

Check Sheet

Company Name: \_\_\_\_\_  
Permit Number: \_\_\_\_\_  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

*Reichold Chemicals, Inc.*  
*AC 17-119127*

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



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.

1.  Show to whom, date and address of delivery.

2.  Restricted Delivery.

3. Article Addressed to:  
 Mr. Robert P. Aston  
 Reichhold Chemicals, Inc.  
 P. O. Box 1433  
 Pensacola, FL 32596

|   |                |
|---|----------------|
| 4. Type of Service:   | Article Number |
| <input type="checkbox"/> Registered <input type="checkbox"/> Insured<br><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD<br><input type="checkbox"/> Express Mail | P 408 532 039  |

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

5. Signature - Addressee  
X

6. Signature - Agent  
X *Laren L. Short*

7. Date of Delivery  
**AUG 26 1986**

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

DOMESTIC RETURN RECEIPT

P 408 532 039

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

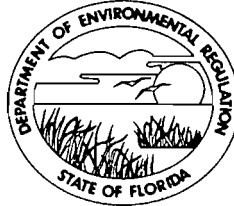
(See Reverse)

|   |           |
|---|-----------|
| 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 |           |
| <b>TOTAL Postage and Fees</b>                                 | <b>\$</b> |
| Postmark or Date  |           |
| 8/25/86   |           |

PS Form 3800, Feb. 1982

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. Robert P. Aston  
Plant Manager  
Reichhold Chemicals, Inc.  
Post Office Box 1433  
Pensacola, Florida 32596

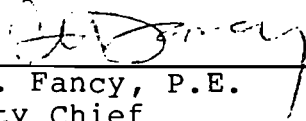
August 22, 1986

Enclosed is Permit Number AC 17-119127 to Reichhold Chemicals, Inc. which authorizes the construction of a 33.5 MMBtu/hr steam boiler at the Reichhold Chemical complex in Pensacola, 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 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

David L. Tyner, P.E.  
Jack Preece

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on August 25, 1986 to the listed persons.

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

Patricia G. Adams August 25, 1986  
Clerk Date

Final Determination

Reichhold Chemicals, Inc.  
Pensacola, Escambia County, Florida

Permit Number AC 17-119127  
Boiler No. 11

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

August 20, 1986

## Final Determination

Reichhold Chemical's application for a permit to construct a steam boiler with 33.5 MMBtu/hr heat input at the Reichhold Chemicals complex in Pensacola, 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 June 25, 1986.

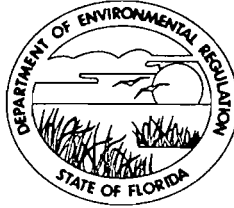
Copies of the preliminary determination have been available for public inspection at the Department's District office in Pensacola and the Bureau of Air Quality Management office in Tallahassee.

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

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

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

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

Permit Number: AC 17-119127  
Expiration Date: March 31, 1987  
County: Escambia  
Latitude/Longitude: 30° 24' 30" N  
87° 14' 45" W  
Project: 33.5 MMBtu/hr Boiler No. 11

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 steam boiler with 33.5 MMBtu/hr heat input located at the Reichhold Chemical Complex, building No. 137-1, in Pensacola, Escambia County, Florida. The boiler is allowed to burn natural gas only.

Construction shall be in accordance with the attached permit application except as otherwise noted on pages 5-6 of this permit, Specific Conditions.

Attachments are as follows:

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

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-119127  
Expiration Date: March 31, 1987

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.



PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-119127  
Expiration Date: March 31, 1987

**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: AC 17-119127  
Expiration Date: March 31, 1987

**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:

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

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

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

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-119127  
Expiration Date: March 31, 1987

**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:**

Boiler No. 11

1. This permit replaces current operating permits AO 17-81419 (Boiler No. 8), AO 17-81423 (Boiler No. 9), and AO 17-81424 (Boiler No. 10). The applicant shall return these operating permits to the Department's Northwest District office after the new unit (Boiler No. 11) is in operation.

2. This boiler shall be allowed to operate continuously (8760 hours per year).

3. This boiler is allowed to burn natural gas only.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-119127  
Expiration Date: March 31, 1987

**SPECIFIC CONDITIONS:**

4. Visible emissions shall not exceed 15% opacity during any 6 minute period. Compliance with this standard shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources as described in Appendix A of 40 CFR 60. The district office shall be notified 15 days prior to test. The test shall be accomplished at 90 to 100 percent of the design capacity.
5. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)
6. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Northwest 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 its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rule 17-4.22 and 17-4.23)
7. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this 20 day of August,  
1986.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_ pages attached.

Table 1  
Summary of Emissions

A) Boiler No. 11

| <u>Pollutant</u> | <u>Potential Emissions</u> |               | <u>Actual Emissions</u> |               |
|------------------|----------------------------|---------------|-------------------------|---------------|
|                  | <u>lb/hr</u>               | <u>ton/yr</u> | <u>lb/hr</u>            | <u>ton/yr</u> |
| NOx              | 4.69                       | 20.50         | 3.51                    | 15.35         |
| SO <sub>2</sub>  | 0.02                       | 0.09          | 0.02                    | 0.07          |
| PM               | 0.10                       | 0.44          | 0.07                    | 0.33          |

B) Net Emissions Changes

|                     | <u>NOx</u>   |               | <u>SO<sub>2</sub></u> |               | <u>PM</u>    |               |
|---------------------|--------------|---------------|-----------------------|---------------|--------------|---------------|
|                     | <u>lb/hr</u> | <u>ton/yr</u> | <u>lb/hr</u>          | <u>ton/yr</u> | <u>lb/hr</u> | <u>ton/yr</u> |
| Boiler #10          | 5.67         | 24.76         | 0.02                  | 0.09          | 0.12         | 0.53          |
| Boiler #9           | standby only |               |                       |               |              |               |
| Boiler #8           | standby only |               |                       |               |              |               |
| Boiler No. 11       |              | 15.35         |                       | 0.07          |              | 0.33          |
| Net Emiss. Decrease |              | -9.41         |                       | -0.02         |              | -0.20         |

\*Potential Emissions are based on the maximum gas consumption and 8736 hour/year.

\*\*Actual Emissions are based on the average gas consumption and 8736 hour/year.

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

The applicant plans to install a 33.5 MMBtu/hr steam boiler to be used at their facility in Pensacola, Florida. The boiler, which will be fired with natural gas only, will replace three existing boilers and is scheduled to operate 8760 hours per year.

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

BACT Determination Requested by the Applicant:

Particulate and sulfur dioxide emissions to be controlled by firing of natural gas.

Date of Receipt of a BACT application:

April 17, 1986

Date of Publication in the Florida Administrative Weekly:

June 20, 1986

Review of Group Members:

The determination was based upon comments received from the Stationary Source Control Section.

BACT Determined by DER:

The amount of particulate and sulfur dioxide emissions emitted from the new boiler will be limited by the firing of natural gas.

Visible Emissions                      Not to exceed 15% opacity.

EPA Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance.

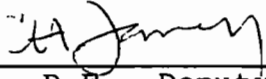
BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern, in that most of the fuel sulfur becomes SO<sub>2</sub> and particulate emissions from fuel burning are related to the sulfur content. The department agrees with the applicant's proposal that the firing of natural gas is BACT for the proposed steam boiler.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

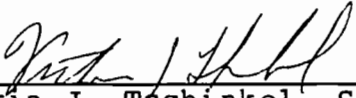
Recommended by:



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

Date: 8/20/86

Approved by:



\_\_\_\_\_  
Victoria J. Tschinkel, Secretary

Date: 8/20/86

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

TO: Victoria J. Tschinkel

FROM: Clair Fancy *CF*

DATE: August 20, 1986

SUBJ: Approval of Air Construction Permit and BACT Determination

|   |                   |
|---|-------------------|
| FOR ROUTING TO OTHER THAN THE ADDRESSEE |                   |
| To: _____                               | RECEIVED          |
| To: _____                               | DATE: AUG 20 1986 |
| To: _____                               | LOCN: _____       |
| FROM: _____                             | DATE: _____       |

Office of the Secretary

Attached for your approval and signature is one air construction permit and BACT determination to Reichhold Chemicals, Inc. to construct a steam boiler at the Reichhold Chemical complex in Pensacola, Escambia County, Florida.

Day 90, after which the permit would be issued by default, is August 24, 1986.

The Bureau recommends your approval and signature.

CF/pa

Attachment



**Reichhold Chemicals, Inc.**

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

DER

JUL 14 1986

**REICHHOLD**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

BAQM

July 10, 1986

Mr. C. H. Fancy, PE  
Deputy Chief  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, FL 32301-8241

*Copy for  
Leresa &  
put original  
in filing  
stack -*

Re: DER File No. AC 17-119127

Dear Mr. Fancy:

Attached is the proof of publication of the notice of intent to issue a permit to construct a steam boiler (No. 11) at Reichhold's Pensacola, FL facility, as required by your June 17, 1986 letter.

If you require any further information please write or call me.

Sincerely,

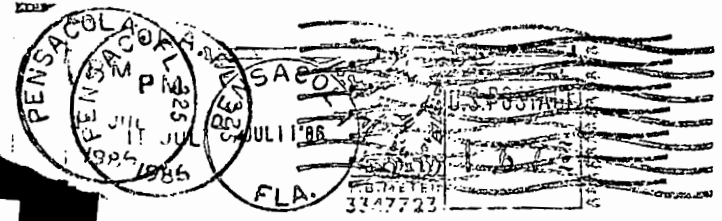


R. P. Aston  
Plant Manager

pc Mr. Jack Preece - DER Pensacola  
Mr. R. W. Clarke  
Mr. W. G. Branson

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

**CERTIFIED**  
P 743 642 353  
**MAIL**



CERTIFIED MAIL-  
RETURN RECEIPT REQUESTED  
**REICHHOLD**

MR. C. H. FANCY, PE - DEPUTY CHIEF  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
BUREAU OF AIR QUALITY MANAGEMENT  
2600 BLAIR STONE ROAD  
TALLAHASSEE FL 32301-8241



DER

JUL 14 1986

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

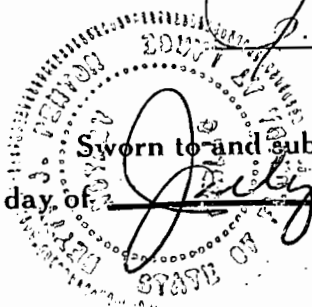
who on oath says that she is Legal Advertising Supervisor of the Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the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

DER Notice of Intent in the \_\_\_\_\_ Court,

was published in said newspaper in the issues of June 25, 1986

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 July day of July, A.D., 1986  
Letty J. Canton  
NOTARY PUBLIC.



My Commission Expires Oct. 16, 1987

### State of Florida Department of Environmental Regulations Notice of Intent

The Department gives notice of its intent to issue a permit to Reichhold Chemicals, Inc. for the construction of a steam boiler with 33.5 MMBtu/hr heat input to be located at the Reichhold Chemical Complex, building No. 137-1, in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 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  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

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

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. 31552 1T JUNE 25, 1986

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.

1.  Show to whom, date and address of delivery.

2.  Restricted Delivery.

3. Article Addressed to:  
 Mr. Robert P. Aston  
 Reichhold Chemicals, Inc.  
 P. O. Box 1433  
 Pensacola, Florida 32596

|   |                |
|---|----------------|
| 4. Type of Service:   | Article Number |
| <input type="checkbox"/> Registered <input type="checkbox"/> Insured<br><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD<br><input type="checkbox"/> Express Mail | P 408 532 117  |

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

5. Signature - Addressee  
 X

6. Signature - Agent  
 X *Karen L. Moore*

7. Date of Delivery  
 6-20-86

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

DOMESTIC RETURN RECEIPT

P 408 532 117  
 RECEIPT FOR CERTIFIED MAIL  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

|   |    |
|---|----|
| Sent to<br>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<br><br>6/18/86                               |    |

PS Form 3800, Feb. 1982

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

June 17, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

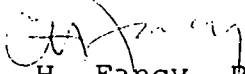
Mr. Robert P. Aston  
Plant Manager  
Reichhold Chemicals, Inc.  
Post Office Box 1433  
Pensacola, Florida 32596

Dear Mr. Aston:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a steam boiler (No. 11) at your facility in Pensacola, Escambia County, Florida.

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.  
Jack Preece

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department gives notice of its intent to issue a permit to Reichhold Chemicals, Inc. for the construction of a steam boiler with 33.5 MMBtu/hr heat input to be located at the Reichhold Chemical Complex, building No. 137-1, in Pensacola, Escambia County, Florida. A determination of best available control technology (BACT) was required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 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  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

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

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.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Reichhold Chemicals, Inc.  
Post Office Box 1433  
Pensacola, Florida 32596

---

DER File No. AC 17-119127

INTENT TO ISSUE

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

The applicant, Reichhold Chemicals, Inc., applied on April 17, 1986, to the Department of Environmental Regulation for a permit to construct a steam boiler with 33.5 MMBtu/hr heat input. The proposed construction will be located at the Reichhold Chemical Complex, Building No. 137-1, in Pensacola, Escambia County, Florida.

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

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

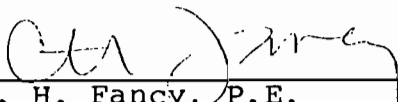


the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

Robert P. Aston, Reichhold Chemicals, Inc.  
David L. Tyner, P.E., Reichhold Chemicals, Inc.  
Jack Preece, DER Northwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on June 18, 1986.

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

Patricia G. Adams June 18, 1986  
Clerk Date

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.

**DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103**

the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law

Implemented: 120.53, F.S.

History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

**17-103.160 Uniformity in Approval and Denial of Applications for Department Permits and Certifications.**

To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

**17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.**

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,

17-103.155(5) -- 17-103.170(3)

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

**DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103**

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 an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit. Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S. History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

**17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.**

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

17-103.150(3)(d) -- 17-103.155(1)(a)

Technical Evaluation  
and  
Preliminary Determination

Reichhold Chemicals, Inc.  
Pensacola, Escambia County, Florida

Permit Number AC 17-119127  
Boiler No. 11

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

June 16, 1986

I. NAME AND ADDRESS OF APPLICANT

Reichhold Chemicals, Inc.  
Resins & Binders Division  
Post Office Box 1433  
Pensacola, Florida 32596

II. REVIEWING AND PROCESS SCHEDULE

Date of receipt of application: April 17, 1986

Completeness review: May 17, 1986

Application completeness date: April 17, 1986

III. FACILITY INFORMATION

III.1 Facility Location

The proposed source, identified as Boiler #11, will be located at the Reichhold Chemical complex, building 137-1, 407 South Space Boulevard in Pensacola, Escambia County, Florida. The latitude and longitude of this site are 30° 24' 30" N and 87° 14' 45" W, respectively.

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

Reichhold Chemicals, Inc. is 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

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

III.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, to install a new 33.5 MMBtu/hr steam boiler, will reduce total PM, NO<sub>x</sub>, and SO<sub>2</sub> emissions by 9.7 ton/yr.

IV. PROJECT DESCRIPTION

The proposed project consists of the installation of a new 33.5 MMBtu/hr fire tube boiler burning natural gas to generate a maximum of 27,600 lb/hr of steam at a maximum design pressure of



200 psig. The completion of this new boiler facility will result in the shutdown and removal of three (3) existing permitted boilers: Boiler No. 10 (AO 17-81424), Boiler No. 9 (AO 17-81423), and Boiler No. 8 (AO 17-81419). The new boiler facility will have one emission stack identified as vent 137-1.

## V. RULE APPLICABILITY

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

The proposed facility, boiler No. 11, will be 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 (PM) and volatile organic compounds (VOC). The proposed project will reduce pollutant emissions as shown in Table 1.

The proposed project is exempt from provisions of Rule 17-2.500, Prevention of Significant Deterioration. PSD requirements do not apply since there is a net emission decrease for all pollutants emitted.

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

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

## VI. SOURCE IMPACT ANALYSIS

### VI.1 Emission Summary

The installation of boiler No. 11 will produce emissions of NOx, SO<sub>2</sub> and PM, to the atmosphere.

A best available control technology (BACT) has been determined for this source. The emission limiting standard selected as BACT is a condition of the permit. The allowable emissions for this unit are summarized in Table 1. This table also shows the net emission decrease due to the shutdown of the existing boilers.

### VI.2. Air Quality Analysis

From a technical review of the application, the Department has determined that the construction and operation of this unit

will not have a detrimental impact on Florida's ambient air quality standards.

#### VII. CONCLUSION

Based on a review of the data submitted by Reichhold, the Florida Department of Environmental Regulation (FDER) concludes that compliance with all applicable state air quality regulations will be achieved, provided certain specific conditions are met. The impact of installing a new boiler (Boiler No. 11) 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.  
407 South Pace Boulevard  
P.O. Box 1433  
Pensacola, Florida 32596

Permit Number: AC 17-119127  
Expiration Date: December 31, 1986  
County: Escambia  
Latitude/Longitude: 30° 24' 30" N  
87° 14' 45" W  
Project: 33.5 MMBtu/hr Boiler No. 11

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 steam boiler with 33.5 MMBtu/hr heat input located at the Reichhold Chemical Complex, building No. 137-1, in Pensacola, Escambia County, Florida. The boiler is allowed to burn natural gas only.

Construction shall be in accordance with the attached permit application except as otherwise noted on pages 5-6 of this permit, Specific Conditions.

Attachments are as follows:

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

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-119127  
Expiration Date: December 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: AC 17-119127  
Expiration Date: December 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: AC 17-119127  
Expiration Date: December 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: AC 17-119127  
Expiration Date: December 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:**

Boiler No. 11

1. This permit replaces current operating permits AO 17-81419 (Boiler No. 8), AO 17-81423 (Boiler No. 9), AO 17-81424 (Boiler No. 10): The applicant shall return these operating permits to the Department's District office after the new unit (Boiler No. 11) is in operation.
2. This boiler shall be allowed to operate continuously (8760 hours per year).
3. This boiler is allowed to burn natural gas only.

PERMITTEE:  
Reichhold Chemicals, Inc.

Permit Number: AC 17-119127  
Expiration Date: December 31, 1986

**SPECIFIC CONDITIONS:**

4. Visible emissions shall not exceed 15% opacity during any 6 minute period. Compliance with this standard shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources as described in Appendix A of 40 CFR 60. The district office shall be notified 15 days prior to test. The test shall be accomplished at 90 to 100 percent of the design capacity.
5. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)
6. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Northwest 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 its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rule 17-4.22 and 17-4.23)
7. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ pages attached.



Table 1  
Summary of Emissions

A) Boiler No. 11

| <u>Pollutant</u> | <u>Potential Emissions</u> |               | <u>Actual Emissions</u> |               |
|------------------|----------------------------|---------------|-------------------------|---------------|
|                  | <u>lb/hr</u>               | <u>ton/yr</u> | <u>lb/hr</u>            | <u>ton/yr</u> |
| NOx              | 4.69                       | 20.50         | 3.51                    | 15.35         |
| SO <sub>2</sub>  | 0.02                       | 0.09          | 0.02                    | 0.07          |
| PM               | 0.10                       | 0.44          | 0.07                    | 0.33          |

B) Net Emissions Changes

|                     | <u>NOx</u>   |               | <u>SO<sub>2</sub></u> |               | <u>PM</u>    |               |
|---------------------|--------------|---------------|-----------------------|---------------|--------------|---------------|
|                     | <u>lb/hr</u> | <u>ton/yr</u> | <u>lb/hr</u>          | <u>ton/yr</u> | <u>lb/hr</u> | <u>ton/yr</u> |
| Boiler #10          | 5.67         | 24.76         | 0.02                  | 0.09          | 0.12         | 0.53          |
| Boiler #9           | standby only |               |                       |               |              |               |
| Boiler #8           | standby only |               |                       |               |              |               |
| Boiler No. 11       |              | 15.35         |                       | 0.07          |              | 0.33          |
| Net Emiss. Decrease |              | -9.41         |                       | -0.02         |              | -0.20         |

\*Potential Emissions are based on the maximum gas consumption and 8736 hour/year.

\*\*Actual Emissions are based on the average gas consumption and 8736 hour/year.

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

The applicant plans to install a 33.5 MMBtu/hr steam boiler to be used at their facility in Pensacola, Florida. The boiler, which will be fired with natural gas only, will replace three existing boilers and is scheduled to operate 8760 hours per year.

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

BACT Determination Requested by the Applicant:

Particulate and sulfur dioxide emissions to be controlled by firing of natural gas.

Date of Receipt of a BACT application:

April 17, 1986

Date of Publication in the Florida Administrative Weekly:

June 20, 1986

Review of Group Members:

The determination was based upon comments received from the Stationary Source Control Section.

BACT Determined by DER:

The amount of particulate and sulfur dioxide emissions emitted from the new boiler will be limited by the firing of natural gas.

Visible Emissions                      Not to exceed 15% opacity.

DER Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern, in that most of the fuel sulfur becomes SO<sub>2</sub> and particulate emissions from fuel burning are related to the sulfur content. The department agrees with the applicant's proposal that the firing of natural gas is BACT for the proposed steam boiler.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Recommended by:

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

Date: \_\_\_\_\_

Approved by:

Victoria J. Tschinkel, Secretary

Date: \_\_\_\_\_

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND

04604432

**REICHHOLD**

62-26  
311

319-09

White Plains, N.Y. 10603

CHECK DATE

WHITE PLAINS, N.Y.

04 15 86

MO. DAY YR.

| DOLLARS         | CENTS |
|-----------------|-------|
| PAY *****100.00 |       |

REICHHOLD CHEMICALS, INC.

TO THE Department of Environmental Regulation  
ORDER 2600 Blairstone Road  
OF Tallahassee, FL 32301

MANUFACTURERS HANOVER, BANK (DELAWARE)

*John M. Hill*

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

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 76117

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Reichhold Chemicals, Inc. Date April 17, 1986

Address P.O. Box 1433, Pensacola, FL 32596 Dollars \$ 100.00

Applicant Name & Address Same as above

Source of Revenue \_\_\_\_\_

Revenue Code 001031 Application Number AC 17-119127

By Patricia G. Adams

**Reichhold Chemicals, Inc.**

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

April 14, 1986

**REICHHOLD**

---

DER  
APR 17 1986  
BAQM

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

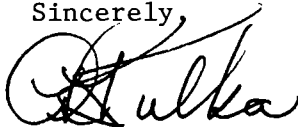
Dear Mr. Fancy:

The enclosed construction permit application for a new 800 HP steam boiler facility at our Pensacola Plant will replace three existing old and inefficient boilers. As soon as the new unit is completed, existing boilers #8, #9, and #10 (i.e., Permit Nos. A017-81419, A017-81423 and A017-81424 respectively) will be discontinued and permanently removed from service. Installation of the new boiler facility will result in a net reduction of 9.7 tons/yr. of NO<sub>x</sub>, SO<sub>2</sub> particulates.

Also enclosed is a check in the amount of \$100 covering the permit application fee.

If you have any questions or require additional information, please call me at 904/433-7621, Ext. 542.

Sincerely,



Allan R. Kulka  
Senior Engineer

ARK:mpm

Encl.

pc: R. P. Aston - Reichhold  
W. G. Branson - Reichhold  
G. B. Mitrovich - Reichhold  
T. W. Moody - FL DER, Pensacola

AC 17-119127

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: Steam Boiler  New<sup>1</sup>  Existing<sup>1</sup>

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) Boiler#11 Gas Fired

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East 476.4 North 3363.9

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

APPLICANT NAME AND TITLE: Robert P. Aston - Plant Manager

APPLICANT ADDRESS: P. O. Box 1433, Pensacola, Florida 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: Robert P. Aston

Robert P. Aston, Plant Manager  
Name and Title (Please Type)

Date: 4/14/86 Telephone No. 904-433-7621

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

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

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

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



Signed *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: 4/14/86

Telephone No. 904-433-7621

**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.

Install new natural gas-fired 27,600 #/hr. steam boiler in new building. Once the new boiler is in operation, the existing old 80,000 #/hr boiler #10 (Permit #A017-81424) will be removed from service. The replacement of Boiler #10 with new unit will result in a total reduction of 9.7 tons/yr of NO<sub>x</sub> SO<sub>2</sub> and particulate.

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

Start of Construction May 19, 1986 Completion of Construction June 16, 1986

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Not applicable.

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

Completion of this new boiler facility will result in cancellation of:

Permit # A017-81424 - Boiler #10, issued 4/9/84; expiration 4/1/89.

Permit # A017-81423 - Boiler #9; issued 4/5/84; expiration 4/1/89.

Permit # A017-81419 - Boiler #8; issued 4/5/84; expiration 4/1/89.

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 justifi-  
cation for any answer of "No" that might be considered questionable.



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

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

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

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

- Total Process Input Rate (lbs/hr): N/A
- Product Weight (lbs/hr): N/A

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

| Name of Contaminant | Emission <sup>1</sup>            |             | Allowed Emission Rate per Rule 17-2 | Allowable <sup>3</sup> Emission lbs/hr | Potential <sup>4</sup> Emission |       | Relate to Flow Diagram |
|---------------------|----------------------------------|-------------|-------------------------------------|--|---------------------------------|-------|------------------------|
|                     | Maximum lbs/hr                   | Actual T/yr |                                     |  | lbs/yr                          | T/yr  |                        |
| NO <sub>x</sub>     | 4.69                             | 15.35       | -                                   | Visible                                | 40,971.8                        | 20.5  | SKA-2055               |
| SO <sub>2</sub>     | 0.0201                           | 0.066       | -                                   | Emissions                              | 175.6                           | 0.088 |                        |
| Particulate         | 0.1005                           | 0.33        | 10.5#/M BTU                         | 30%                                    | 877.9                           | 0.44  |                        |
|                     | used natural gas                 |             | per 17-2.600 (10)(b)2b              | per 17-2.600 (10)(b)2a                 |                                 |       |                        |
|                     | emission standards from EPA-AP42 |             |                                     |  |                                 |       |                        |

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

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

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

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



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

Stack Height: 25 ft. Stack Diameter: 2.1 ft.  
 Gas Flow Rate: 10733 ACFM 6605 DSCFM Gas Exit Temperature: 285 °F.  
 Water Vapor Content: 12 % Velocity: 47.7 FPS

**SECTION IV: INCINERATOR INFORMATION**

NOT APPLICABLE

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

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

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

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

Manufacturer \_\_\_\_\_

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

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

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

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

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

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

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

N/A

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

N/A

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

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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

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

NOT APPLICABLE SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes  No

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
| _____       | _____                 |
| _____       | _____                 |
| _____       | _____                 |
| _____       | _____                 |

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?

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
| _____       | _____                 |
| _____       | _____                 |
| _____       | _____                 |
| _____       | _____                 |

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

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

\*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

| Contaminant | Rate or Concentration |
|-------------|-----------------------|
|             |                       |
|             |                       |
|             |                       |

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

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

1.

a. Control Device:

b. Operating Principles:

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

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

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

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

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

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

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

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

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

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

j. Applicability to manufacturing processes:

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

3.

a. Control Device:

b. Operating Principles:

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

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

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

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

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

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

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

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

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

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

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

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

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

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





2. Instrumentation, Field and Laboratory

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

B. Meteorological Data Used for Air Quality Modeling

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

C. Computer Models Used

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

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

D. Applicants Maximum Allowable Emission Data

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

E. Emission Data Used in Modeling

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

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

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

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

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

Project Description:

This project consists of the installation of a new 800 H.P. package fire tube boiler burning natural gas to generate a maximum of 27,600#/hr. of steam at a maximum design pressure of 200 psig. The completion of this new boiler facility will result in the shutdown and removal of three (3) existing permitted boilers: i.e.

- Boiler #10 (Permit # A017-81424) with a maximum steam capacity of 80,000 #/hr., currently fired on natural gas.
- Boiler #9 (Permit # A017-81423) - standby only - with a maximum steam capacity of 80,000 #/hr.
- Boiler #8 (Permit # A017-81419) - standby only - with a maximum steam capacity of 34,000 #/hr.

The new boiler facility will result in one emission stack identified as vent 137-1 (see attached plot plan sketch SKA-2056).

APPLICATION TO CONSTRUCT  
SECTION II: GENERAL PROJECT INFORMATION  
ITEM F.3. "PSD REQUIREMENTS"  
NET EMISSIONS DECREASE DETERMINATION  
NEW PACKAGE BOILER FACILITY  
REICHHOLD CHEMICALS, INC.  
PENSACOLA, FLORIDA PLANT

EXISTING OPERATIONS TO BE SHUTDOWN:

| <u>Permit #</u>             | <u>Description</u>             | <u>Max. Steam Generation</u> | <u>Act. Steam Generation</u> | <u>Est. % Eff.</u> | <u>Max.Nat.Gas Consumption</u> | <u>Calculated Emissions Avg.#/hr</u> |                       |                    |
|-----------------------------|--------------------------------|------------------------------|------------------------------|--------------------|--------------------------------|--------------------------------------|-----------------------|--------------------|
|                             |                                |                              |                              |                    |                                | <u>NO<sub>2</sub></u>                | <u>SO<sub>2</sub></u> | <u>Particulate</u> |
| A017-81424                  | Boiler #10                     | 80,000#/hr                   | 30,000#/hr                   | 74                 | 0.040mmcf/hr                   | 5.67                                 | 0.024                 | 0.121              |
| A017-81423                  | Boiler # 9                     | 80,000#/hr                   | --Standby Only ---           |                    |                                |                                      |                       |                    |
| A017-81419                  | Boiler # 8                     | 34,000#/hr                   | --Standby Only ---           |                    |                                |                                      |                       |                    |
| <u>NEW BOILER OPERATION</u> |                                |                              |                              |                    |                                |                                      |                       |                    |
|                             | Boiler #11                     | 27,600#/hr                   | 21,000#/hr                   | 82.5               | 0.0251mmcf/hr                  | 3.51                                 | 0.0151                | 0.0753             |
| °°                          | NET EMISSIONS DECREASE         |                              |                              |                    |                                | 2.16                                 | 0.0089                | 0.0457             |
|                             | PSD requirements do not apply. |                              |                              |                    |                                |                                      |                       |                    |

BASIS OF EMISSION CALCULATIONS:

The calculate emissions were determined using standard factors from EPA-AP42, i.e.:

$$\text{NO}_x = 140\#/\text{mmcf of natural gas consumed.}$$

$$\text{SO}_2 = 0.6\#/\text{mmcf of natural gas consumed.}$$

$$\text{Particulate} = 1-5\#/\text{mmcf of natural gas consumed.}$$

(i.e. a value of 3#/mmcf was used for particulate calculations).

APPLICATION TO CONSTRUCT  
SECTION V: SUPPLEMENTAL REQUIREMENTS

Items 2 & 3 - "Basis of Emission - Estimate & Potential Emissions Determination"

Standard factors for NO<sub>x</sub>, SO<sub>2</sub> and Particulate for natural gas as defined in AP42 were used to calculate emissions; i.e.

New Boiler Maximum Exmissions

NO<sub>x</sub> = 140#/mmcf gas consumed X 0.0335mmcf/hr (max) gas consumed = 4.69#/hr

SO<sub>2</sub> = 0.6#/mmcf gas consumed X 0.0335mmcf/hr (max) gas consumed = 0.0201#/hr

Particulate = 3#/mmcf gas consumed X 0.0335mmcf/hr (max) gas consumed = 0.1005#/hr

New Boiler Actual Emissions

Estimate average gas consumption = 0.0251mmcf/hr

∴

NO<sub>x</sub> = 140 X 0.0251 X 8736 hr/yr ÷ 2000#/T = 15.35 T/yr

SO<sub>2</sub> = 0.6 X 0.0251 X 8736 hr/yr ÷ 2000#/T = 0.066 T/yr

Particulate = 3 X 0.0251 X 8736 hr/yr ÷ 2000#/T = 0.330 T/yr

Items 4 & 5 - "Design Details of Air Control Equipment"

New package boiler has been selected on basis of maximum efficiency available. Unit is equipped with a stack economizer that will recover heat from stack emissions by preheating boiler feedwater.

Items 6, 7 & 8

See attached sketches and section from USGS Pensacola Quadrangle.

Item 9

A check for \$100 made out to the State of Florida Department of Environmental Regulation is attached with this construction permit application. Please send a receipt for this application fee to Reichhold Chemicals, Inc., P. O. Box 1433, Pensacola, Florida 32596, Attention A. R. Kulka.

Item 10

Not applicable.

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<br>3 Million BTU/Hr Max Input<br>Natural Gas Only | Particulates               | .044              | .048                 |
|                   |  | NOx                        | .375              | .406                 |
|                   |  | HC                         | .100              | .108                 |
|                   |  | S02                        | .001              | .0011                |
| A017-93689        | Dowtherm Heater #2<br>3 Million BTU/Hr Max Input<br>Natural Gas Only | Particulates               | .037              | .040                 |
|                   |  | NOx                        | .312              | .338                 |
|                   |  | HC                         | .033              | .09                  |
|                   |  | S02                        | .001              | .0011                |
| A017-93690        | Reactor #7 Furnace<br>6 Million BTU/Hr<br>Natural Gas Only           | Particulates               | .055              | .220                 |
|                   |  | NOx                        | .363              | .45                  |
|                   |  | HC                         | .122              | .408                 |
|                   |  | S02                        | .002              | .008                 |
| A017-81422        | Resin Flaking & Bagging<br>Building #65                              | Particulates<br>Resin Dust | 0.42              | 14.2                 |
| A017-73934        | Resin Flaking & Bagging<br>Building #56                              | Particulates<br>Resin Dust | 0.88              | 13.7                 |
| A017-73937        | Resin Crushing & Bagging<br>Building #91                             | Particulates<br>Resin Dust | .052              | 5.2                  |
| A017-60662        | Flaker Baghouse - South<br>Plant Flaking & Crushing                  | Particulates<br>Resin Dust | .36               | 36                   |

Air Emission Inventory (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> - Dimer<br><u>Generic Name</u> - Mixed Aromatic/Aliphatic HC<br><u>Vapor Pressure</u> - 0.003mm Hg @ 100°F | Toluene Aromatic HC<br>VM&P Naphtha Aliphatic HC<br>Limonene Monocyclic Terpene HC | Alpha & Beta Pinene Bicyclic Terpene HC<br>9mm Hg @ 100°F |   |
| A017-73935        | Zinc Resinate Process   | Hydrocarbons   | 19.8 TPY  | 52.65 TPY                                   |
|                   | <u>Hydrocarbon</u> - Mineral Spirits<br><u>Generic Name</u> - Aliphatic HC<br><u>Vapor Pressure</u> - 1.4mm Hg @ 70°F         | Rosin Oil<br>Disproportionated Wood Rosin<br>.003mm Hg @ 100°F                     |   |   |
| A017-73935        | Organic Coatings Process  | Hydrocarbons   | 8.75 TPY  | 50.5 TPY                                    |
|                   | <u>Hydrocarbon</u> - VM&P<br><u>Generic Name</u> - Aliphatic HC<br><u>Vapor Pressure</u> - 15mm Hg @ 100°F                    | Mineral Spirits Aliphatic HC<br>1.4mm Hg @ 20°F                                    | Vinyl Toluene Aromatic HC<br>1.1mm Hg @ 68°F              |   |
| A017-73933        | **Terpene-Phenol Resin Process  | Hydrocarbons   | 67.8 TPY  | 72.0 TPY                                    |
|                   | <u>Hydrocarbon</u> - Alpha Pinene<br><u>Generic Name</u> - Terpene HC<br><u>Vapor Pressure</u> - 9 mmHg @ 100°F               | Toluene Aromatic HC<br>22 mmHg @ 68°F  | Phenol Aromatic HC<br>0.1mm Hg @ 68°F                     | Dimer Mixed Aro/Ali HC<br>0.05mm Hg @ 100°C |
| A017-81421        | * Paramenthane Hydroperoxide Process  | Hydrocarbons   | *0 TPY  | 39.8 TPY                                    |
|                   | <u>Hydrocarbon</u> - Paramenthane<br><u>Generic Name</u> - Terpene HC<br><u>Vapor Pressure</u> - 7 mm Hg @ 100°F              |  |   |   |

Air Emission Inventory (continued)

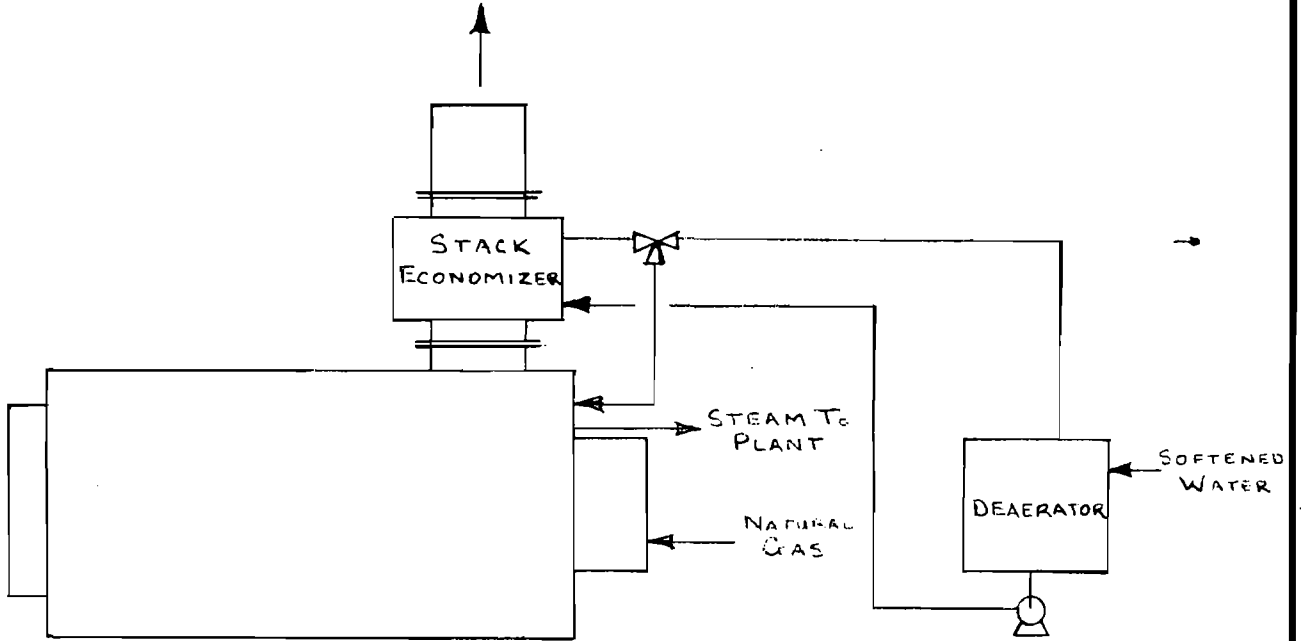
| <u>Permit No.</u> | <u>Process</u>                    | <u>Pollutant</u>                           | <u>TPY Actual</u>        | <u>TPY Potential</u> |
|-------------------|-----------------------------------|--|--------------------------|----------------------|
| A017-93677        | South Plant Main Process Scrubber | Oclors                                     | 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 units for standby only.

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

MAX. EMISSION:  
 NO<sub>x</sub> = 20.5 T/YR  
 SO<sub>2</sub> = 0.088 T/YR  
 PARTICULATE = 0.44 T/YR

VENT 137-1  
 285°F



APPLICATION TO CONSTRUCT  
 SECTION V ITEM NO. 6

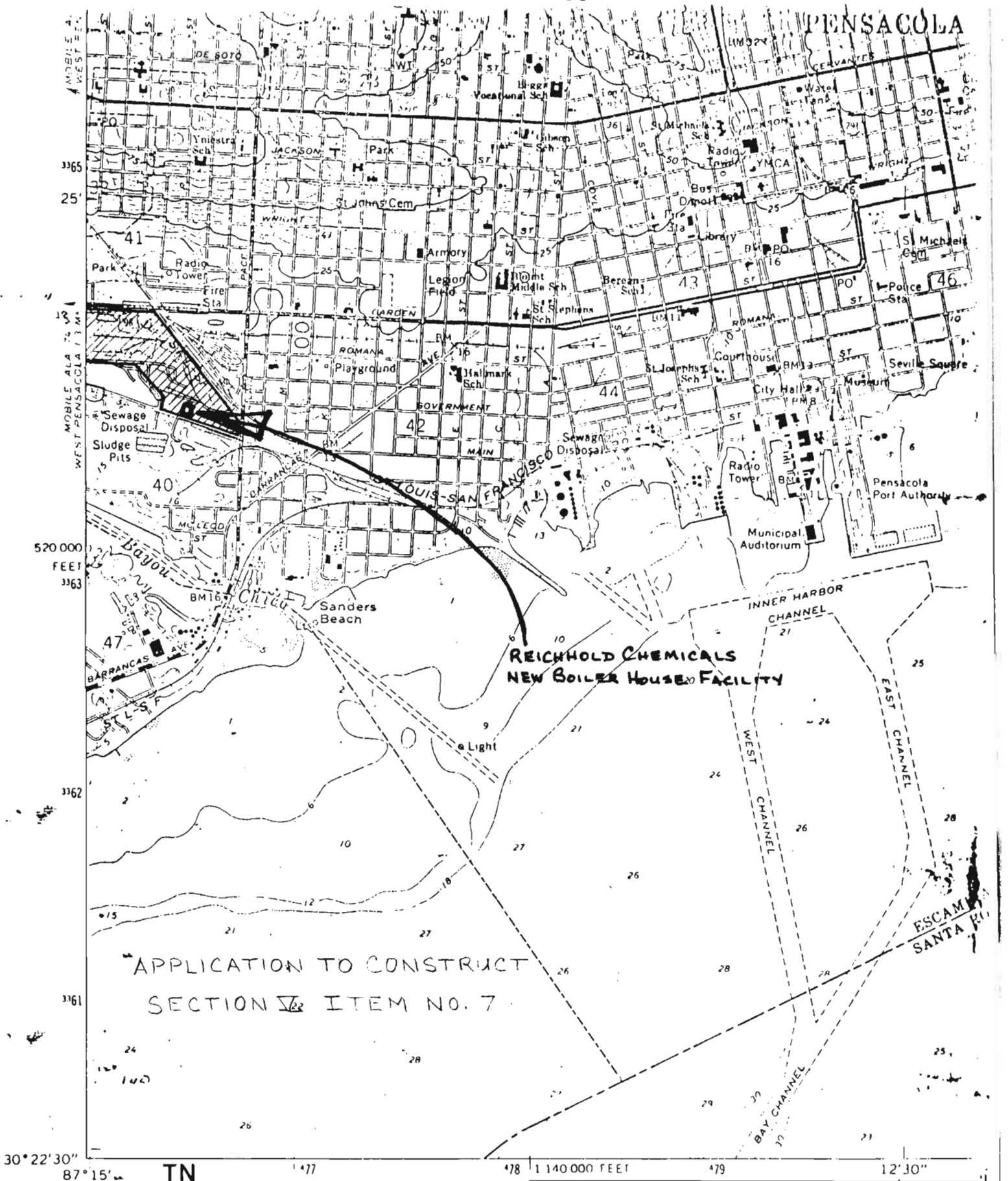


REICHOLD CHEMICALS, INC.  
 Resins & Binders Division  
 Pensacola, Florida

NEW 800 H.P. BOILER FACILITY

| 3   |      |           |     |      |      | DR. ARK      | ENG.  | APPD ARK |
|-----|------|-----------|-----|------|------|--------------|-------|----------|
| 2   |      |           |     |      |      | DATE 4/11/86 | SCALE | SKA-2055 |
| 1   |      |           |     |      |      |              |       |          |
| NO. | DATE | REVISIONS | DR. | ENG. | APP. | DATE         | SCALE |          |





GN 0° 06'

MN 4°

71 MILS

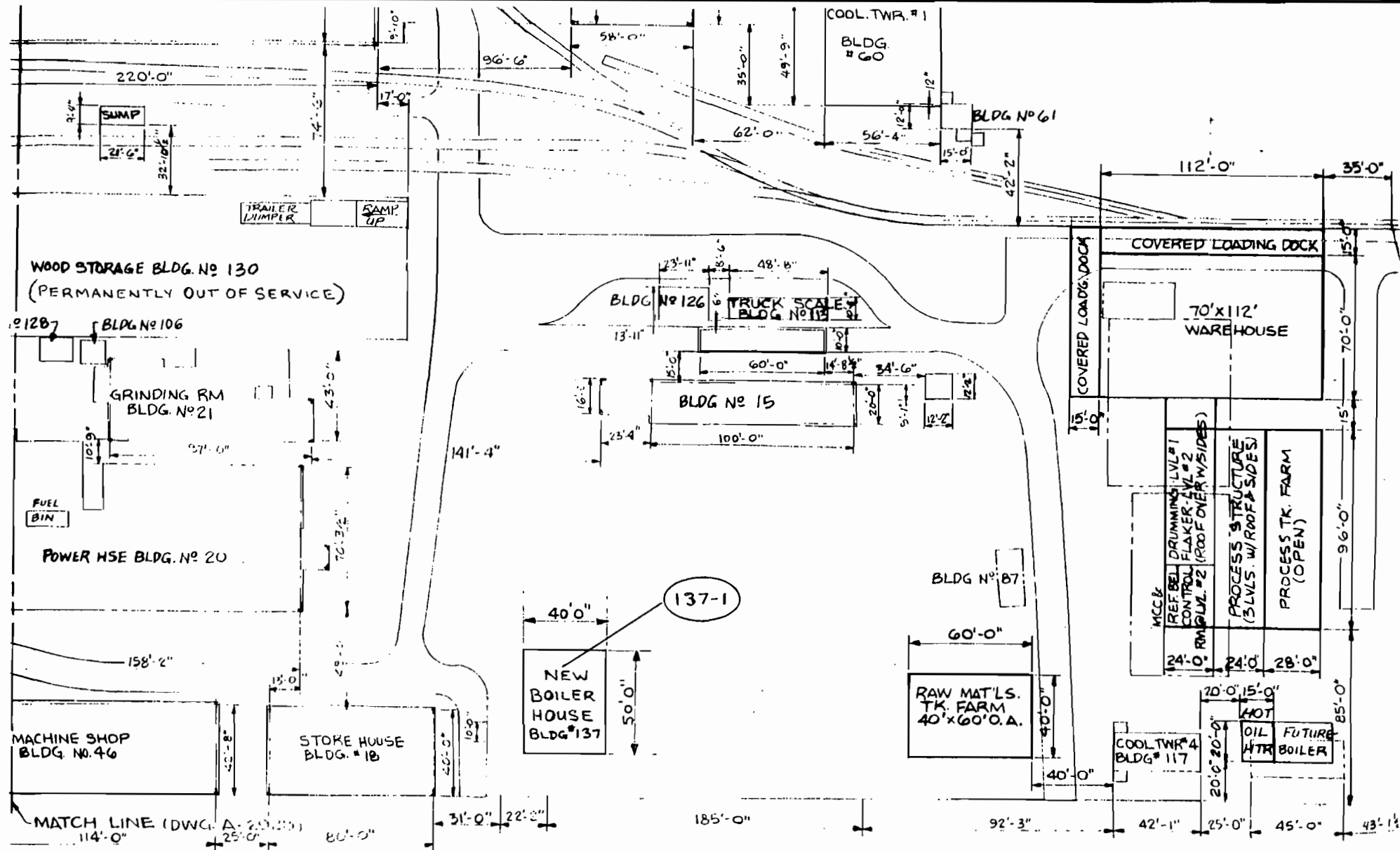
Scale 1: 24,000

FIG. B

LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970  
AMS354INW - SERIES V847  
REICHOLD CHEMICALS, INC.  
PENSACOLA, ESCAMBIA, FLORIDA  
DEC. 21, 1972

SPT 1 OF 1



APPLICATION TO CONSTRUCT  
SECTION V: ITEM 8

**NOTICE**

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



REICHOLD CHEMICALS, INC.

| 3   |      |           |     |      |      | PLOT PLAN - BLDG No. 137<br>NEW BOILER HOUSE |       |           |
|-----|------|-----------|-----|------|------|--|-------|-----------|
| 2   |      |           |     |      |      | DR. ARK                                      | ENG.  | APPD. ARK |
| 1   |      |           |     |      |      | DATE 4-8-86                                  | SCALE | SKA-2056  |
| NO. | DATE | REVISIONS | DR. | ENG. | APP. |  |       |           |