

Check Sheet

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

Reichhold Chemicals
AC 17-184265

Cross References:

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

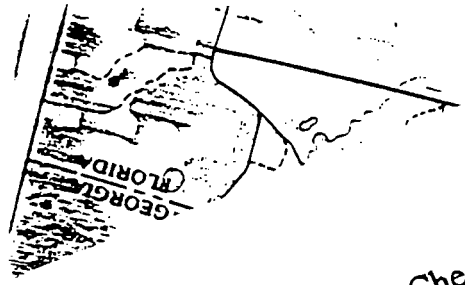
Final

Determination:

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

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



P 408 531 198

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Ellis G. Fleming	
Street and No. Reichhold Chemicals Post Office Box 1433	
P.O., State and ZIP Code Pensacola, Florida 32596	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 07-02-87 AO 17-73934, AC 17-104265 AC 17 098127	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447-845

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: Ellis G. Fleming
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 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	P 408 531 198

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

5. Signature - Addressee
X *Ellis G. Fleming*

6. Signature - Agent
X

7. Date of Delivery
7/6/87

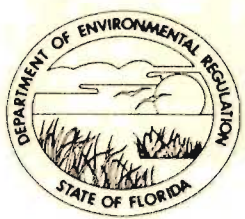
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

File
AC 17-104265

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.

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

Reichhold Chemicals, Inc.

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

PM

6-12-87

Pensacola, FL

DER

JUN 15 1987

BAQM

REICHHOLD

June 12, 1987

Mr. Clair Fancy
Bureau of Air Quality Management
2600 Blairstone 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

Robert W. Clark
Senior Environmental Engineer

RWC/gw

pc: J. Preece - DER - Pensacola

copied:

*Teresa }
Bill } 6-15-87 WMM
Clair }*

Construction

Permit Application # ~~AO 239~~ AC 17-104265

Best Available Copy

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROBERT V. KRIEDEL
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 permitted establishment.

*Attach letter of authorization

Signed: *Ellis G. Fleming*

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

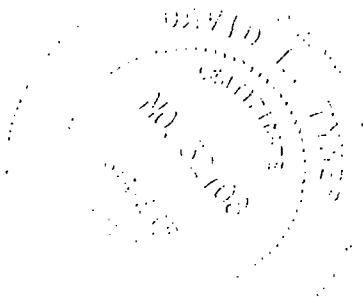
Date: 5/13/85 Telephone No. 904-433-7621

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 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.



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
REICHHOLD 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

20.5 TMS/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)

CM-RRR
P 408-531-147
Mailed: 1/28/87
See AC 17-098127 RM

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 routing slip and extends into the main body of the memorandum.

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

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

P 408 532 057
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to Mr. Robert P. Aston	
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 12/3/86	

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. 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. Robert P. Aston
 Reichhold Chemicals
 P. O. Box 1433
 Pensacola, FL 32596

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD	Article Number P 408 532 057
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Always obtain signature of addressee or agent and **DATE DELIVERED.**

- Signature - Addressee
X
- Signature - Agent
X *Mr. Jackson*
- Date of Delivery
DEC 3 1986
- 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 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:

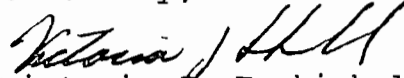
From: October 31, 1986
To: December 31, 1986

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

FOR ROUTING TO OTHER THAN THE ADDRESSEE

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

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

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

CF/pa

Attachment

436/10/116-17

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

RECEIVED
OCT 16 1986
NORTHWEST FLORIDA
DER

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

asap OCT 27 1986

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

Terese
Please act on request
to extend AC 17-098127
and AC 17-104265.

We recommend such
an extension.

NW District will
follow compliance testing

FROM:

Sal Press

DATE

Oct 24, 1986

PHONE

Reichhold Chemicals, Inc.

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

DER
MAY 9 1986
BAQM

REICHHOLD

May 7, 1986

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Re: Construction Permit Numbers AC17-098127
AC17-104265

Dear Mr. Fancy:

Construction is progressing at our Pensacola plantsite on the Terpene-Phenol Resin Facility (AC17-098127) and the associated Resin Flaking and Bag Packaging (AC17-104265). It has become apparent that completion of these projects will be slightly delayed.

August 31, 1986
→ June 30, 1986

We therefore request an extension of Construction Permit No. AC17-098127 of 120 days and an extension of Permit No. AC17-104265 of 60 days. This will extend the expiration dates of both permits to October 31, 1986.

I am currently the authorized representative of Reichhold Chemicals, Inc. as Mr. E. E. Gerths is no longer employed by Reichhold. Attached is a letter of authorization for your files.

Your attention to this matter is greatly appreciated. If you have any questions or require additional information, please call me at 904/433-7621 Ext. 316.

Sincerely,



Robert P. Aston
Plant Manager

- pc Mr. Robert V. Kriegel - DER, Pensacola w/attachment
- Mr. Thomas W. Moody - DER, Pensacola w/attachment
- Mr. Jack Preece - DER, Pensacola w/attachment
- Mr. W. G. Branson - Reichhold, Pensacola
- Mr. A. F. Vickers - Reichhold, White Plains

Reichhold Chemicals, Inc.

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

REICHHOLD

DER
MAY 9 1986
BAQM

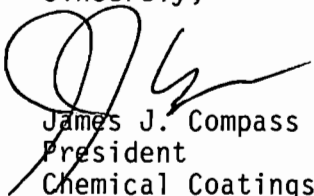
May 7, 1986

The State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

To Whom It May Concern:

Mr. Robert P. Aston, Pensacola Plant Manager, is hereby authorized to represent Reichhold Chemicals, Inc. with regard to environmental matters at the Pensacola, Florida plant.

Sincerely,



James J. Compass
President
Chemical Coatings Division

JJC/nb

5/9

~~Willard -
please handle~~

5/12

Teresa
I believe you possess
this application. If so,
please handle this.

Wrd

P 085 152 655

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

Sent to Mr. Ellis G. Fleming	
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 9/18/85	

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. <input type="checkbox"/> Show to whom, date and address of delivery.	
2. <input type="checkbox"/> Restricted Delivery.	
3. Article Addressed to: Mr. Ellis G. Fleming 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 085 152 655
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee <i>X Shelia Martin</i>	
6. Signature - Agent <i>X</i>	
7. Date of Delivery <i>9-20-85</i>	
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. Ellis G. Fleming
Director of Manufacturing
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

September 17, 1985

Enclosed is Permit Number AC 17-104265 to Reichhold Chemicals, Inc., which authorizes the construction of a resin flaking and bag packaging facility at the Reichhold Chemicals Complex in Escambia County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 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,

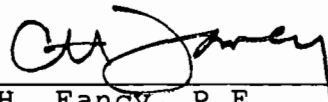
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Enclosure

cc: David L. Tyner, Reichhold Chemicals, Inc.
Tom Moody, DER Northwest District

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on September 18, 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 B. Adams September 18, 1985
Clerk Date

Final Determination

Reichhold Chemicals Complex
Pensacola, Florida
Escambia County

Resin Flaking and Bag Packaging Facility
Permit Number
AC 17-104265

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

September 11, 1985

Final Determination

Reichhold's application for a permit to construct a resin flaking and bag packaging facility at the Reichhold Chemicals 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 News Journal on July 31, 1985.

Copies of the preliminary determination have been available for public inspection at the Department's Northeast District office and the Bureau of Air Quality Management 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: AC17-104265
Expiration Date: August 31, 1986
County: Escambia
Latitude/Longitude: 30° 24' 30" N/
87° 14' 45" W
Project: Resin Flaking and Bag
Packaging

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 Resin Flaking and Bag Packaging Facility to be located at the Reichhold Chemical Complex, building #133, in Pensacola, Escambia County, Florida. The UTM coordinates of this site are 476.4 km East and 3363.9 km North.

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16).

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-104265
Expiration Date: August 31, 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: AC17-104265
Expiration Date: August 31, 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: AC17-104265
Expiration Date: August 31, 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: AC17-104265
Expiration Date: August 31, 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:

Resin Flaking and Bag Packaging Facility

- 1. This permit replaces current operating permits Nos. A017-73937 and A017-73934. The applicant shall return these operating permits 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. Particulate matter (PM) emissions from the facility shall not exceed 0.825 lb/hr and 3.6 tons per year (vent No. 133-10). No emissions are expected from vent 133-9.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-104265
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

4. Visible emissions (VE) 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. If VE exceed 5% opacity, Method 5, Determination of Particulate Emissions from Stationary Sources shall be requested by the Department. The district office shall be notified 15 days prior to test.

5. 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.

6. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the facility. Visible emissions test shall be performed on an annual basis.

7. Construction shall reasonably conform to the plans submitted in the application.

8. The applicant shall report any delay in construction and completion of this project to the Department's district office.

9. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying road and construction sites will be taken by the applicant.

Issued this 12 day of September,
1985.

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

REICHHOLD

August 7, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. H. Fancy
Bureau of Air Quality Management
2600 Blirstone 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 resin flaking and bag packaging facility at Pensacola.

Please advise if there are any questions.

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

DER
AUG 09 1985
BAQM

PENSACOLA News Journal

PUBLISHED DAILY
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 News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

DER Notice

_____ in the _____ Court,

was published in said newspaper in the issues of _____

July 31, 1985

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

J. Diane Deal

Sworn to and subscribed before me this 31st day of July, A.D., 1985

[Signature]
NOTARY PUBLIC.

My Commission Expires Oct. 16, 1987.

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. to construct a resin flaking and bag packaging facility at their plant located at 407, South Pace Boulevard, 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 shall constitute a waiver 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 object to the proposed agency action 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

DER

AUG 09 1985

BAQM

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.

Legal No. 30124 1-T July 31, 1985

P 408 530 369

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Ellis G. Fleming	
Street and No.	
FPO., 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 7/24/85	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

<p>● SENDER: Complete items 1, 2, 3 and 4.</p> <p>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.</p>	
<p>1. <input type="checkbox"/> Show to whom, date and address of delivery.</p> <p>2. <input type="checkbox"/> Restricted Delivery.</p>	
<p>3. Article Addressed to: Mr. Ellis G. Fleming Reichhold Chemicals, Inc. P. O. Box 1433 Pensacola, FL 32596</p>	
<p>4. Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p>	<p>Article Number P 408 530 369</p>
<p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	
<p>5. Signature - Addressee X <i>Melba Powell</i></p>	
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery 7-24-85</p>	
<p>8. Addressee's Address (ONLY if requested and fee paid)</p>	

DOMESTIC RETURN RECEIPT

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

RECEIVED	
<small>FOR ROUTING TO OTHER THAN THE ADDRESSEE</small>	
To: _____	Locn: _____
To: _____	Locn: _____
To: _____	Locn: _____
From: _____	Date: _____

TO: Victoria J. Tschinkel

FROM: Clair Fancy *CF*

DATE: September 11, 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 resin flaking and bag packaging facility to be located at the Reichhold Chemical Complex in Pensacola, Escambia County, Florida.

Day 90, after which the permit would be issued by default, is September 13, 1985.

The Bureau recommends your approval and signature.

CF/pa

Attachment

Office of the Secretary **BAQM**

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

July 22, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Fleming:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a resin flaking and bag packaging facility at your plant 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: David L. Tyner, P.E., Reichhold Chemicals, Inc.
Tom Moody, DER Northwest District

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. to construct a resin flaking and bag packaging facility at their plant located at 407 South Pace Boulevard, 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.

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 17-104265
407 South Pace Boulevard)
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 May 17, 1985, to the Department of Environmental Regulation for a permit to construct a resin flaking and bag packaging facility at their existing plant 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 27 day of July, 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:

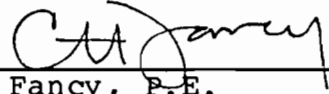
Ellis G. Fleming
Director of Manufacturing
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

David L. Tyner, P.E.
Senior Project Engineer
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

Tom 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 24 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 acknow-
ledged.

Patricia B. Adams July 24, 1985
Clerk Date

Technical Evaluation
and
Preliminary Determination

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

Resin Flaking and Bag Packaging

Permit Number:
AC17-104265

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

July 12, 1985

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: May 17, 1985.

Application's completeness date: May 17, 1985

Date of Distribution of Proposed Agency Action and Preliminary Determination: July 15, 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' 30" North and 87° 14' 45" 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

Source Classification Code (SCC) 3-01-018-99

II.3. FACILITY CATEGORY

Reichhold Chemicals, Inc. is classified as a major emitting facility for particulate matter (PM) and volatile organic compounds (VOC). The proposed project, a consolidation and expansion of existing resin flaking and bag packaging operations, will increase the overall PM emissions at Reichhold Chemical's complex by 2.1 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 proposes project involves constructing and operating a new resin flaking and bag packaging facility. This new higher capacity facility will replace two existing ones.

III.1 BACKGROUND INFORMATION

An air pollution source inventory was included with the application. This inventory shows 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). These permitted emissions would vary if any of the sources are replaced and the allowable emissions changed. At the present time, plans are to replace the resin flaking and bag packaging, facility (a PM source permit No. 17-104265) and the terpene phenol resin facility (a VOC source, permit No. AC 17-098127). The terpene phenol resin facility permit was issued on July 2, 1985.

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:

Terpene resin is accumulated in heated storage tanks. The molten resin flows onto a water cooled stainless steel belt conveyor where it forms a thin sheet and solidifies. Ambient air is passed over the semi-solid resin to assist in cooling. The heated air above the conveyor will be exhausted from the process building via a hood and blower. There is no air pollution control device on this exhaust vent (vent No. 133-9). As the cooled resin is discharged from the end of the flaker belt, the resin breaks up into small pieces and is conveyed by an enclosed belt conveyor to a bagging hopper. The resin is packaged in 50 lb bags with a standard bag packaging machine.

Controls:

During the process of flaking, conveying, and packaging, a small amount of resin dust is generated due to the friability of the product. This dust is captured from the various points of generation by a duct system and collected in a baghouse dust collector (vent No. 133-10). The resin dust collected is returned to the process via a rework solution tank.

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 resin flaking and bag packaging 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 and volatile organic compounds, 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, General Particulate Emission Limiting Standards.

VI. SOURCE IMPACT ANALYSIS

VI.1. EMISSION SUMMARY

The operation of the resin flaking and bagging system will produce emissions of particulate matter (PM) to the atmosphere.

The following table shows the net emission increase and the permitted emissions for the new facility.

FACILITY	POLLUTANT (PM)	
<u>Existing</u>		
Resin Crushing & Bag Packaging	0.335 lb/hr	1.5 ton/yr
Resin Flaking		
<u>New</u>		
Resin Flaking & Bag Packaging	0.825 lb/hr	3.6 ton/yr
Net Emission Increase		2.1 ton/yr
PSD Significance level		25 ton/yr

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 listed in attached draft permit, are met. The impact of construction and operating a resin flaking and bag packaging facility at the Pensacola plant will not cause or contribute to a violation of any ambient air quality standard.

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: AC17-104265
Expiration Date: August 31, 1986
County: Escambia
Latitude/Longitude: 30° 24' 30" N/
87° 14' 45" W
Project: Resin Flaking and Bag
Packaging

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 Resin Flaking and Bag Packaging Facility to be located at the Reichhold Chemical Complex, building #133, in Pensacola, Escambia County, Florida. The UTM coordinates of this site are 476.4 km East and 3363.9 km North.

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16).

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-104265
Expiration Date: August 31, 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: AC17-104265
Expiration Date: August 31, 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: AC17-104265
Expiration Date: August 31, 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: AC17-104265
Expiration Date: August 31, 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:

Resin Flaking and Bag Packaging Facility

1. This permit replaces current operating permits Nos. A017-73937 and A017-73934. The applicant shall return these operating permits 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. Particulate matter (PM) emissions from the facility shall not exceed 0.825 lb/hr and 3.6 tons per year (vent No. 133-10). No emissions are expected from vent 133-9.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC17-104265
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

4. Visible emissions (VE) 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. If VE exceed 5% opacity, Method 5, Determination of Particulate Emissions from Stationary Sources shall be requested by the Department. The district office shall be notified 15 days prior to test.
5. 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.
6. Upon obtaining an operating permit, the applicant will be required to submit annual reports on the actual operation and emissions of the facility. Visible emissions test shall be performed on an annual basis.
7. Construction shall reasonably conform to the plans submitted in the application.
8. The applicant shall report any delay in construction and completion of this project to the Department's district office.
9. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying road and construction sites will be taken by the applicant.

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

REICHHOLD

May 13, 1985

BAQM
MAY 17 1985
DER

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 Nirez 2000 resin flaking and bag packaging 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 numbers A017-73937 and A017-73934 and these old facilities will be shut down and dismantled when the new unit starts up. Emissions consist entirely of particulate matter (resin dust). As a result of the new installation, emissions from this process will be reduced when compared on a product weight basis. The new installation does not require new source review or PSD review as the net emission increase is less than 25 tons per year. A check is enclosed in the amount of \$250 covering the permit application fee. Please return the fee acknowledgement at your convenience.

Also attached at the back of this application is supplementary information relative to the APIS program. This information, although not specifically required, has been requested in the past by your permit evaluators.

If you have any questions or need additional information regarding this application, please contact me at (904)478-2060.

Very truly yours,



Robert W. Clarke
Senior Project Engineer - Environmental

RWC:jh
Attachments

cc: Mr. E. G. Fleming - Reichhold, Pensacola
Mr. A. R. Kulka - Reichhold, Pensacola
Mr. Robert V. Kriegel - DER, Pensacola
Mr. Thomas W. Moody - DER, Pensacola
Mr. G. B. Mitrovich - Reichhold, Pensacola
Mr. A. E. Moore - Reichhold, Pensacola
Mr. R. C. Sulick - Reichhold, Pensacola
Mr. D. E. Wentworth - Reichhold, Pensacola

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

Reichhold Chemicals, Inc.

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

REICHHOLD

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

AC 17-104265

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501



DER

MAY 17 1985

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROBERT V. KRIEGL
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

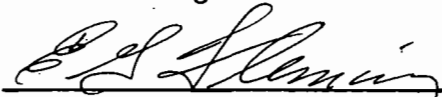
SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

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 permitted establishment.

*Attach letter of authorization

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

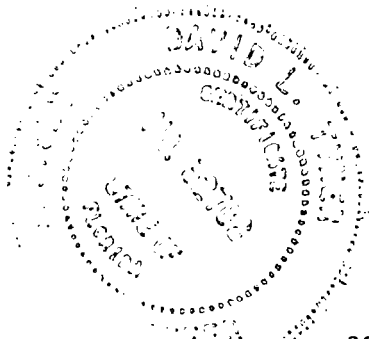
Date: 5/13/85 Telephone No. 904-433-7621

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 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.



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

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: _____

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? No
If yes, see Section VI.
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 justification for any answer of "No" that might be considered questionable.

SEE ATTACHED CALCULATION OF "NET EMISSION INCREASE" RELATED TO ITEM F.3. AT THE BACK OF THIS APPLICATION.

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

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

SEE ATTACHED PROCESS DESCRIPTION

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Molten Resin	Resin Dust	1.0	8250	SKA-1976

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

1. Total Process Input Rate (lbs/hr): 8250
2. Product Weight (lbs/hr): 8167.5

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

VENT NO. 133-10

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	
Resin Dust	0.825	3.6	610 (1)	8.64	180,180	90	SKA-1976
			$E = 3.59P^{.62}$		(See attached detail		
					in Section V)		

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).

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		

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

1. Total Process Input Rate (lbs/hr): _____
2. Product Weight (lbs/hr): _____

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

VENT NO. 133-9

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	
Warm Air	-	-	-	-	-	-	SKA-1976

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)
MIKRO PUL CO	Resin Dust	99%	Not Applicable	Manufacturers
MIKRO-PULSAIRE				Testing with
Bag Filter				Safety Factor
Model 16S-6-30				of 100

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. N/A

Annual Average _____ Maximum _____

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

All solid resin dust residues are recovered and reprocessed to molten resin.

VENT NO. 133-10

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

Stack Height: 16 ft. Stack Diameter: 2/3 ft.
 Gas Flow Rate: 1000 ACFM 780 DSCFM Gas Exit Temperature: 100 °F.
 Water Vapor Content: 3.5 % Velocity: 43 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) _____

VENT NO. 133-9

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

Stack Height: 16 ft. Stack Diameter: 1/2 ft.
 Gas Flow Rate: 500 ACFM 378 DSCFM Gas Exit Temperature: 120 °F.
 Water Vapor Content: 3.5 % Velocity: 38 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: n/a

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

n/a

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

SEE ATTACHED DOCUMENTATION AT THE BACK OF THIS APPLICATION

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? N/A

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____
_____	_____

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

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

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

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

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

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).

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 V: SUPPLEMENTAL REQUIREMENTS

Item 2. "Basis of Emission Estimates"

Emission estimates are based upon the selected manufacturers' test and product literature claims. The equipment selected is a state of the art bag collection filter particulate removal system manufactured by Mikropul - MIKRO-PULSAIRE Model 16S-6-30 (see attached product literature under Item No.4). Mikropul claims 99.99% efficiency on this type of service which is well within the technology of bag filtration. Reichhold has found, however, that long term actual efficiencies are somewhat lower due to bag failures, small bypass leaks, etc. Reichhold has, therefore, factored the expected emissions by 100 (i.e. 99% efficiency). Experience dictates that the actual efficiency lies somewhere in between.

After construction, the bag filter efficiency will be tested by an approved stack sampling contractor in accordance with 40 CFR 60 APPENDIX A; Method 5 "Determination of Particulate Emissions from Stationary Sources."

Item 3. "Basis of Potential Emissions Determination" (with and without control device)

Total resin dust produced by the flaking and bag packaging operations amounts to 1% of the product input. This is based on long term operation mass balances (see SKA-1976) in similar operations at the Pensacola plant.

If the process were operated without any control device, i.e., no dust exhaust and collection system, the resin fines and dust would accumulate in the operating area and create intolerable housekeeping and personnel operating conditions.

If the process were operated with only an exhaust system and no control on the discharge, it is estimated that 75% - 80% of the fines and dust would accumulate in the general area around the operating building with the balance of the dust being dispersed into the atmosphere. Therefore, the potential maximum emissions without control from this source are estimated at approximately 21 lbs per hr or 90 tons per year.

Note: For the purposes of calculating the application fee under Rule 17.4.05(4)(a), Definition (127) of 17-2.100 was utilized to calculate "Potential Emissions"

(See calculation details attached as Section II: Item F.3.).

Maximum Allowance Emission with the control device as part of the design =
8.64 LBS per Hour = 37.75 Tons Per Year.

Item 4. "Design Details of Air Control Equipment"

The selected particulate control equipment for this project is a MIKROPUL Company Mikro-Pulsaire bag filter (see attached manufacturer's literature describing the general feature of the Mikro-Pulsaire filter).

The model selected is the 16S-6-30 which will provide 113 sq ft of filtration area or 8.85 CFM per square foot.

Particulate will be collected by circulating air under collection hoods at slightly negative pressure provided by a centrifugal blower downstream of the bag filter.

Item 5. "Derivation of Control Device Efficiency"

The selected control device for this service is the MikroPul Company Mikro-Pulsaire bag particulate filter.

The manufacturer states an efficiency for his device as 99.99% (see literature in Item 4).

To be conservative this efficiency was factored by 100 to obtain the stated actual estimated emissions efficiency of 99%.

Plant operating experience on similar service using similar bag filtering equipment indicates that the actual emissions will be somewhere between 99.99% and 99% efficiently removed.

Item 6. "8½ x 11 Process Flow Diagram"

See attached Process Flow Sketch SKA-1976

Item 7: "8½ x 11 Plant Location Plot Plan "

See attached Section from USGS Pensacola Quadrangle

Item 8. "8½ x 11 Process Location Plant Plan"

See attached Resin and Bag Packaging Plot Plan SKA-2109

Item 9. "Application Fee"

A check for \$250 made out to the State of Florida, Department of Environmental Regulation" is attached with this permit to construct application along with an "Acknowledgement of Receipt of Payment" form requested to be returned to Reichhold Chemicals, Inc. See detail under Item 3 for calculated "Potential to Emit" relative to Rule 17.4.05(4)(a).

Item 10. Not Applicable

the mikro-pulsaire* dust collector

what it is The MIKRO-PULSAIRE is a complete, simplified, versatile dry filter collector combining high dust collection efficiency and very low maintenance. It is fully automatic, self-cleaning, with NO INTERNAL MOVING PARTS. All controls are on the outside of the unit. It has a high air capacity that makes it possible to do a specific job in less floor space than other units designed for similar operations.

how it operates The MIKRO-PULSAIRE consists primarily of a series of cylindrical filter elements enclosed in a dust-tight housing. Dust-laden air is admitted to the housing and clean air withdrawn from inside the filter cylinders. As dust laden particles accumulate on the filter elements, periodic cleaning is accomplished by introduction of a momentary jet of high-pressure air through a specially designed venturi mounted above each filter cylinder. This primary high-pressure jet pumps secondary air via the jet pump method, thus producing a reverse flow sufficient to clean the filter cylinders. Since only a fraction of the total filter area is cleaned at one time, continuous flow through the collector is maintained. The jets are controlled by diaphragm valves, activated by solenoid pilot valves and a timer.

features at a glance:

economy operation — no internal moving parts. Elimination of chains, blow rings, mechanical shakers and compartmenting valves means drastically reduced maintenance, longer bag life, uninterrupted processing.

economy installation — all units pre-wired! MIKRO-PULSAIRE is virtually ready for operation as delivered — with no hidden extras or additional costs.

economy performance — 99.99% plus recovery! Proved in more than 20,000 installations throughout the world . . . performing outstandingly in the chemical, food, drug, metal-working, milling, animal feeds and rock products fields. Applicable to any industry that has a dry dust problem.

handles dust streams to 425° Fahrenheit! High temperature filter elements of DuPont "Nomex"® permit operation above most acid dew points. DuPont Teflon™ also available when extra resistance to chemicals is required.

look for the venturi... the big difference in performance!

Standard equipment on all MIKRO-PULSAIRE Collectors . . . a basic requirement for maximum efficiency of the filter media of any unit that employs the jet-cleaning principle!

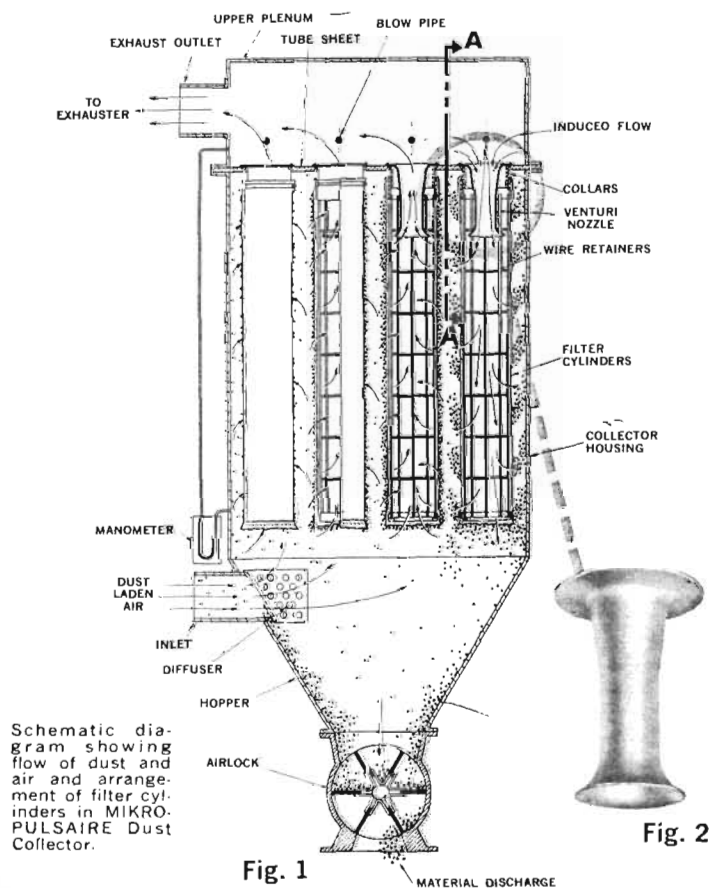
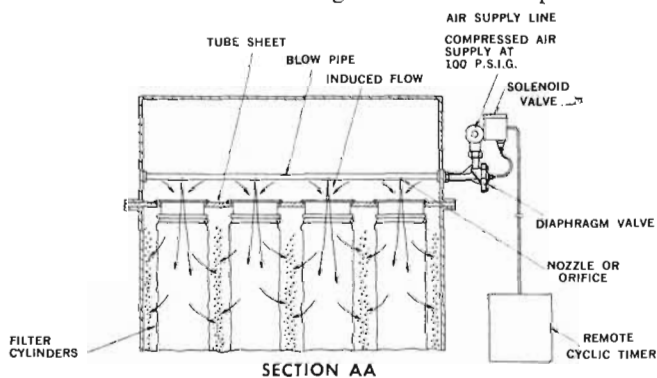


Fig. 1

Fig. 2

the "square welded" mikro-pulsaire

for the collection and control of a wide variety of industrial dusts

This factory assembled unit, which includes a permeable diffuser as a standard part, is available in a size range from 16 to 100 filter bags, and in bag lengths of 6 and 8 feet. Offering maximum space-saving efficiency, it can pack up to 930 sq. ft. of filter cloth within a six foot square housing. Today, this modern, high-performance collector is venting particle reduction machinery of every

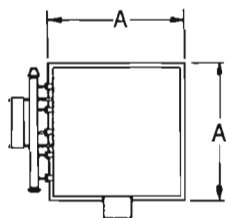


Fig. 7

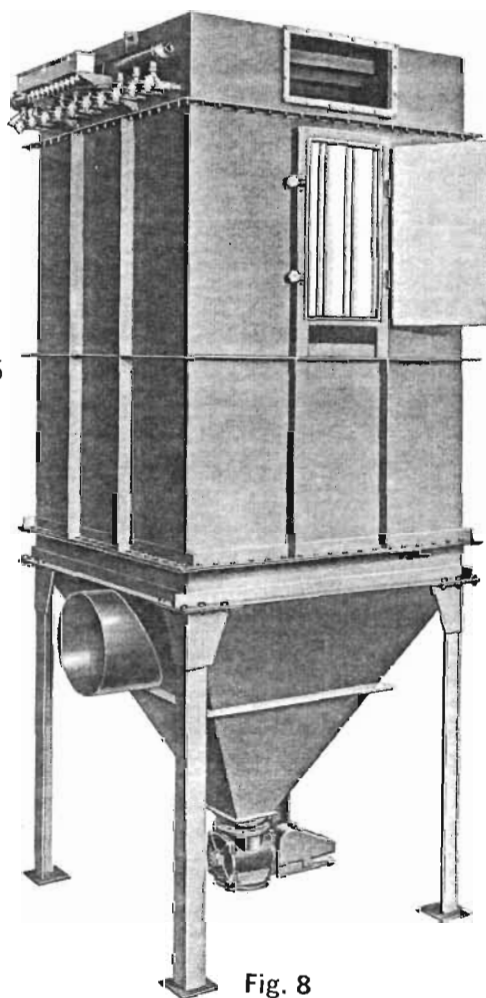


Fig. 8

type, spray dryers, separators, calciners, mixers, packaging machinery, mechanical conveyors, carloading operations and many other dust generating sources in the broad field of industrial processing.

Like all Mikro-Pulsaire collectors, this welded unit will handle high dust loadings of more than 1000 grains per cubic foot, and usually eliminates the need for primary filtration equipment.

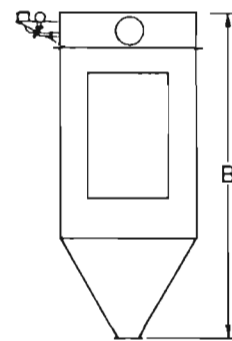


Fig. 9

specifications

MODEL	16S-6-30	16S-8-30	25S-6-30	25S-8-30	36S-6-30	36S-8-30	48S-6-20	48S-8-20	64S-6-20	64S-8-20	80S-6-20	80S-8-20	100S-6-20	100S-8-20	130S-6-20	130S-8-20
No. of Filter Tubes	16	16	25	25	36	36	48	48	64	64	80	80	100	100	130	130
Length of Filter Tubes*	6'	8'	6'	8'	6'	8'	6'	8'	6'	8'	6'	8'	6'	8'	6'	8'
Unit Ratings in. WG	30	30	30	30	30	30	20	20	20	20	20	20	20	20	20	20
Filter Area Ft. ² **	113	151	177	236	254	339	339	452	452	603	566	754	707	942	919	1215
Compressed Air Req'd.	Avg. 2.7	2.7	3.4	3.4	3.8	3.8	4.5	4.5	5.3	5.3	6.0	6.0	7.0	7.0	9.4	9.4
SCFM @ 100 P.S.I.	Max. 5.4	5.4	6.7	6.7	7.5	7.5	9.0	9.0	10.6	10.6	12.0	12.0	14.0	14.0	18.8	18.8
Approx. Weight Lbs.	750	900	1000	1200	1300	1600	1900	2250	1900	2200	2300	2700	2650	3100	3100	4100
Dimension "A"	30"	30"	36"	36"	48"	48"	60"	60"	60"	60"	72"	72"	72"	72"	72" x 96"	72" x 96"
Dimension "B"	110"	134"	115"	139"	126"	150"	142"	166"	142"	166"	152"	176"	152"	176"	173"	197"

NOTE: For capacities in excess of those specified in table above, there are Modular Units designed to accommodate any known filtering requirement.

*Diameter of filter elements is 4 1/2 inches.

**Normally from 7-15 CFM/sq. ft. As in all dust collectors, specific capacities are determined by chemical and physical characteristics of solids and gases handled.

SECTION V

ITEM 6: "PROCESS DESCRIPTION"

RESIN FLAKING & BAGGING SYSTEM

Terpene resin is to be manufactured in Building #133 and will be accumulated in heated storage tanks. The molten resin flows onto a water cooled stainless steel belt conveyor where it forms a thin sheet and solidifies. Ambient air is passed over the semi-solid resin to assist in cooling. This heated air will be exhausted from the process building via a hood and blower. There is no control device on this exhaust (vent no. 133-9). As the cooled resin is discharged from the end of the flaker belt, the resin breaks up into small pieces and is conveyed by an enclosed belt conveyor to a bagging hopper. The resin is packaged in 50 lb bags with a standard bag packaging machine.

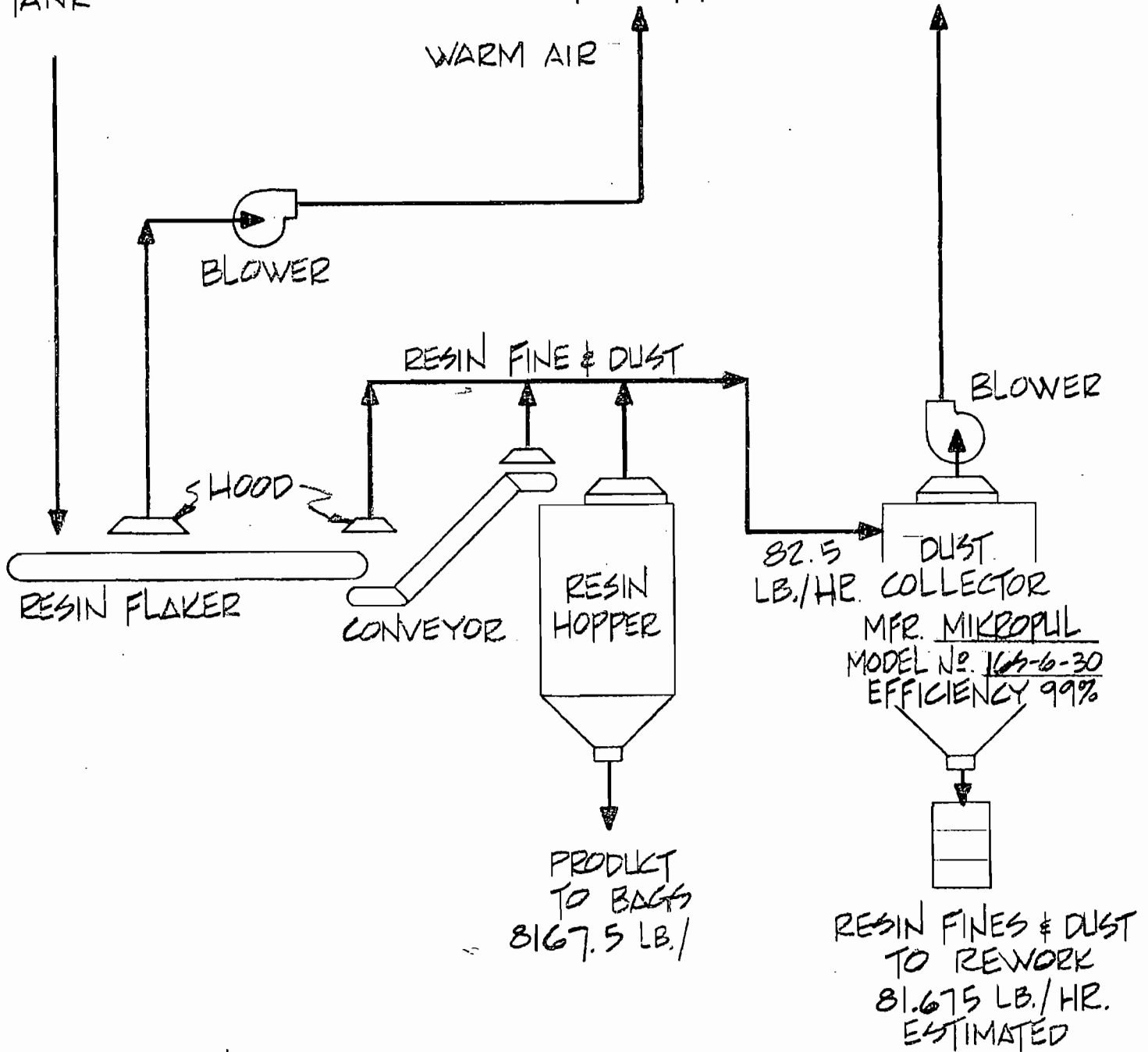
During the process of flaking, conveying, and packaging, a small amount of resin dust is generated due to the friability of the product. This dust is collected from the various points of generation by a duct system and collected in a baghouse dust collector (vent no. 133-10). The resin dust collected is returned to the process via a rework solution tank.

Attached is a flow diagram of the process showing the material balance and proposed emission rates (SKA-1976).

INPUT AT CAPACITY
66,000 LB./DAY (8250 LB. HR.)
MOLTEN RESIN
FROM FLAKER
TANK

VENT 133-10
DUST EMISSIONS
825 LB./HR.
ESTIMATED

VENT 133-9
(NO CONTROL)

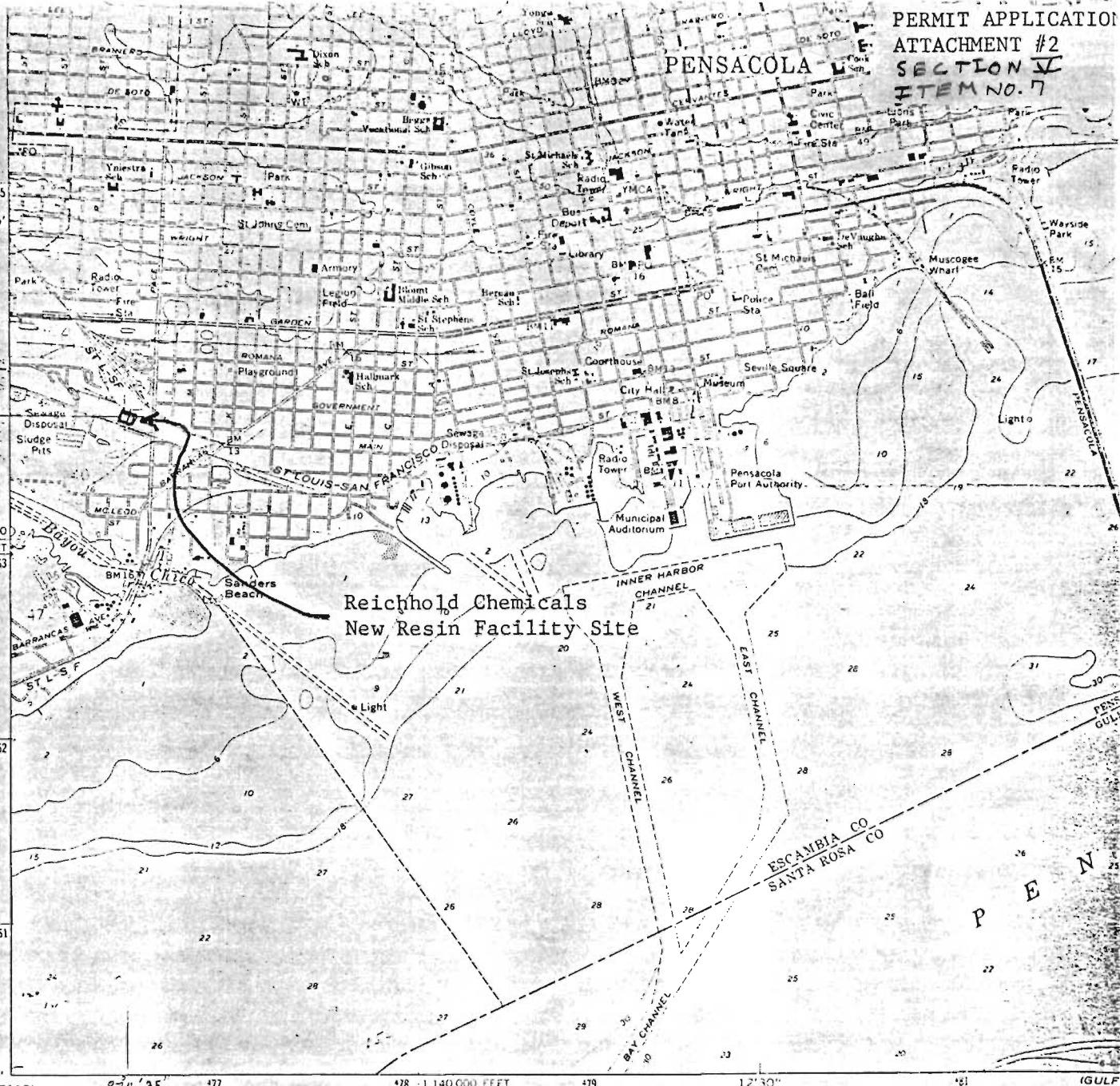


APPLICATION TO CONSTRUCT
SECTION V: ITEM NO. 6
PROCESS FLOW SKETCH



REICHOLD CHEMICALS, INC.
Resins & Binders Division
Pensacola, Florida

3						RESIN FLAKING SYSTEM BLDG. 133 - VENTS 133-9, 133-10		
2						DR. JMB	ENG. AEM	APPD. RJC
1						DATE 3-27-85	SCALE NONE	SKA-1976
NO.	DATE	REVISIONS	DR.	ENG.	APP.	DATE	SCALE	NO.



Reichhold Chemicals
New Resin Facility Site

W 5-45'02"
N 3-52'42"

3024'28"

520 000
FEET
3363

30° 22' 30"

87° 15' 87° 4' 35" 477 478 1 140 000 FEET 479 12° 30" 81

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

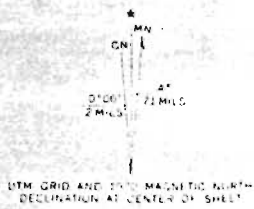
Selected hydrographic data compiled from USC&GS Charts 490 and 1265 (1969)

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

FORT BARRACAS
35° 4' 35"



CONTOUR IN DATUM IS M
DEPTH CURVES AND SOUNDINGS IN
THIS MAP REPRESENT THE
MEAN RANGE OF TIDE

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

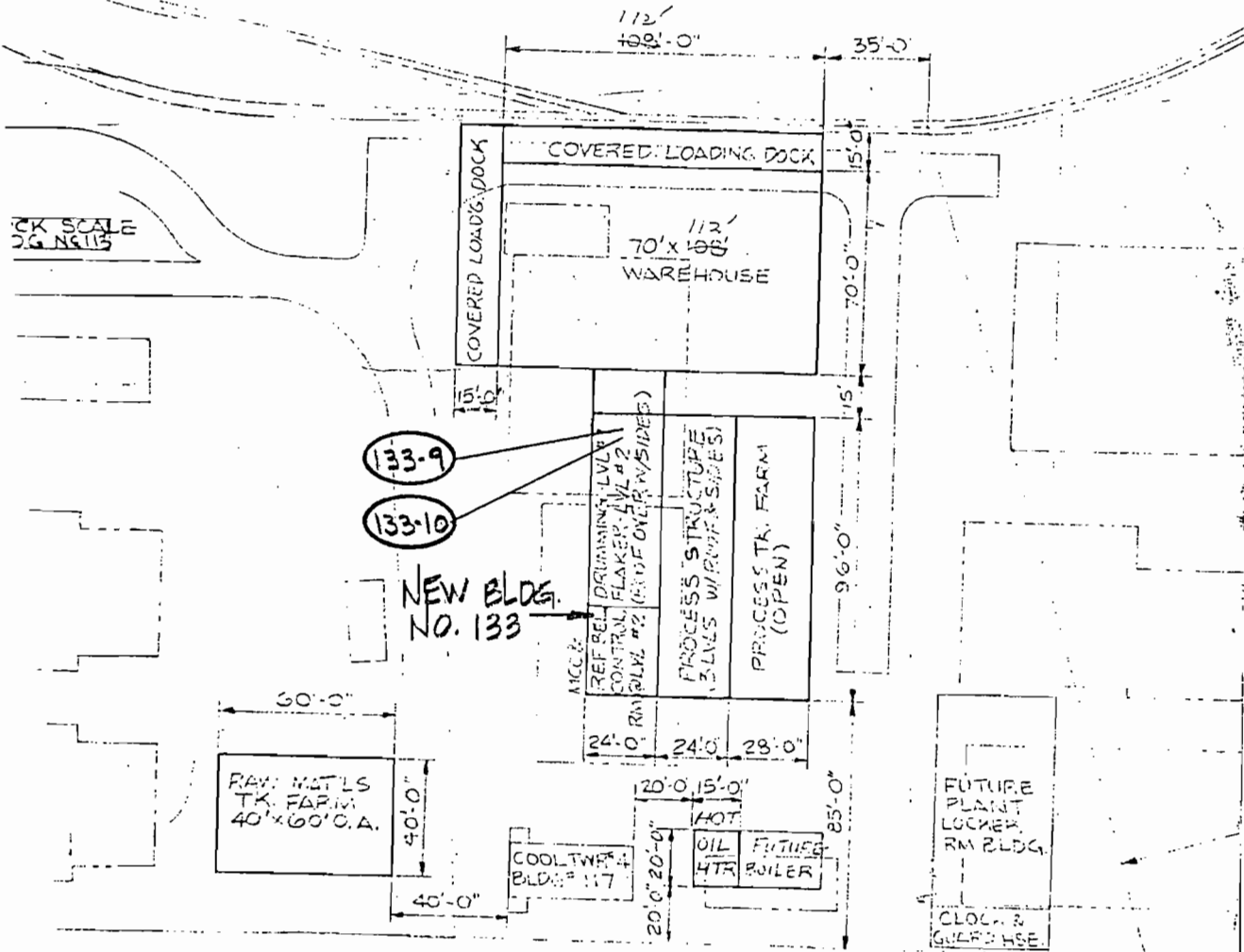
SECTION V
ITEM 7

USGS PENSACOLA QUADRANGLE

BLDG.
NO. 100
COOL. TWR. #1

BLDG.
60

APPLICATION TO CONSTRUCT
SECTION V: ITEM 8



REICHOLD CHEMICALS, INC.
Resins & Binders Division
Pensacola, Florida

3						PLOT PLAN - BLDG. NO. 133 RESIN FLAKIN & BAG PACKING		
2						DR. JMB	ENG. RWC	APPD RWC
1						DATE 5-13-85	SCALE	SKA-2109
NO.	DATE	REVISIONS	DR.	ENG.	APP.	DATE	SCALE	

APPENDIX A

SUPPLEMENTARY INFORMATION

"AIR POLLUTION INVENTORY SYSTEM INFORMATION"

1. Other Industrial Processes at the Pensacola Plant.
2. Air Emission Inventory of Criteria and Non-Criteria Pollutants Emitted from the Pensacola Facility and Related Permit Numbers
3. Total Current Emissions from the Pensacola Facility

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. Fractionational 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

The processes, permits, and air emissions for sources at the Pensacola plant are listed in the following table.

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.

ITEM 2
AIR EMISSION INVENTORY

<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	.044	.048
		NOx	.375	.406
		HC	.100	.108
		S02	.001	.0011
A017-93689	Dowtherm Heater #2 3 Million BTU/Hr Max Input Natural Gas Only	Particulates	.037	.040
		NOx	.312	.338
		HC	.083	.09
		S02	.001	.0011
A017-93690	Reactor #7 Furnace 6 Million BTU/Hr Natural Gas Only	Particulates	.055	.220
		NOx	.363	.45
		HC	.122	.408
		S02	.002	.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

ITEM 2
(CONTINUED)

<u>Permit No.</u>	<u>Process</u>	<u>Pollutant</u>	<u>Emissions</u>			
			<u>Actual</u>	<u>Potential</u>		
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 - 1.4mm 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>	- VM&P Aliphatic HC	Mineral Spirits Aliphatic HC		Vinyl Toluene Aromatic HC	
	<u>Vapor Pressure</u>	- 15mm Hg @ 100°F	1.4mm Hg @ 20°F		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 mmHg @ 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				

ITEM 2
(CONTINUED)

<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.

ITEM 3

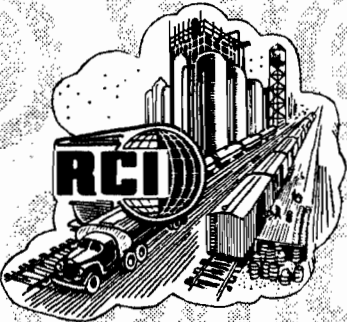
Current Total Emissions for Pensacola Facility

	<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

VENDOR NO.	INVOICE DATE	POST MED.	PLT.	INVOICE AMOUNT	DISCOUNT	NET AMOUNT
					BAQM MAY 17 1985 DER	\$250.00

DETACH BEFORE DEPOSITING

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REICHHOLD CHEMICALS, INC.

WHITE PLAINS, N.Y.

04615744

50-145
213

824-19

DOLLARS	CENTS
PAY \$*****250.00***	

REICHHOLD CHEMICALS, INC.

D. E. Hartworth

TO THE ORDER OF DEPARTMENT OF ENVIRONMENTAL REGULATION
160 GOVERNMENTAL CENTER
PENSACOLA, FL 32501

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

CHECK DATE: 05 16 85
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THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

R2 76074

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Reichhold Chemicals, Inc. Date May 17, 1985

Address White Plains, New York Dollars \$ 250.00

Applicant Name & Address Reichhold Chemicals, Inc. P.O. Box 1433 Pensacola, FL 32514

Source of Revenue _____

Revenue Code 001031 Application Number AC 17-104265

by Patricia G. Adams