		0.4 - LIQUID	
MOLECULAR WEIGHT		92	
SPECIFIC HEAT	BTU/LB.° F	0.6 (LIQUID) BTU/LB.° F	
THERMAL CONDUCTIVITY	BTU/HR-FT.° F	0.08 BTU/HR-FT.° F	
LATENT HEAT	BTU/LB	160 BTU/LB	
TEMPERATURE IN	° F	104 ° F	
TEMPERATURE OUT	° F	102 ° F	
OPERATING PRESSURE	PSIG	1 PSIG	
NO. PASSES PER SHELL		ONE	
VELOCITY	FT/SEC		
PRESSURE DROP	PSI	- 1/11	
FOULING RESISTANCE (MIN.)		.001	
HEAT EXCHANGED BTU/HR 43,000		MTD CORRECTED ° F 9.7	
TRANSFER RATE—SERVICE 117		CLEAN 196	
CONSTRUCTION OF ONE SHELL			
DESIGN PRESSURE	50 PSI	5 PSI	
TEST PRESSURE			
DESIGN TEMPERATURE	250 ° F	250 ° F	
TUBES 304SS 31	NO. 3/4" O.D. 16 BWG	LENGTH 8'	PITCH 15/16" Δ
SHELL CS	I.D. O.D. 6.625	SHELL COVER (INTEG) (REMOV)	
CHANNEL OR BONNET 304SS		CHANNEL COVER	
TUBESHEET—STATIONARY 304SS		TUBESHEET—FLOATING	
BAFFLES—CROSS TYPE		FLOATING HEAD COVER	
BAFFLES—LONG TYPE		IMPINGEMENT PROTECTION NOT REQ'D	
TUBE SUPPORTS			
TUBE TO TUBESHEET JOINT			
GASKETS			
CONNECTIONS SHELL SIDE 1" IN	1" OUT	RATING 150LB	
CHANNEL SIDE 3" IN	3" OUT VAPOR 1" LIQ	RATING 150LB	
CORROSION ALLOWANCE—SHELL SIDE 1/16"	TUBE SIDE NONE		
CODE REQUIREMENTS ASME		TEMA CLASS	
REMARKS CONDENSER TO BE DESIGNED AS A REFLUX TYPE CONDENSER WITH VAPOR INLET AND LIQUID OUTLET AT BOTTOM			

REICHHOLD

REACTOR FEED TANK COND.

SPEC NO HEX-217

BY GBM

ISSUE NO 1

PROJ NO 46-104

DATE 9-23-84

APPRO GBM

SHEET OF

17

HEAT EXCHANGER SPECIFICATION SHEET

Southern Heat Exchanger Corp.

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PLANT LOCATION PENSACOLA, FLA		DATE 9-23-84	
SERVICE OF UNIT POLYMER VENT CONDENSER		ITEM NO. HEX-219	
SIZE Q-96	TYPE BFM	(VERT.)	CONNECTED IN
SQ. FT. SURF./UNIT (CROSS) 65	SHELLS/UNIT 1	SQ. FT. SURF./SHELL (CROSS) 65	
PERFORMANCE OF ONE UNIT			
FLUID CIRCULATED	SHELL SIDE WATER	TUBE SIDE SOLVENT VAPOR	
TOTAL FLUID ENTERING		200 LB/HR	
VAPOR		100 LB/HR	
LIQUID	1115 LB/HR		
STEAM			
NON CONDENSABLES		100 LB/HR	
FLUID CONDENSED		100 LB/HR	
GRAVITY			
VISCOSITY - CENTIPOISE		0.4 - LIQUID	
MOLECULAR WEIGHT		92	
SPECIFIC HEAT		0.6 - LIQUID	BTU/LB.* F
THERMAL CONDUCTIVITY		0.08	BTU/HR.FT.* F
LATENT HEAT		160	BTU/LB
TEMPERATURE IN	90 * F	185	* F
TEMPERATURE OUT	110 * F	110	* F
OPERATING PRESSURE	30 PSIG	1	PSIG
NO. PASSES PER SHELL	ONE	ONE	
VELOCITY			FT/SEC
PRESSURE DROP	15 MAX NIL	NIL	PSI
FOULING RESISTANCE (MIN.)	.003	.001	
HEAT EXCHANGED-BTU/HR 22,300		MTD CORRECTED * F 71	
TRANSFER RATE-SERVICE 12		CLEAN	
CONSTRUCTION OF ONE SHELL			
DESIGN PRESSURE	50	10	PSI
TEST PRESSURE			PSI
DESIGN TEMPERATURE	250	250	* F
TUBES 316SS 31 NO. 1" O.D. 16 BWG	LENGTH 8'	PITCH 1/4" Δ	
SHELL CS	I.D. O.D. 2.625	SHELL COVER	(INTEG) (REMOV)
CHANNEL OR BONNET 316SS		CHANNEL COVER	
TUBESHEET-STATIONARY 316SS		TUBESHEET-FLOATING	
BAFFLES-CROSS TYPE		FLOATING HEAD COVER	
BAFFLES-LONG TYPE		IMPINGEMENT PROTECTION	NOT REQD
TUBE SUPPORTS			
TUBE TO TUBESHEET JOINT			
GASKETS			
CONNECTIONS-SHELL SIDE 1" IN	1" OUT	RATING 150LB	
CHANNEL SIDE 4" IN	4" OUT-VAP 1" LIQUID	RATING 150LB	
CORROSION ALLOWANCE-SHELL SIDE 1/16"	TUBE SIDE NONE		
CODE REQUIREMENTS ASME		TEMA CLASS	
REMARKS - CONDENSER TO BE DESIGNED AS A REFLUX TYPE CONDENSER WITH VAPOR INLET AND LIQUID OUTLET AT BOTTOM			

REICHHOLD

POLYMER VENT CONDENSER

SPEC NO HEX-219

BY GBM

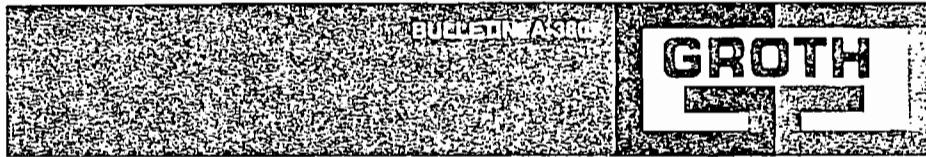
ISSUE NO 1

PROJ NO 46-106

DATE 9-23-84

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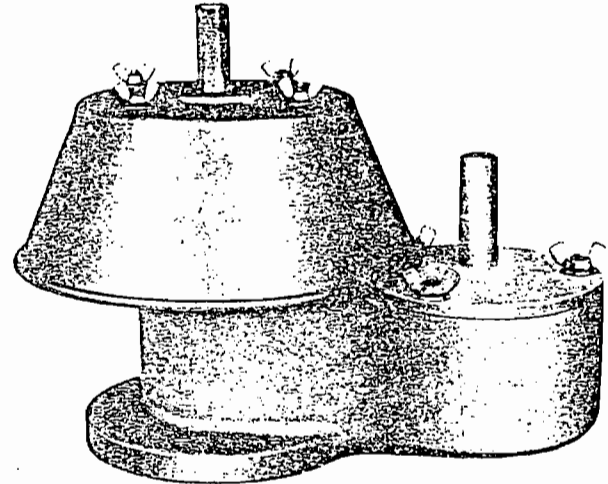


TANK PROTECTION DIVISION

CONSERVATION VENT

Model 1200

- ★ SIZES 2" THROUGH 12"
- ★ PRESSURE SETTINGS ½ OZ./in.² TO 15 PSIG
- ★ VACUUM SETTINGS ½ OZ./in.² TO 12 PSI
- ★ AVAILABLE IN ALUMINUM (TYPE 356), CARBON STEEL, STAINLESS STEEL, FIBERGLASS, AND OTHER MATERIALS
- ★ MODULAR CONSTRUCTION— COMPATIBLE WITH 1200 AND 1300 SERIES VENTS

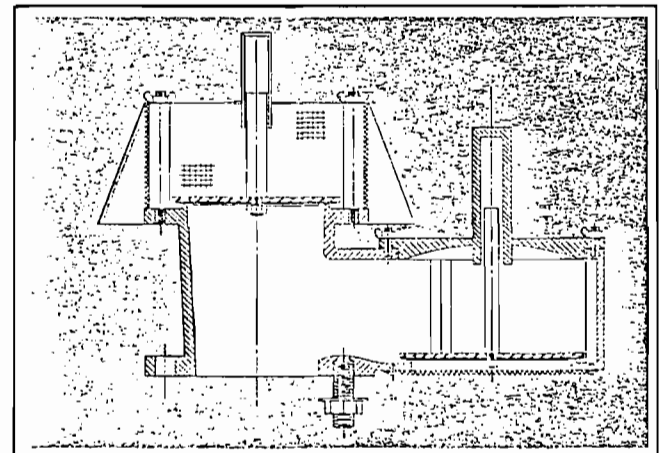


Conservation Vent

Model 1200 is designed to protect your tank from damage created by overpressuring or excessive vacuum. Costly product evaporation losses due to normal tank "breathing" are greatly reduced. Because the Model 1200 retains toxic vapors, atmospheric contamination is prevented. This helps to provide increased fire protection and safety.

SPECIAL FEATURES

Model 1200 offers Groth's special "cushioned air" seating. Superior performing Teflon seating diaphragms are standard to minimize sticking caused by resinous vapors and atmospheric moisture. The Model 1200 has a self draining housing body and drip rings to protect seating surfaces from condensate and freezing. This design also avoids dangerous pressure or vacuum buildup due to binding or clogging of the vent. Metal-to-metal, Buna-N,



Viton, and other seating diaphragms can be provided when required. To insure the proper alignment of seating surfaces, there is peripheral guiding and a center stabilizing system.

GROTH, THE CAPABILITY COMPANY

As with all Groth products, every Model 1200 is factory inspected and tested to meet your critical requirements and special needs. Inventory is maintained to insure rapid delivery.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

№ 70057

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Reichhold Chemicals, Inc. Date January 10, 1985
 Address White Plains, N.Y. Dollars \$ 500.00
 Applicant Name & Address Same as above
 Source of Revenue _____
 Revenue Code 001031 Application Number AC 17-098127
 By Patricia G. Adams

REICHHOLD CHEMICALS, INC.

VENDOR NO.	INVOICE DATE	POST MED.	PLT.	INVOICE AMOUNT	DISCOUNT	NET AMOUNT
						\$500.00
CONSTRUCTION PERMIT						

DETACH BEFORE DEPOSITING

REICHHOLD CHEMICALS, INC.

04610880

50-145
213

824-19

CHECK DATE **WHITE PLAINS, N.Y.**

01 07 85

MO. DAY YR.

PAY \$*****500.00***

DOLLARS CENTS

REICHHOLD CHEMICALS, INC.

[Signature]

TO THE DEPARTMENT OF ENVIRONMENTAL REGULATION
 ORDER 2600 BLAIRSTONE ROAD
 OF TALLAHASSEE, FL 32301

MANUFACTURERS HANOVER, N.A.
 ALBANY, N.Y.