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

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

3. Article Addressed to:
Mr. Philip P. Ulichney
Plant Manager
Reichhold Chemicals, Inc.
P. O. Box 1433
Pensacola, FL 32596

4. Article Number
P 274 007 607

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

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Address
X

6. Signature — Agent
X J. Hart

7. Date of Delivery

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

PENSACOLA FLA MAR 16 1989 3PM

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

P 274 007 607

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

Sent to Mr. Philip P. Ulichney, Reichhold Chemical	
Street and No. P.O. Box 1433	
P.O., State and ZIP Code Pensacola, FL 32596	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 3-15-89 Permit: AC 17-154330, -31, 32 -33, -35, -36, -37, -39	

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

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Philip P. Ulichney, Plant Manager
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, FL 32596

March 14, 1989

Enclosed are construction permits Nos. AC 17-154330, AC 17-154331, AC 17-154332, AC 17-154333, AC 17-154335, AC 17-154336, AC 17-154337, and AC 17-154339 for Reichhold Chemicals, Inc. to construct eight above ground storage tanks for several volatile organic compounds at the existing chemical complex in Pensacola. These permits are issued pursuant to Section 403, Florida Statutes.

Any party to these permits has the right to seek judicial review of the permits 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 these permits are filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 3-15-89.

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

Martha Wise
Clerk

3-15-89
Date

Final Determination

Reichhold Chemicals, Inc.
Pensacola, Escambia County, Florida

Permit Numbers:

AC 17-154330
AC 17-154331
AC 17-154332
AC 17-154333
AC 17-154334
AC 17-154335
AC 17-154336
AC 17-154337
AC 17-154339

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

March 9, 1989

Final Determination

Reichhold Chemicals Inc.'s applications for permits to construct eight (8) above ground storage tanks for several volatile organic compounds at their existing facility in Pensacola, Escambia County, Florida, have been reviewed by the Bureau of Air Quality Management.

Public Notice of the Department's Intent to Issue the construction permits was published in the Pensacola News Journal on January 25, 1989.

Copies of the Preliminary Determination have been available for public inspection at the Northwest District office in Pensacola, Florida and the Department's Bureau of Air Quality Management office in Tallahassee.

Comments were received from Commissioner Kenneth J. Kelson on January 31, 1989. In his letter, he expressed some concerns on behalf of the Pensacola citizens. The Bureau (Mr. Bill Thomas, Chief Engineer) discussed this facility modification with Commissioner Kelson and asked him to contact the Bureau if he had additional questions on these sources. After reviewing the Technical Evaluation and Preliminary Determination, Commissioner Kelson did not request additional information on the matter.

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

Attachment to be Incorporated

Commissioner Kenneth J. Kelson's letter of January 26, 1989.

BOARD OF COUNTY COMMISSIONERS
ESCAMBIA COUNTY, FLORIDA
223 PALAFOX PLACE
P.O. BOX 1591
PENSACOLA, FLORIDA 32597-1591
TEL. (904) 436-5783
(SUNCOM) 682-5783
TELEFAX (904) 436-5813

WAYNE PEACOCK
COUNTY ADMINISTRATOR

January 26, 1989

Mr. Bill Thomas
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas

A number of citizens have contacted my office regarding their concerns about the issuance of permits to Reichhold Chemical, Inc. to construct eight (8) above ground storage tanks for volatile organic compounds. It would be most helpful in responding to these concerns if the Department of Environmental Regulation would hold a public hearing to allow local citizens to obtain more information regarding these tanks and the compounds which will be stored in them.

You favorable consideration of this request would be most appreciated.

Sincerely,

Kenneth J. Kelson
Commissioner
District 2

KJK:BK:ddl

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

Notice of Issuance

in the _____ Court,

was published in said newspaper in the issues of

Jan. 25, 1989

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 1st day of Feb. A.D., 1989

Barry J. Fisher
NOTARY PUBLIC.

My Commission Expires October 26, 1991

Department of Environmental Regulation
Notice of Issuance

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Riechhold Chemicals Inc. to construct eight aboveground storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent ot minimize loss of volatile vapors. The tanks will be located at the existing Reichhold CHemical Complex at 407 South Pace Boulevard, Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in teh proceeding. A petitionf or intervention must be filed prusuant 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 Heairngs, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

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

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

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

Legal No. 35351 1T
Jan. 25, 1989

Florida Department of Environmental Regulation

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

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154330
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 10,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-806 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-806	Methacyclic Acid 100%	10,000 gals	18'	208,500 gals	0.005 lbs/hr	0.024

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154330
Expiration Date: July 31, 1989

Issued this 10 day
of March, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154331
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 24,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-500 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibrationand maintenance records and all original stripchart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used tocomplete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-500	Butyl Cello-solve (25%) Resin Solids (75%)	24,000 gals	24'	1,296,000 gals	0.0004 lbs/hr	0.0002

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154331
Expiration Date: July 31, 1989

Issued this 12 day
of July, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154332
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-504 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-504	Naptha (25%) Resin Solids (75%)	12,500 gals	22'	524,000 gals	0.059 lbs/hr	0.259

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154332
Expiration Date: July 31, 1989

Issued this 1st day of June, 1989

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154333
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 10,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-709 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-709	Styrene 100%	10,000 gals	18'	668,300 gals	0.026 lbs/hr	0.115

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154333
Expiration Date: July 31, 1989

Issued this 11th day of July 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154335
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-613 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibrationand maintenance records and all original stripchart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used tocomplete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-613	Butyl Cellosolve (100%)	12,000 gals	21'	824,300 gals	0.003 lbs/hr	0.015

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154335
Expiration Date: July 31, 1989

Issued this 10 day of March, 1989

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154336
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 5,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TT-9 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154336
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss. TPY
TT-9	Butyl Cellosolve (25%) Resin Solids (75%)	5,500 gals	10'	432,000 gals	0.001 lbs/hr 0.005

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154336
Expiration Date: July 31, 1989

SPECIFIC CONDITIONS:

Issued this 6th day of July, 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154337
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-614 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-614	Pamolyn 300 (100%)	12.500 gals	12'	594,900 gals	0.026 lbs/hr	0.0898

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154337
Expiration Date: July 31, 1989

Issued this 10 day of March, 1989

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154339
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-505 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-500	Naptha (25%) Resin Solids (75%)	12,500 gals	22'	1,216,000 gals	0.058 lbs/hr	0.255

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant shall prevent objectionable odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. The company shall conduct compliance verification by periodic visual inspections of the equipment used to store and transfer the product. Records of the inspections shall be maintained for a minimum of two years. These records shall be made available to the Department upon request.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154339
Expiration Date: July 31, 1989

Issued this 10 day of March, 1989

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Dale Twachtmann

for FROM: Steve Smallwood

SUBJ: Reichhold Chemicals, Inc.
Approval of Construction Permit Numbers: AC 17-154330 -154331, -154332, -154333, -154335, -154336 -154337, and -154339

DATE: March 9, 1989

Attached for your approval and signature are eight permits prepared by Central Air Permitting for the above mentioned company to construct eight above ground storage tanks for several volatile organic compounds at their existing facility in Pensacola, Escambia County, Florida.

Day 90, after which these permits will be issued by default, is March 13, 1989.

I recommend your approval and signature.

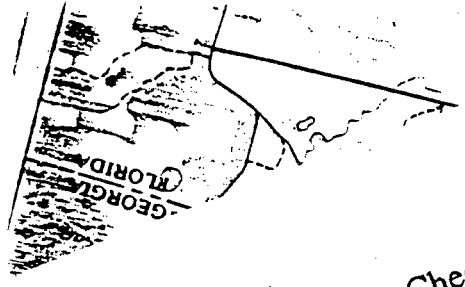
SS/TH/s

attachments

RECEIVED
MAR 9 1989
Office of the Secretary

Please call Patty Adams when signed 8-1344

Thank you.



Check Sheet

ompany Name: Leichhtal Chemicals, Inc
Permit Number: AC 17-154330, -331, -332, -333, -335, -336, -337, -339
PSD Number:
Permit Engineer:

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

Revision #5

VOC V.P greater Than 0.10 mm Hg under S.C.

recovery and return or disposal system in accordance with the requirements of § 60.112a (a)(3) and (b).

Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

SOURCE: 52 FR 11429, Apr. 8, 1987, unless otherwise noted.

§ 60.110b Applicability and designation of affected facility.

(a) Except as provided in paragraphs (b), (c), and (d) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 40 cubic meters (m^3) that is used to store volatile organic liquids (VOL's) for which construction, reconstruction, or modification is commenced after July 23, 1984.

(b) Except as specified in paragraphs (a) and (b) of § 60.116b, storage vessels with design capacity less than 75 m^3 are exempt from the General Provisions (Part 60, Subpart A) and from the provisions of this subpart.

(c) Except as specified in paragraphs (b) and (c) of § 60.116b, vessels either with a capacity greater than or equal to 151 m^3 storing a liquid with a maximum true vapor pressure less than 3.5 kPa or with a capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the General Provisions (Part 60, Subpart A) and from the provisions of this subpart.

(d) This subpart does not apply to the following:

(1) Vessels at coke oven by-product plants.

(2) Pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere.

(3) Vessels permanently attached to mobile vehicles such as trucks, railcars, barges, or ships.

(4) Vessels with a design capacity less than or equal to 1,589.874 m^3 used for petroleum or condensate stored, processed, or treated prior to custody transfer.

(5) Vessels located at bulk gasoline plants.

(6) Storage vessels located at gasoline service stations.

(7) Vessels used to store beverage alcohol.

§ 60.111b Definitions.

Terms used in this subpart are defined in the Act, in Subpart A of this part, or in this subpart as follows:

(a) "Bulk gasoline plant" means any gasoline distribution facility that has a gasoline throughput less than or equal to 75,700 liters per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal requirement or Federal, State or local law, and discoverable by the Administrator and any other person.

(b) "Condensate" means hydrocarbon liquid separated from natural gas that condenses due to changes in the temperature or pressure, or both, and remains liquid at standard conditions.

(c) "Custody transfer" means the transfer of produced petroleum and/or condensate, after processing and/or treatment in the producing operations, from storage vessels or automatic transfer facilities to pipelines or any other forms of transportation.

(d) "Fill" means the introduction of VOL into a storage vessel but not necessarily to complete capacity.

(e) "Gasoline service station" means any site where gasoline is dispensed to motor vehicle fuel tanks from stationary storage tanks.

(f) "Maximum true vapor pressure" means the equilibrium partial pressure exerted by the stored liquid at the temperature equal to the highest calendar-month average of the liquid storage temperature for liquids stored above or below the ambient temperature or at the local maximum monthly average temperature as reported by the National Weather Service for liquids stored at the ambient temperature, as determined:

(1) In accordance with methods described in American Petroleum institute Bulletin 2517, Evaporation Loss

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

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

3. Article Addressed to:

Mr. Michael G. Long
Plant ngineer
Reichhold Chemicals, Inc.
P. O. Box 1433
Pensacola, FL 32596

4. Article Number
P 407 852 908

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

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X Jan V. Young

7. Date of Delivery

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

PS Form **3811**, Apr. 1989 *U.S.G.P.O. 1989-238-815 **DOMESTIC RETURN RECEIPT**

P 407 852 908

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

Sent to Mr. Michael G. Long, Reichhol Chem.	
Street and No. P. O. Box 1433	
P.O., State and ZIP Code Pensacola, FL 32596	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 12-28-90 Permit: AC 17-154330 thru -154337	

PS Form 3800, June 1985 *U.S.G.P.O. 1989-234-555

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

December 20, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael G. Long, Plant Engineer
Reichhold Chemicals, Inc.
Post Office Box 1433
Pensacola, Florida 32596

Dear Mr. Long:

Re: Amendment of Air Construction Permits for Reichhold Chemicals
AC 17-154330 Storage Tank TK-806
AC 17-154331 Storage Tank TK-500
AC 17-154332 Storage Tank TK-504
AC 17-154333 Storage Tank TK-709
AC 17-154335 Storage Tank TK-613
AC 17-154336 Storage Tank TT-9
AC 17-154337 Storage Tank TK-500

The Department is in receipt of your letter dated October 18, 1990, which requested a modification to the above referenced permits in order to show actual installed vessel volume, identification number, and NSPS applicability for each installation. The Department has reviewed your proposal and has determined to modify the permits as proposed. There is no increase in the quantity of emissions as a result of this modification.

Specific Condition No. 5 will be deleted for all permits except for permit No. AC 17-154331.

Specific Condition No. 1 will be changed as follows:

AC 17-154330

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	TPY
TK-806	Methacyclic Acid 100%	10,000 gals	18'	208,500 gals	0.005	0.024

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
710	Methacyclic	10,000 gals	18'	208,500 gals	0.005	0.024

AC 17-154331

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-500	Butyl Cello-solve (25%) Resin Solids (75%)	24,000 gals	24'	1,296,000 gals	0.0004	0.0002

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-701	Butyl Cello-solve (25%) Resin Solids (75%)	16,000 gals	24'	1,296,000 gals	0.0004	0.0002

AC 17-154332

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-504	Naptha (25%) Resin Solids (75%)	12,500 gals	22'	524,500 gals	0.059	0.259

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-504	Naptha (25%) Resin Solids (75%)	8,000 gals	22'	524,500 gals	0.059	0.259

AC 17-154333

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	TPY
TK-709	Styrene 100%	10,000 gals	18'	668,300 gals	0.026	0.115

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	TPY
TK-715	Styrene 100%	10,000 gals	18'	668,300 gals	0.026	0.115

AC 17-154335

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	TPY
TK-61	Butyl Cellosolve (100%)	12,000 gals	21'	824,300 gals	0.003	0.015

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	TPY
TK-613	Butyl Cellosolve (100%)	10,000 gals	21'	824,300 gals	0.003	0.015

AC 17-154336

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	TPY
TT-9	Butyl Cellosolve (25%) Resin Solids (100%)	5,500 gals	10'	432,000 gals	0.001	0.005

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TT-11	Butyl Cellosolve (25%) Resin Solids (100%)	5,500 gals	10'	432,000 gals	0.001	0.005

AC 17-154337

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-614	Pamolyn 300 (100%)	12.500 gals	12'	594,900 gals	0.026	0.0898

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-612	Pamolyn 300 (100%)	10,000 gals	12'	594,900 gals	0.026	0.0898

AC 17-154339

FROM:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-500	Naptha (25%) Resin Solids (75%)	12,500 gals	22'	1,216,000 gals	0.058	0.255

TO:

Tank I.D.	Product Storage	Tank Vol.	Tank Height	Annual Usage	VOC Emissions lb/hr	VOC Emissions TPY
TK-500	Naptha (25%) Resin Solids (75%)	8,000 gals	22'	1,216,000 gals	0.058	0.255

Attachment to be Incorporated:
- Mr. Michael G. Long's letter dated October 18, 1990.

This letter must be attached to your construction permits, and shall become a part of the permits.

Sincerely,

STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/TH/plm

c: E. Middleswart, NW Dist.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee			
To:		Location:	
To:		Location:	
To:		Location:	
From:		Date:	

Interoffice Memorandum

TO: Steve Smallwood

FROM: Clair Fancy

DATE: December 20, 1990

SUBJ: Amendment of Air Construction Permits for Reichhold Chemicals

AC 17-154330 Storage Tank TK-806
AC 17-154331 Storage Tank TK-500
AC 17-154332 Storage Tank TK-504
AC 17-154333 Storage Tank TK-709
AC 17-154335 Storage Tank TK-613
AC 17-154336 Storage Tank TT-9
AC 17-154337 Storage Tank TK-500

Attached for your approval and signature is a letter amending the above referenced construction permits.

The Bureau recommends approval of this amendment.

CF/TH/plm

Attachment

ok/fe

Clair

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

REICHHOLD

CERTIFIED MAIL

October 18, 1990

Mr. Steve Smallwood, P.E.
Director
Division of Air Resource Management
Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, FL 32399-2410

Dear Mr. Smallwood,

Construction permit applications for eight new storage tanks at Reichhold Chemical's Pensacola Plant were submitted before actual tank volumes were known. In a meeting held with the local office of the DER on September 14, 1990, Jack Preece recommended that the construction permits for the eight storage tanks (AC 17-154330 - AC 17-1533, AC 17-154335 - AC 17-154337, and AC 17-154339) be amended to show actual installed vessel volume, identification no., and NSPS applicability for each installation. This request could not be submitted until Reichhold received the construction permits extension.

Enclosed is a table indicating the construction permit no., the orginal permitted identification no., vessel volumes,and the NSPS applicability for each tank. The modification to the construction permit is necessary because operating permits are written from the construction permits. While the current construction permits indicate NSPS applies to the new tanks, because smaller tanks were installed, only one of the new tanks (AC 17-154331) is subject to any of the NSPS standards (only 40 CFR 60.116b(b) applies). We request this be reflected in the amended construction permits.

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

Because of the construction permits expiration on November 1, 1990, Carolyn Salmon (DER - Pensacola) recommended that Reichhold Chemicals, Inc., submit permit applications for the operating permits at the local office.

Sincerely,

Michael G. Long
Plant Engineer

MGL/kc

Attachments
1) table summarizing amendments request

cc: Brad Crawford - RCI
Carolyn Salmon - DER
Jack Preece - DER

J. Heaton
C11F/13 A

STORGE TANK AMENDMENT TABLE

PERMIT NO.	MATERIAL STORED	ORIGINAL TANK NO.	ORIGINAL TANK VOLUME GAL.	FINAL TANK NO.	FINAL TANK VOLUME GAL.	NSPS REGULATION
AC17-154330	METHACRYIC ACID	TK-806	10000	TK-710	10000	N/A
AC17-154331	25% BUTYL CELLOSOLVE 75% RESIN	TK-500	24000	TK-701	16000	40 CFR 60.116b(b)
AC17-154332	25% NAPTHA 75% RESIN	TK-504	12500	TK-504	8000	N/A
AC17-154333	STYRENE	TK-709	10000	TK-715	10000	N/A
AC17-154335	BUTYL CELLOSOLVE	TK-613	12000	TK-611	10000	N/A
AC17-154336	25% BUTYL CELLOSOLVE 75% RESIN	TT-9	5500	TT-11	5500	N/A
AC17-154337	PAMOLYN 300	TK-614	12500	TK-612	10000	N/A
AC17-154339	25% NAPTHA 75% RESIN	TK-505	12500	TK-500	8000	N/A

1/25 pg 7C

CE LEGAL NOT

idder (476-5110). ECUA
North serves the right to r
imbia any or all bids
enter re-advertise.
imbia
ween Legal No. 35529 1T
a.m Jan. 25, 1989
D-13,
-Re-
set
final

LEGAL
ADVERTISEMENT

Escambia County Utilities Authority will receive bids to be opened at 2:00 p.m., 9 February 1989, for Refractory for Furnace, MSWWTP 88-13. Specifications and information may be obtained from ECUA, Purchase Agent (476-5110). ECUA reserves the right to reject any or all bids and re-advertise.

Legal No. 35530 1T
Jan. 25, 1989

State of Florida
Department of
Environmental
Regulation
Notice of Issuance

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Riechhold Chemicals, Inc. to construct eight aboveground storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent ot minimize loss of volatile vapors. The tanks will be located at the existing Reichhold CHemical Complex at 407 South Pace Boulevard, Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in teh proceeding. A petitionf or intervention must be filed prusuant 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 Heairngs, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

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

Dept. of Environmental Regulation
Northwest
District Office
160 Governmental
Center
Pensacola, Florida

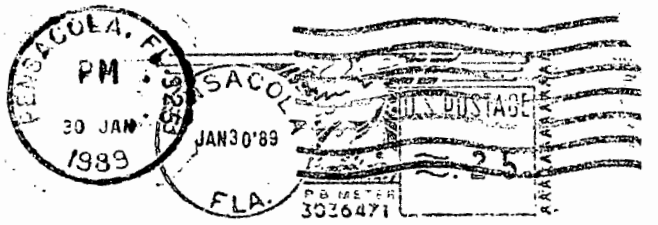
Any person may send written comments on the proposed actlon to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Legal No. 35351 1T
Jan. 25, 1989

REPORT OF CONDITION

AL NOTICE

BOARD OF COUNTY COMMISSIONERS
ESCAMBIA COUNTY, FLORIDA
223 PALAFOX PLACE
P.O. BOX 1591
PENSACOLA, FLORIDA 32597-1591
Pensacola
Florida's First Place City



Mr. Bill Thomas
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

PM
1549
Pensacola, FL

file copy

LETTER OF TRANSMITTAL

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

DATE	JOB NO.
Feb. 14, 1989	77301

ATTENTION: Mr. Clair Fancy

RE: Reichhold Chemicals

RECEIVED
FEB 16 1989
DER - BAQM

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

GENTLEMEN:

WE ARE SENDING YOU ☐ Attached ☐ Under separate cover via _____ the following items:

☐ Shop drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications

☐ Copy of letter ☐ Change order ☐ _____

COPIES	DATE	NO.	DESCRIPTION
1			Notorized Notice of Publication

THESE ARE TRANSMITTED as checked below:

☐ For approval ☐ Approved as submitted ☐ Resubmit _____ copies for approval

☒ For your use ☐ Approved as noted ☐ Submit _____ copies for distribution

☐ As requested ☐ Returned for corrections ☐ Return _____ corrected prints

☐ For review and comment ☐ _____

☐ FOR BIDS DUE _____ 19____ ☐ PRINTS RETURNED AFTER LOAN TO US

REMARKS _____

COPY TO David Bright
cpied: T. Heron
E. Middlewart

SIGNED _____
Daniel B. Smith, P.E.

BD87004-A

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

RECEIVED

FEB 16 1989

DER - 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

Notice of Issuance

in the _____ Court,

was published in said newspaper in the issues of

Jan. 25, 1989

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 1st day of Feb. A.D., 1989

Tracy J. Hudson
NOTARY PUBLIC.

My Commission Expires October 26, 1991

State of Florida
Department of
Environmental
Regulation
Notice of Issuance

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Riechhold Chemicals, Inc. to construct eight aboveground storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent ot minimize loss of volatile vapors. The tanks will be located at the existing Reichhold CHemical Complex at 407 South Pace Boulevard, Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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cc: D. BRIGHT

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

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

Dept. of Environmental Regulation
Northwest
District Office
160 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 14 days of the publication of this notice will be considered in the Department's final determination.

Legal No. 35351 1T
Jan. 25, 1989

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

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

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

3. Article Addressed to:

Mr. Daniel B. Smith, P.E.
Manager, Industrial Dept.
Baskerville-Donovan Engineers
P. O. Box 13370
Pensacola, FL 32591

4. Article Number

P 274 007 559

Type of Service:

☐ Registered ☐ Insured
XX Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Address

X

6. Signature — Agent

X

7. Date of Delivery

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

JAN 24 1989 USPO

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

P 274 007 559

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Daniel B. Smith, Baskervill	
Street and No. P.O. Box 13370 Donovan	
P.O., State and ZIP Code Pensacola, FL 32591	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 1-20-89 Permis: Reichhold 8 Storage Tanks	

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

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

January 19, 1989

Mr. Daniel B. Smith, P.E.
Manager, Industrial Department
Baskerville-Donovan Engineers, Inc.
316 S. Baylen Street, Suite 300
Post Office Box 13370
Pensacola, Florida 32591

Dear Mr. Smith:

RE: AC 17-154330, AC 17-154331, AC 17-154332, AC 17-154333, AC 17-154335, AC 17-154336, AC 17-154337, AC 17-154339
Reichhold Chemicals, Inc.

The Bureau of Air Quality Management received today the Proof of Publication for Reichhold Chemical's proposed permit to construct eight underground storage tanks, and it appears that the second page of the notice was not published in the newspaper. The information on that page includes the availability for public inspection, a requirement of Florida Administrative Code Rules 17-2 and 17-4; therefore, you will need to publish the notice again in its entirety (copy enclosed).

As soon as we receive the proof of publication, we will expedite final action on these permits. If you have any questions, please call Patty Adams at (904)488-1344 or write to me at the above address.

Sincerely,

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

CHF/pa

Enclosure

cc: Philip P. Ulichney, Reichhold Chemicals, Inc.
Ed Middleswart, NW District

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Reichhold Chemicals, Inc. to construct eight above-ground storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent to minimize loss of volatile vapors. The tanks will be located at the existing Reichhold Chemical Complex at 407 South Pace Boulevard, Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

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

Dept. of Environmental Regulation
Northwest District Office
160 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 14 days of the publication of this notice will be considered in the Department's final determination.

LETTER OF TRANSMITTAL

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

RECEIVED
JAN 19 1989
DER - BAQM

DATE	JOB NO.
Jan 18, 1989	77301

ATTENTION: Mr. Clair Fancy

RE: Reichhold Chemicals, Inc.

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

GENTLEMEN:

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via _____ the following items:

☐ Shop drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications

☐ Copy of letter ☐ Change order ☐ _____

COPIES	DATE	NO.	DESCRIPTION
1			Proof of Publication - Permit to Construct Eight above ground storage tanks DER File No. AC 17-154330
			AC 17-154331
			AC 17-154332
			AC 17-154333
			AC 17-154335
			AC 17-154336
			AC 17-154337
			AC 17-154339

THESE ARE TRANSMITTED as checked below:

☐ For approval ☐ Approved as submitted ☐ Resubmit _____ copies for approval

☒ For your use ☐ Approved as noted ☐ Submit _____ copies for distribution

☒ As requested ☐ Returned for corrections ☐ Return _____ corrected prints

☐ For review and comment ☐ _____

☐ FOR BIDS DUE _____ 19 _____ ☐ PRINTS RETURNED AFTER LOAN TO US

REMARKS _____

COPY TO _____

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

BD87004-A

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

PENSACOLA
News Journal

RECEIVED
JAN 19 1989
DER - BAQM

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

D.E.R.

in the Court,

was published in said newspaper in the issues of

Dec. 7, 1988

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

J. Diane Deal

Sworn to and subscribed before me this 8th **day of** Dec **A.D., 19** 88

Patty J. Pinton
NOTARY PUBLIC.

My Commission Expires October 26, 1991

State of Florida
Department of
Environmental
Regulation
Notice of Issuance

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Riechhold Chemicals, Inc. to construct eight above-ground storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent to minimize loss of volatile vapors. The tanks will be located at the existing Reichhold Chemical Complex at 407 South Pace Boulevard, Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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Legal No. 35351 1T
Dec. 7, 1988.

BOARD OF COUNTY COMMISSIONERS
ESCAMBIA COUNTY, FLORIDA
223 PALAFOX PLACE
P.O. BOX 1591
PENSACOLA, FLORIDA 32597-1591
TEL. (904) 436-5783
(SUNCOM) 682-5783
TELEFAX (904) 436-5813

WAYNE PEACOCK
COUNTY ADMINISTRATOR

January 26, 1989

Mr. Bill Thomas
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas

A number of citizens have contacted my office regarding their concerns about the issuance of permits to Reichhold Chemical, Inc. to construct eight (8) above ground storage tanks for volatile organic compounds. It would be most helpful in responding to these concerns if the Department of Environmental Regulation would hold a public hearing to allow local citizens to obtain more information regarding these tanks and the compounds which will be stored in them.

You favorable consideration of this request would be most appreciated.

Sincerely,

Kenneth J. Kelson
Commissioner
District 2

KJK:BK:ddl

Teresa - FYI 2-1-89
Bill Thomas called Mr. Kelson. He will go to NW Dist. office & look at package. He thinks he may be able to get enough information to answer questions Hearing may not be necessary. Will call Bill back if needed.
PA

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

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

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

3. Article Addressed to:

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

4. Article Number

P 274 007 523

Type of Service:

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Address

X

6. Signature — Agent

X Barbara A. Rogers

7. Date of Delivery

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

PENSACOLA FL DEC 1 1988 32590

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

P 274 007 523

RECEIPT FOR CERTIFIED MAIL

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

Sent to Mr. Philip P. Ulichney,	
Street and No. Reichhold Chem. P.O. Box 1433	
P.O., State and ZIP Code Pensacola, FL 32596	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 11-30-88 Permit: AC 17-154330 thru 33 -154335, -6, -7, -9	

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Florida Department of Environmental Regulation
Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

November 23, 1988

CERTIFIED MAIL-RETURN RECEIPT REQJESTED

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

Dear Mr. Ulichney:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Reichhold Chemicals, Inc., to construct eight above-ground storage tanks to be located at the Reichhold Chemical complex in Pensacola, Escambia County, Florida.

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

Sincerely,

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

CHF/ks

Attachments

cc: E. Middleswart, N.W. District
D. Smith, P.E., Baskerville-Donovan Engineers

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permits by:

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

DER File Nos. AC 17-154330
AC 17-154331
AC 17-154332
AC 17-154333
AC 17-154335
AC 17-154336
AC 17-154337
AC 17-154339

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed projects 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 September 2, 1988, to the Department of Environmental Regulation for permits to construct eight above-ground storage tanks to be located at the existing Reichhold Chemical Complex in Pensacola, Escambia County, Florida.

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

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

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

P. Ulichney, Reichhold Chemicals, Inc.
D. Smith, P.E., Baskerville-Donovan Engineers, Inc.
E. Middleswart, N.W. District

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

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 11-30-88.

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.

Judy Rogers
Clerk

11-30-88
Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Reichhold Chemicals, Inc. to construct eight above-ground storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent to minimize loss of volatile vapors. The tanks will be located at the existing Reichhold Chemical Complex at 407 South Pace Boulevard, Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

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

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

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

Dept. of Environmental Regulation
Northwest District Office
160 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 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Reichhold Chemicals, Inc.
Above Ground Storage Tank

Permit Numbers:
AC 17-154330
AC 17-154331
AC 17-154332
AC 17-154333
AC 17-154335
AC 17-154336
AC 17-154337
AC 17-154339

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

November 23, 1988

I. NAME AND ADDRESS OF APPLICANT

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

II. REVIEWING AND PROCESS SCHEDULE

Date of Receipt of Application: September 2, 1988.

Completeness Review: September 13, 1988.

Application Completeness Date: September 13, 1988.

III. FACILITY INFORMATION

III.1 Facility Location

The proposed sources are located at 407 South Pace Boulevard in Pensacola, Escambia County, Florida. The latitude and longitude coordinates are 30° 24' 30" North and 87° 14' 40" West.

III.2 Standard Industrial Classification Code (SIC)

This facility is classified as follows:

Major Group No. 28 - Chemicals and Allied Products.

Industry Group No. 282 - Plastics, Materials, and Synthetic Resins, Synthetic Rubbers, Synthetic and other man-made fibers, except glass.

Industry No. 2821 - Plastics.

III.3 Facility Category

Reichhold Chemicals, Inc. is a major facility. Emissions of volatile organic compounds will be increased by approximately 1 ton per year as a result of this project.

IV. PROJECT DESCRIPTION

This project involves the construction of eight (8) above ground, non-pressurized storage tanks for several volatile organic compounds. Each tank will be equipped with a conservative breather vent to minimize loss of volatile vapors.

V. RULE APPLICABILITY

This project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida

Statutes (F.S.) and Chapter 17-2, Florida Administrative Code (F.A.C.).

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

Reichhold Chemicals, Inc. is a major emitting facility for particulate matter and volatile organic compounds as defined in Rule 17-2.100, F.A.C.

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

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

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

The proposed facility shall comply with Rule 17-2.620(1) and (2) General Pollutant Emissions Limiting Standards and 40 CFR 60.110b, Subpart Kb, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification commenced after July 23, 1984.

VI. SOURCE IMPACT ANALYSIS

VI.1 EMISSIONS SUMMARY

The installation of the proposed above ground storage tanks will produce emissions of volatile organic compounds (VOC).

The estimated potential VOC emissions due to the processing of the different raw materials are summarized in Table 1.

These permitted emissions are in compliance with all applicable requirements of Chapter 17-2, F.A.C.

Vl.2 AIR TOXICS INFORMATION

Currently, the department is developing acceptable ambient concentrations for toxic substances. Specifically, sources classified as Category A (carcinogens and highly toxics) and Category B (moderately toxic substances).

In the event toxics emission limits are set during the term of this permit or any subsequent permit which are different than

the permitted emissions, the department may seek modification pursuant to Rule 17-4.08, F.A.C.

VI.3 AIR QUALITY ANALYSIS

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

VII. CONCLUSION

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

Table 1

TANK I.D.	SOLVENT% STORED	TANK VOLUME (gals)	TANK HEIGHT	ANNUAL USAGE (gals)	EMISSIONS lbs/hr	EMISSIONS tons/yr
TK-806	Methacyclic Acid (100%)	10,000	18'	208,500	0.005	0.0235
TK-500	Butyl Cellosolve (25%)	24,000	24'	1,296,000	0.0004	0.0002
TK-504	Naptha (25%)	12,500	22'	524,000	0.059	0.2592
TK-709	Styrene (100%)	10,000	18'	668,300	0.0263	0.1152
TK-613	Butyl Cellosolve (100%)	12,000	21'	824,300	0.0034	0.0147
TT-9	Butyl Cellosolve (25%)	5,500	10'	432,000	0.0010	0.0045
TK-614	Pamolyn 300 (100%)	12,500	22'	594,900	0.0263	0.0898
TK-505	Naptha (25%)	12,500	22'	1,216,000	0.058	0.2548

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154333
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 10,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-709 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154333
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain, at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-709	Styrene (100%)	10,000 gals	18'	668,300 gals	0.026 lbs/hr	0.115

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154333
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154336
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 5,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TT-9 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154336
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TT-9	Butyl Cellosolve (25%)	5,500 gals	10'	432,000 gals	0.001 lbs/hr	0.005

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154336
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154332
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-504 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154332
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-504	Naptha (25%)	12,500 gals	22'	524,000 gals	0.059 lbs/hr	0.259

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154332
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154331
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 24,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-500 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154331
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-500	Butyl Cellosolve (25%)	24,000 gals	24'	1,296,000 gals	0.0004 lbs/hr	0.0002

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154331
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154335
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-613 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154335
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-613	Butyl Cellosolve (100%)	12,000 gals	21'	824,300 gals	0.003 lbs/hr	0.015

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154335
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154337
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-614 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154337
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-614	Pamolyn 300 (100%)	12,500 gals	12'	594,900 gals	0.026 lbs/hr	0.0898

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154337
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154339
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 12,500 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-505 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154339
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-500	Naptha (25%)	12,500 gals	22'	1,216,000 gals	0.058 lbs/hr	0.255

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154339
Expiration Date: July 31, 1989

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154339
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

PERMITTEE:
Reichhold Chemicals, Inc.
P. O. Drawer 1433
Pensacola, FL 32596

Permit Number: AC 17-154330
Expiration Date: July 31, 1989
County: Escambia
Latitude/Longitude: 30° 24' 30"N
87° 14' 40"W
Project: 10,000 Gals Above Ground Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the establishment of a permit for an Above Ground Storage Tank, I.D. Number TK-806 at the applicant's existing chemical complex located at Pensacola, Escambia County, Florida.

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

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1) dated September 2, 1988.

2. Additional information submitted on September 13, 1988.

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154330
Expiration Date: July 31, 1989

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.

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. A description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
(x) 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.

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Expected annual usage and potential VOC emissions shall not exceed:

Tank I.D.	Solvent(%)	Tank Vol.	Tank Height	Annual Usage	VOC Emiss.	TPY
TK-806	Methacyclic Acid (100%)	10,000 gals	18'	208,500 gals	0.005 lbs/hr	0.024

SPECIFIC CONDITIONS:

2. If any spills, leaks, etc. occur, the DER's Northwest District office shall be promptly notified.

3. The applicant must prevent pollutant odors from reaching off-plant property.

4. This source is allowed to operate continuously (8760 hours per year).

5. This source shall comply with all applicable provisions of Subpart Kb, 40 CFR 60, NSPS for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984.

6. Since the VOC emissions from this source are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the product. The visual inspections shall be conducted by the DER's Northwest District office. Any corrective action shall be concurred with the District office.

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

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

PERMITTEE:
Reichhold Chemicals, Inc.

Permit Number: AC 17-154330
Expiration Date: July 31, 1989

Issued this_____day of_____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

_____
Dale Twachtmann, Secretary

ATTACHMENTS AVAILABLE UPON REQUEST

Airbill #975 7459073
11-3-88
Pensacola, FL

file copy

BASKERVILLE-DONOVAN ENGINEERS, INC.
A PROFESSIONAL SERVICE ORGANIZATION
• PENSACOLA • TALLAHASSEE • FORT WALTON BEACH •
MILTON • PORT ST. JOE • PANAMA CITY • APALACHICOLA • DAYTONA BEACH

November 3, 1988 "Federal Express"

Mr. Bill Thomas
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

RECEIVED
NOV 4 1988
DER - BAQM

Re: Reichhold Chemicals, Inc.
Permits to Construct AC 17-154333,
AC 17-154335 thru 7, and AC 17-154339
Our Project Number 77301

Dear Mr. Thomas,

To confirm our conversation of today's date, I wish to request exemptions from the permitting process for the above referenced projects. As we discussed, the projects' emissions do fall under the Reasonably Available Control Technology (RACT) provisions of the administrative code. Specifically, the throughput of the tanks involved in the above referenced applications is less than 20,000 gallons monthly, and therefore exempt under Section 17-2.650(1)(b)1.a. Additionally, all tanks have a capacity less than 42,000 gallons and therefore would be exempt under Section 17-2.650(1)(f)8a.(i).

Based on these interpretations, I request an exemption from your department. I and Reichhold Chemicals greatly appreciate the efforts of you and your staff in assisting us in complying with the applicable standards. We shall hereby commit to proper installation of the tanks, their conservation vents, and assure the integrity of the piping systems. Furthermore, Reichhold Chemicals, Inc., shall maintain the tanks properly and paint as required for corrosion protection.

Please feel free to contact me at 904/438-9661 if you have any questions concerning this request.

Very truly yours,

BASKERVILLE-DONOVAN ENGINEERS, INC.

DANIEL B. SMITH — No. 7501 — STATE OF FLORIDA — REGISTERED ENGINEER — CERTIFICATE — 11/3/88

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

DBS/alk

c - WFB
David Bright, Reichhold Chemical, Inc.

copied: Teresa Heron
Ed Middlesworth
CHF/BT

BEST AVAILABLE COPY

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USE THIS AIRBILL FOR DOMESTIC SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.
USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO.
QUESTIONS? CALL 800-238-5355 TOLL FREE.

PACKAGE TRACKING NUMBER 975745[illegible]

975745[illegible]

975745[illegible]

Date 11/3/88

RECIPIENT'S COPY

1 From (Your Name) Please Print: Daniel B. Smith

Your Phone Number (Very Important): (904) 438-9661

Company: BASKERVILLE-DONOVAN ENG INC

Department/Floor No.:

Street Address: 316 S BAYLEN STE 300

City: PENSACOLA State: FL ZIP Required: 3 2 5 0 1

2 To (Recipient's Name) Please Print: Mr. Bill Thomas

Recipient's Phone Number (Very Important): ( )

Company: Florida Dept of Environmental Reg

Department/Floor No.:

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. ® Zip Codes.): 2600 Blair Stone Road

City: Tallahassee, Florida State: ZIP Required: 3 2 3 0 1

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.): 77301

H IF HOLD FOR PICK-UP, Print FEDEX Address Here
Street Address:
City: State: ZIP Required:

PAYMENT ☒ Bill Sender ☐ Bill Recipient's FedEx Acct. No. ☐ Bill 3rd Party FedEx Acct. No. ☐ Bill Credit Card ☐ Cash

4 SERVICES

1 ☐ PRIORITY 1 Overnight Delivery
2 ☐ COURIER-PAK OVERNIGHT ENVELOPE*
3 ☐ OVERNIGHT BOX
4 ☐ OVERNIGHT TUBE
5 ☐ STANDARD AIR Delivery not later than second business day
6 ☒ OVERNIGHT LETTER*
7 ☐
8 ☐
9 ☐
10 ☐

*Declared Value Limit $100.

DELIVERY AND SPECIAL HANDLING

1 ☐ HOLD FOR PICK-UP (Fill in Box H)
2 ☒ DELIVER WEEKDAY
3 DELIVER SATURDAY (Extra charge) ☐
4 ☐ DANGEROUS GOODS (Extra charge)
5 ☐ CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Release Signature Not Applicable)
6 ☐ DRY ICE _____ Lbs.
7 ☐ OTHER SPECIAL SERVICE _____
8 ☐
9 ☐ SATURDAY PICK-UP (Extra charge)
10 ☐
11 ☐
12 ☐ HOLIDAY DELIVERY (If offered) (Extra charge)

PACKAGES	WEIGHT	YOUR DECLARED VALUE	OVER SIZE
	LBS		
	LBS		
	LBS		
	LBS		
Total	Total	Total	

Received At
1 ☐ Regular Stop
2 ☐ On-Call Stop
3 ☐ Drop Box
4 ☐ B.S.C.
5 ☐ Station

FEDEX Corp. Employee No.:

5

Date/Time for FEDEX Use:

Emp. No. Date
☐ Cash Received
☐ Return Shipment ☐ Third Party ☐ Chg. To Del. ☐ Chg. To Hold
Street Address
City State Zip
Received By: X
Date/Time Received FedEx Employee Number

Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.

Release Signature:

Federal Express Use
Base Charges
Declared Value Charge
Other 1
Other 2
Total Charges

PART #111800
REVISION DATE 7/88
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009

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

3. Article Addressed to:

Mr. Phillip R. Ulichney
Peichhold Chemicals, Inc.
407 S. Pace Blvd.
Pensacola, FL 32596-1433

4. Article Number
P 274 007 472

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery

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

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

P 274 007 472

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

Sent to Mr. Phillip Ulichney, Reich-Hold Chem.	
Street and No. 407 S. Pace Blvd.	
P.O., State and ZIP Code Pensacola, FL 32596	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: 10-13-88 Permit: AC 17-154333-335 -154337, -39	

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

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

October 11, 1988

Mr. Phillip R. Ulichney, Plant Manager
Reichhold Chemicals, Inc.
407 South Pace Boulevard
Pensacola, Florida 32596-1433

Dear Mr. Ulichney:

Re: Reichhold Chemicals, Inc. Permits to Construct AC 17-154330 through AC 17-154333, AC 17-154335 through AC 17-154337, and AC 17-154339.

The Department is currently reviewing Reichhold Chemicals, Inc.'s applications for permits to construct eight (8) above ground storage tanks. The proposed project involves installation and operation of these new storage tanks.

We acknowledge the fact that the installation of these tanks will not increase the overall emissions of the plant other than the specific working and breathing losses from the tanks and that no new reactors or other production vessels are a part of the construction plan.

In Mr. D. W. Bright's correspondence of September 12, 1988, he requested permission to begin construction prior to permits being issued.

The Department has considered the Company's request and determined that in accordance with Federal and State regulations, a permit to construct needs to be issued prior to the beginning of any construction or modification. Chapter 17-2.100(50) defines construction as follows: "The act of performing on-site fabrication, erection, installation or modification of a source or facility of a permanent nature, including, but not limited to installation of foundations or building supports, laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of a source or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not part of the construction activities."

If you have any questions on our position on this matter, please call Bill Thomas, Chief Engineer, at (904)488-1344. We will try to expedite our review to meet as closely as possible your construction schedule.

Sincerely,

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

CHF/plm

PM
9-12-88
Pensacola FL

file copy

BASKERVILLE-DONOVAN ENGINEERS, INC.

A PROFESSIONAL SERVICE ORGANIZATION

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

September 6, 1988

RECEIVED
SEP 13 1988
DER-BAQM

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

RE: Reichhold Chemicals, Inc.
Permits to Construct
Our Project No. 77301

Dear Mr. Fancy:

On September 2, 1988, Mr. Willard Hanks reviewed eight applications for above-ground storage tanks with Mr. Michael Long, Mr. David Bright, and me. These tanks are planned for installation at Reichhold Chemical, Inc's., Pensacola facility. Mr. Hank's preliminary review of the eight applications found them to be substantially complete. He did request the following information in order to have a more thorough set of documents for these tanks:

1. Material Safety Data Sheets (MSDS) for each solvent. These are attached.

2. Manufacturer's information on the conservation vent to be installed on the tanks. A copy of this data is attached.

3. A summary sheet of the tanks with identification, contents, capacity, color, etc., the I.D. number on the attached sheet may be used by your staff for referencing the tanks.

In addition to the above information, we would like to confirm some design points which are to be incorporated in the installation of these tanks. First, all piping to and from the tanks is closed. Second, the tanks are to be installed within concrete dikes designed to control any accidental loss from the tanks. The dikes are isolated and controlled. Third, the eight new storage tanks are to be used to support new intermediates which Reichhold Chemicals, Inc., will be producing. These products are similar to one which are presently produced at the facility. No new reactors or other production vessels are a part of the construction plan. Therefore, the installation of these tanks will not increase the overall emissions of the plant other than the specific working and breathing losses which are detailed in the tanks' applications for construction.

CERTIFIED

P 743 642 445

MAIL

Return Receipt Required

BASKERVILLE-DONOVAN ENGINEERS, INC.

316 SOUTH BAYLEN ST., SUITE 300
PENSACOLA, FL 32501
(904) 438-9661

Mr. C.H. Fancy, P.E.
Bureau of Air Quality Mgt.
Twin Towers Office Bdlg.
2600 Blair Stone Rd.
Tallahassee, FL 32399

BASKERVILLE-DONOVAN ENGINEERS, INC.

Mr. Hanks also requested a sample calculation using the AP-42 methods referenced in the application. For the styrene solvent tanks the parameters and calculations are as follows:

Parameters:

M_v = 66.0 (lb/Lb mole)

P_a = 14.74 lb/sq. in. (atm. & vent pressure)

P = 0.27 lb/sq. in. (vapor press.)

D = 10 ft. (tank diameter)

H = 18 ft. (tank height)

ΔT = 17.7 ° F (per National Weather Service, Pensacola)

F_p = 1.2 (paint factor)

C = 0.5

K_c = 1.0 (product factor)

V = 10,000 gallons (volume)

N = 66.83 (number of turnovers/yr)

K_n = .60 (turnover factor)

Equations:

Breathing Loss = $L_b = (0.0226)(66)(0.27/14.74-0.27)^{0.68}(10)^{1.73}(18)^{0.51}(1.20)(0.5)(1.0)$

L_b = 58.8938 LB/YR

Working Loss = $L_w = (0.000024)(66)(0.27)(66.83)(.60)(1.0)(10,000)$

L_w = 171.4911 LB/YR

Other calculations follow this format. The pertinent sections of AP-42 are attached for your reference. We used a conservative paint factor (1.2 vs. 1.0) for the tanks even though the tanks shall be painted white.

BASKERVILLE-DONOVAN ENGINEERS, INC.

This information should facilitate the review of the applications. We appreciate Mr. Hanks time in providing an in-office review. If you have any questions, please feel free to contact me.

Very truly yours,

BASKERVILLE-DONOVAN ENGINEERS, INC.

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

DBS:cat

copied: Teresa Heron
Jack Reese
CHF/BT

TABLE 1

TANK INFORMATION

TANK I.D.	PRODUCT	SOLVENT/%	TANK COLOR	TANK VOLUME (gal)	TANK HEIGHT	ANNUAL USUAGE (GAL)
TT-9	92736	Butyl Cellosolve 25%	White	5,500	10'	432,000
TK-500	92736	Butyl Cellosolve 25%	White	24,000	24'	1,296,000
TK-505	44429	Naptha/25%	White	12,500	22'	1,216,000
TK-504	44427	Naptha/25%	White	12,500	22'	524,000
TK-806	Methacyclic Acid	100%	Aluminum	10,000	18'	208,500
TK-613	Butyl Cellosolve	100%	White	12,000	21'	824,340
TK-614	Pamolyn 300	100%	White	12,500	22'	594,890
TK-709	Styrene	100%	Aluminum	10,000	18'	668,300

PROTECTOSEAL
SAFETY WITHOUT COMPROMISE

Series No. 8540H
Conservation Breather Vent

End-of-Line Conservation Breather Vent

OBJECTIVE
The Protectoseal Series No. 8540H End-of-Line Conservation Breather Vent is intended for use where pressure and vacuum relief is required.

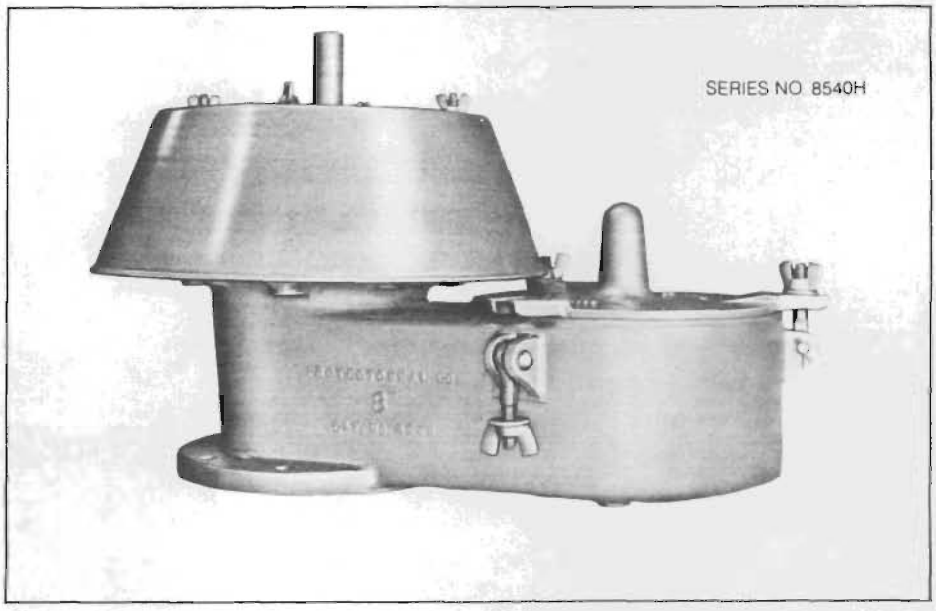
TECHNIQUE
Pallets in the vent housing allow intake of air and escape of vapors as the tank normally breathes in and out. Pallets open and close to permit only that intake or outlet relief necessary to remain within permissible working pressures and avoid damage to tank.

CONSTRUCTION
Standard: Lightweight low Copper content Aluminum housing, Aluminum pallets and Teflon® Air Cushion pallet diaphragms.

Custom: Ductile Iron housing, Stainless Steel pallet assemblies and painted steel weatherhood. Stainless Steel and other special metals or coatings to withstand the corrosive action of some vapors and atmospheric conditions are available on request.

SPECIAL FEATURES
Easy Inspection and Maintenance. Design and light weight of entire unit permits easy, convenient handling for inspection and maintenance.

Maintains Accurate Pressure Settings. Standard Aluminum pallet setting is ½ oz./sq. in. On 316 Stainless units, the standard setting is ¾ oz./sq. in. Units may be pressure loaded for use on blanketed tanks or other installations requiring higher settings.



Automatic Condensate Drainage. Self-draining housing body and drip rings keep condensate away from seating surfaces. Vent is protected from freezing, binding and clogging.

Air-Cushioned Seating. Patented and exclusive Protectoseal Air-Cushion seating for low evaporation losses. Teflon® is standard; rubber or metal-to-metal seating can be furnished on special request. The pallets have peripheral guiding and center stabilizing stem to insure proper alignment and tight seating.

Numerous Sizes Available. All sizes 2-inch thru 12-inch vents mate with standard flanged A.N.S.I. connections. Select the correct size vent to relieve the operating and thermal pressure buildups and provide adequate vacuum relief. Use chart on other side for ordering.

Quality Assurance. Each unit is factory tested for leakage and correct settings to meet Protectoseal's high standards prior to shipment.

MATERIALS OF CONSTRUCTION

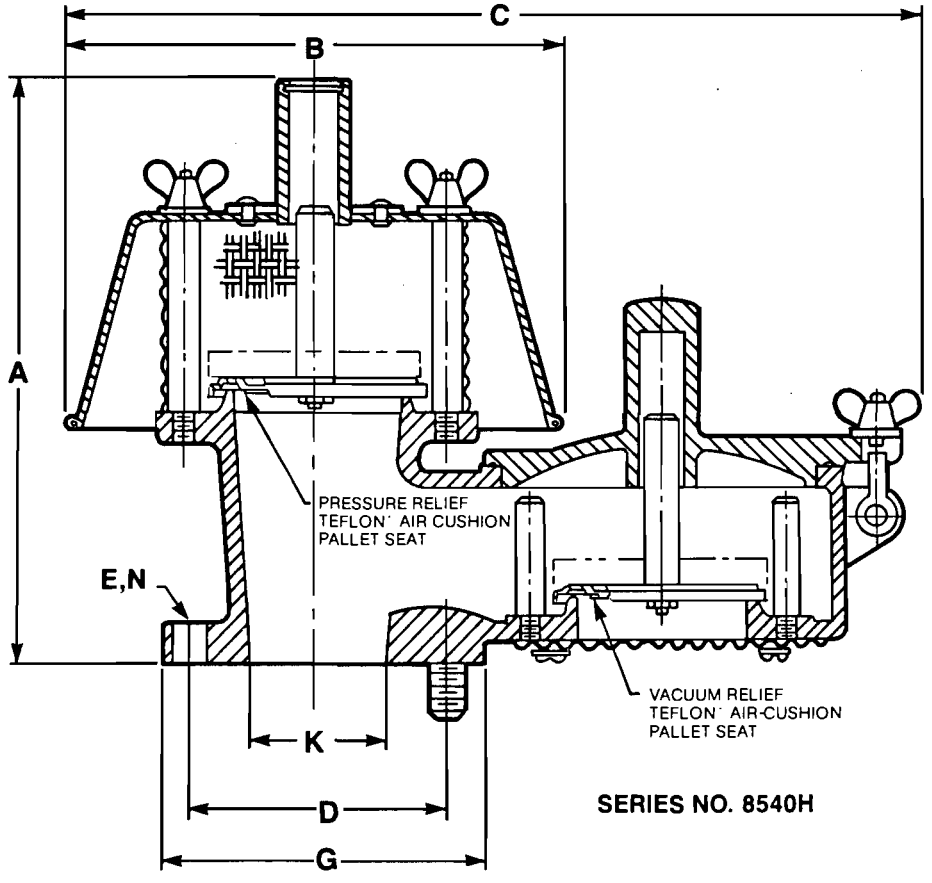
Series	Housing	Pallets*	Pallet Diaphragm
8540H	Aluminum 356	Aluminum	Teflon®
C8540H	Ductile Iron A536	316 Stainless Steel	Teflon®
F8540H	316 Stainless Steel	316 Stainless Steel	Teflon®
RE8540H	Aluminum 356	316 Stainless Steel	Teflon®

*On Ductile Iron and Aluminum vents, weights are Steel or Lead. On Stainless Steel vents, weights are Stainless Steel or Lead. Aluminum flanged to mate with 125# FF A.N.S.I. Ductile Iron and Stainless Steel flanged to mate with 150# RF A.N.S.I.

SPECIFICATIONS

Series No. 8540H
Conservation Breather Vent

SIDE VIEW



SERIES NO. 8540H

DIMENSIONS

Cat. No.	K Pipe Size	A Ht	Standard Construction B Width	C Length	D B.C	G Dia	E Dia	No. N Holes
For Aluminum Housing and Pallets								
8542H	2″	14″	9½″	15½″	4¾″	6″	¾″	4
8543H	3″	16¾″	11½″	17½″	6″	7½″	¾″	4
8544H	4″	18½″	13″	20¼″	7½″	9″	¾″	8
8546H	6″	23⅛″	17″	26½″	9½″	11″	⅞″	8
8548H	8″	25″	19½″	31¼″	11¾″	13½″	⅞″	8
8550H	10″	27″	23¼″	37¼″	14¼″	16″	1″	12
8552H	12″	30½″	25½″	41″	17″	19″	1″	12

Add prefix "C" for Ductile Iron Housing with Stainless Steel pallets.
Add prefix "F" for Stainless Steel Housing and Stainless Steel Pallets.
Add prefix "RE" for Aluminum Housing with Stainless Steel Pallets.

Check with Sales Department for availability and scheduled delivery.

THE PROTECTOSEAL COMPANY
225 Foster Ave., Bensenville, IL 60106-1690
Phone 1-312-595-0800 Telex 28-2549

SAFETY WITHOUT COMPROMISE®

MP5MCX PRINTED IN U.S.A.

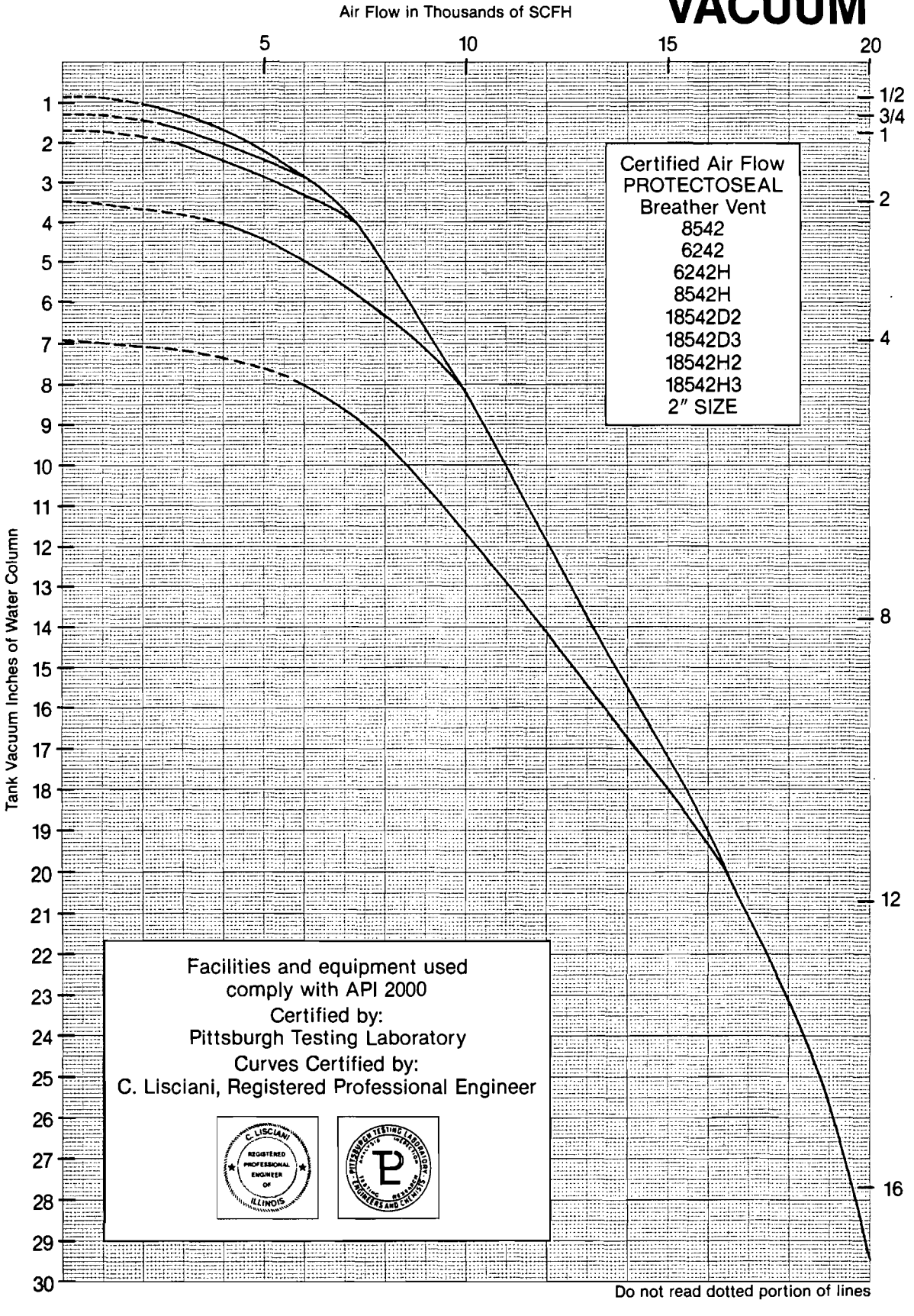
PROTECTOSEAL®
SAFETY WITHOUT COMPROMISE

Series No. 8540

Conservation Breather Vent

Certified Air Flow Curves

VACUUM



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PT2.5MDV PRINTED IN U.S.A.

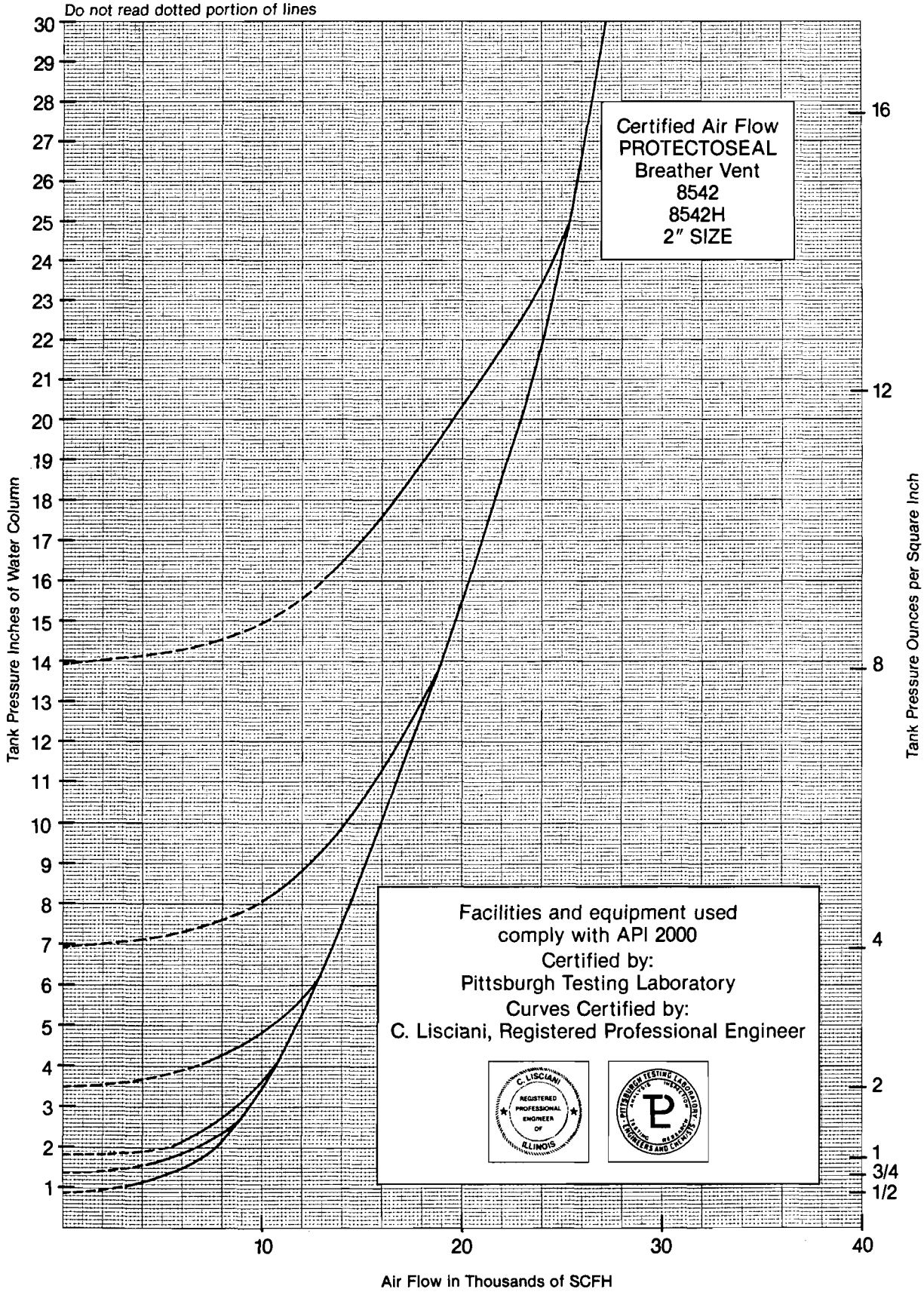
PROTECTOSEAL®
SAFETY WITHOUT COMPROMISE

Series No. 8540

Conservation Breather Vent

Certified Air Flow Curves

PRESSURE



The Protectoseal Company / 225 Foster Avenue, Bensenville, IL 60106-1690 / 1-312-595-0800, Telex: 28-2549

The combined loss from filling and emptying is called working loss. Filling loss comes with an increase of the liquid level in the tank, when the pressure inside the tank exceeds the relief pressure and vapors are expelled from the tank. Emptying loss occurs when air drawn into the tank during liquid removal becomes saturated with organic vapor and expands, thus exceeding the capacity of the vapor space.

The following equations, provided to estimate emissions, are applicable to tanks with vertical cylindrical shells and fixed roofs. These tanks must be substantially liquid and vapor tight and must operate approximately at atmospheric pressure. Fixed roof tank breathing losses can be estimated from[2]:

$$L_B = 2.26 \times 10^{-2} M_V \left(\frac{P}{P_A - P} \right)^{0.68} D^{1.73} H^{0.51} \Delta T^{0.50} F_P C K_C \qquad (1)$$

where:

L_B = fixed roof breathing loss (lb/yr)

M_V = molecular weight of vapor in storage tank (lb/lb mole), see Note 1

P_A = average atmospheric pressure at tank location (psia)

P = true vapor pressure at bulk liquid conditions (psia), see Note 2

D = tank diameter (ft)

H = average vapor space height, including roof volume correction (ft), see Note 3

ΔT = average ambient diurnal temperature change (°F)

F_P = paint factor (dimensionless), see Table 4.3-1

C = adjustment factor for small diameter tanks (dimensionless), see Figure 4.3-4

K_C = product factor (dimensionless), see Note 4

Notes: (1) The molecular weight of the vapor, M_V, can be determined by Table 4.3-2 for selected petroleum liquids and volatile organic liquids or by analysis of vapor samples. Where mixtures of organic liquids are stored in a tank, M_V can be estimated from the liquid composition. As an example of the latter calculation, consider a liquid known to be composed of components A and B with mole fractions in the liquid X_a and X_b, respectively. Given the vapor pressures of the pure

components, P_a and P_b, and the molecular weights of the pure components, M_a^a and M_b^b, M_V is calculated:

$$M_V = M_a \left(\frac{P_a X_a}{P_t} \right) + M_b \left(\frac{P_b X_b}{P_t} \right)$$

where: P_t, by Raoult's law, is:

$$P_t = P_a X_a + P_b X_b$$

(2) True vapor pressures for organic liquids can be determined from Figures 4.3-5 or 4.3-6, or Table 4.3-2. In order to use Figures 4.3-5 or 4.3-6, the stored liquid temperature, T_S, must be determined in degrees Fahrenheit. T_S is determined from Table 4.3-3, given the average annual ambient temperature, T_A, in degrees Fahrenheit. True vapor pressure is the equilibrium partial pressure exerted by a volatile organic liquid, as defined by ASTM-D-2879 or as obtained from standard reference texts. Reid vapor pressure is the absolute vapor pressure of volatile crude oil and volatile nonviscous petroleum liquids, except liquified petroleum gases, as determined by ASTM-D-323.

(3) The vapor space in a cone roof is equal in volume to a cylinder, which has the same base diameter as the cone and is one third the height of the cone. If information is not available, assume H equals one half tank height.

(4) For crude oil, $K_C = 0.65$. For all other organic liquids, $K_C = 1.0$.

Fixed roof tank working losses can be estimated from[2]:

$$L_W = 2.40 \times 10^{-5} M_V P V N K_N K_C \qquad (2)$$

where:

L_W = fixed roof working loss (lb/year)

M_V = molecular weight of vapor in storage tank (lb/lb mole), see Note 1 to Equation 1

P = true vapor pressure at bulk liquid temperature (psia), see Note 2 to Equation 1

V = tank capacity (gal)

N = number of turnovers per year (dimensionless)

$$N = \frac{\text{Total throughput per year (gal)}}{\text{Tank capacity, V (gal)}}$$

SECTION FROM AP-42 SHT. 2/3

K_N = turnover factor (dimensionless), see Figure 4.3-7

K_C = product factor (dimensionless), see Note 1

Note: (1) For crude oil, K_C = 0.84. For all other organic liquids, K_C = 1.0.

TABLE 4.3-3. AVERAGE STORAGE TEMPERATURE (T_S) AS A FUNCTION OF TANK PAINT COLOR[a]

Tank color	Average storage temperature, T_S
White	T_A[b] + 0
Aluminum	T_A + 2.5
Gray	T_A + 3.5
Black	T_A + 5.0

[a] Reference 5.
[b] T_A is the average annual ambient temperature in degrees Fahrenheit.

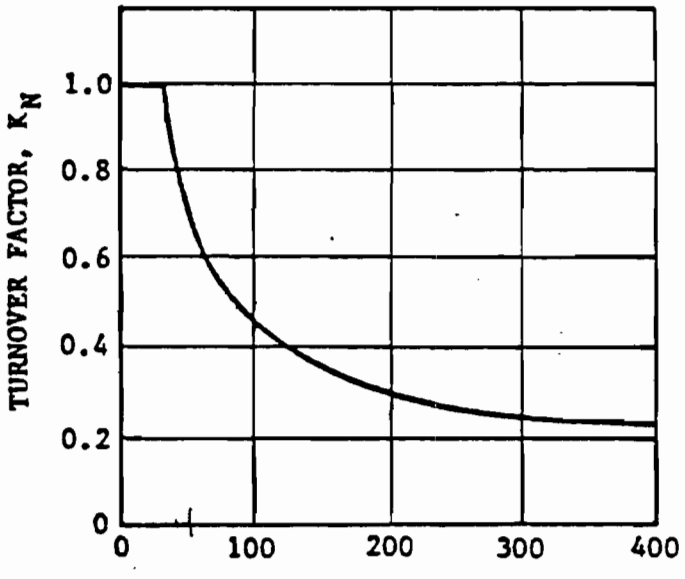


Figure 4.3-7. Turnover factor (K_N) for fixed roof tanks.

005008 GLYCOL ETHER EB PAGE: 1

ACCEPTED BY O.S.H.A. AS ESSENTIALLY SIMILIAR TO O.S.H.A. FORM 20

24-HOUR EMERGENCY TELEPHONE: 606-324-1133 (LOCATED AT ASHLAND, KENTUCKY)

ASHLAND PRODUCT NAME: GLYCOL ETHER EB

REICHHOLD CHEMICALS INC
NEWPORT DIVISION
407 S PACE BLVD
PO BOX 1433
PENSACOLA FLA 32596

05 50 091 7503890-
DATA SHEET NO: 0000694-002
LATEST REVISION DATE: 11/78-78326
PRODUCT: 3070000
INVOICE: 452946
INVOICE DATE: 12/27/83
TO:

ATTN: PURCHASING/SAFETY DEPT.

SECTION I-PRODUCT IDENTIFICATION

GENERAL OR GENERIC ID: GLYCOL ETHER

HAZARD CLASSIFICATION: (10) COMBUSTIBLE (173.115)

SECTION II-HAZARDOUS COMPONENTS

INGREDIENT	PERCENT	PEL	TLV	*
ETHYLENE GLYCOL MONOBUTYL ETHER	>95	50	25 PPM - SKIN	(1)

(1): SKIN ABSORPTION MAY POTENTIALLY CONTRIBUTE TO THE OVERALL EXPOSURE TO THIS MATERIAL. APPROPRIATE MEASURES SHOULD BE TAKEN TO PREVENT ABSORPTION SO THAT THE TLV IS NOT INVALIDATED.

SECTION III-PHYSICAL DATA

PROPERTY	REFINEMENT	MEASUREMENT
INITIAL BOILING POINT	FOR PRODUCT	336.00 - 343.00 DEG F (168.88 - 172.77 DEG C) @ 760.00 MMHG
VAPOR PRESSURE	FOR PRODUCT	< 1.00 MMHG @ 68.00 DEG F (20.00 DEG C)
VAPOR DENSITY	AIR = 1	4.1
SPECIFIC GRAVITY		.901 - .904 @ 68.00 DEG F (20.00 DEG C)
PERCENT VOLATILES		100.00%
EVAPORATION RATE	(N-BUTYL ACETATE = 1)	< 1.00

SECTION IV-FIRE AND EXPLOSION DATA

FLASH POINT(TCC) 140.00 DEG F
(60.00 DEG C)

EXPLOSIVE LIMIT (PRODUCT) LOWER - 1.1%

EXTINGUISHING MEDIA: ALCOHOL FOAM OR WATER FOG OR CARBON DIOXIDE OR DRY CHEMICAL

HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS:, CARBON DIOXIDE AND CARBON MONOXIDE, VARIOUS HYDROCARBONS, ETC.

SPECIAL FIREFIGHTING PROCEDURES: SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN PRESSURE-DEMAND OR OTHER POSITIVE PRESSURE MODE.

UNUSUAL FIRE & EXPLOSION HAZARDS: VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND OR BE MOVED BY VENTILATION AND IGNITED BY HEAT, PILOT LIGHTS, OTHER FLAMES AND IGNITION SOURCES AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT.
NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY.

SECTION V-HEALTH HAZARD DATA

PERMISSIBLE EXPOSURE LEVEL 50 PPM - SKIN

THRESHOLD LIMIT VALUE 25 PPM - SKIN

EFFECTS OF OVEREXPOSURE: FOR PRODUCT

EYES - CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, BLURRED VISION.
SKIN - PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING, DERMATITIS.
CAN BE ABSORBED IN TOXIC AMOUNTS, ESPECIALLY FROM PROLONGED OR REPEATED EXPOSURE.
BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE, POSSIBLE UNCONSCIOUSNESS, AND EVEN ASPHYXIATION.
SWALLOWING - CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND DIARRHEA.

CONTINUED ON PAGE: 2

SECTION V-HEALTH HAZARD DATA (CONTINUED)

FIRST AID:

IF ON SKIN: THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING. LAUNDER CONTAMINATED CLOTHING BEFORE RE-USE.

IF IN EYES: FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

IF SWALLOWED: GIVE TWO GLASSES OF WATER, INDUCE VOMITING IMMEDIATELY BY STICKING FINGER DOWN THROAT. CALL A PHYSICIAN. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

IF BREATHED: IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET AND GET MEDICAL ATTENTION.

SECTION VI-REACTIVITY DATA

HAZARDOUS POLYMERIZATION: CANNOT OCCUR

STABILITY: STABLE

INCOMPATABILITY: AVOID CONTACT WITH:, STRONG OXIDIZING AGENTS.

SECTION VII-SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

SMALL SPILL: ABSORB LIQUID ON PAPER, VERMICULITE, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND TRANSFER TO HOOD.
ELIMINATE ALL SOURCES OF IGNITION SUCH AS FLARES, FLAMES (INCLUDING PILOT LIGHTS), AND ELECTRICAL SPARKS.

LARGE SPILL: ELIMINATE ALL IGNITION SOURCES (FLARES, FLAMES INCLUDING PILOT LIGHTS, ELECTRICAL SPARKS). PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED. STOP SPILL AT SOURCE, DIKE AREA OF SPILL TO PREVENT SPREADING, PUMP LIQUID TO SALVAGE TANK. REMAINING LIQUID MAY BE TAKEN UP ON SAND, CLAY, EARTH, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND SHOVELED INTO CONTAINERS.

WASTE DISPOSAL METHOD:

SMALL SPILL: FLUSH DOWN DRAIN WITH LARGE AMOUNTS OF WATER IN ACCORDANCE WITH APPLICABLE REGULATIONS.

LARGE SPILL: DESTROY BY LIQUID INCINERATION.
CONTAMINATED ABSORBENT MAY BE DEPOSITED IN A LANDFILL IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS.

SECTION VIII-PROTECTIVE EQUIPMENT TO BE USED

RESPIRATORY PROTECTION: IF TLV OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NIOSH/MSHA JOINTLY APPROVED AIR SUPPLIED RESPIRATOR IS ADVISED IN ABSENCE OF PROPER ENVIRONMENTAL CONTROL. OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MSHA RESPIRATORS UNDER SPECIFIED CONDITIONS. (SEE YOUR SAFETY EQUIPMENT SUPPLIER). ENGINEERING OR ADMINISTRATIVE CONTROLS SHOULD BE IMPLEMENTED TO REDUCE EXPOSURE.

VENTILATION: PROVIDE SUFFICIENT MECHANICAL (GENERAL AND/OR LOCAL EXHAUST) VENTILATION TO MAINTAIN EXPOSURE BELOW TLV(S).

PROTECTIVE GLOVES: WEAR RESISTANT GLOVES SUCH AS:, NEOPRENE

EYE PROTECTION: CHEMICAL SPLASH GOGGLES IN COMPLIANCE WITH OSHA REGULATIONS ARE ADVISED; HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER TYPE SAFETY GLASSES. (CONSULT YOUR SAFETY EQUIPMENT SUPPLIER)

OTHER PROTECTIVE EQUIPMENT: TO PREVENT REPEATED OR PROLONGED SKIN CONTACT, WEAR IMPERVIOUS CLOTHING AND BOOTS.

SECTION IX-SPECIAL PRECAUTIONS OR OTHER COMMENTS

CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED. SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THE DATA SHEET MUST BE OBSERVED.

OVEREXPOSURE TO COMPONENTS HAS APPARENTLY BEEN FOUND TO CAUSE THE FOLLOWING EFFECTS IN LABORATORY ANIMALS:, ANEMIA, LIVER ABNORMALITIES, KIDNEY DAMAGE, LUNG DAMAGE, BLOOD ABNORMALITIES

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE BUT IS NOT WARRANTED TO BE WHETHER ORIGINATING WITH ASHLAND OR NOT. RECIPIENTS ARE ADVISED TO CONFIRM IN ADVANCE OF NEED THAT THE INFORMATION IS CURRENT, APPLICABLE, AND SUITABLE TO THEIR CIRCUMSTANCES.

 LAST PAGE--SEE ATTACHMENT PAGE ENCLOSED--LAST PAGE

HERCULES INCORPORATED
Hercules Plaza
Wilmington, Delaware, 19894

MATERIAL SAFETY DATA SHEET

MSDS No.: 676 4033 0000-1
Date: 11/01/85

Phone Number: (302) 594-5000 (all hours)

I. PRODUCT IDENTIFICATION

CAUTION! MAY CAUSE SKIN AND EYE IRRITATION.

PAMOLYN® 300, 300M, 327B, 347 Linoleic acid

HMIS	Rating
Health hazard:	1 Slight
Flammability hazard:	1 Slight
Reactivity hazard:	1 Slight

Chemical and Common Name: Octadecadienoic acid

Blends of fatty acid, dimer fatty acids and conjugated fatty acids.

Appearance and odor: Pale amber, oily liquid; mild, fatty odor

II. HAZARDOUS INGREDIENTS & EXPOSURE LIMITS

Note: The ingredients in this product are not listed in 29CFR1910 Subpart Z nor do they appear in "Threshold Limit Values for Chemical Substances in the Work Environment Adopted by ACGIH for 1985-86".

III. TYPICAL PHYSICAL & CHEMICAL CHARACTERISTICS

Boiling point:	> 350°C (662°F)	Solubility in water:	Slight
Vapor pressure @ 20°C:	< 1 mm Hg	Specific gravity:	0.90
Vapor density:	Nonvolatile	pH:	N/A
% volatile (vol.):	Nonvolatile	Evaporation rate:	Nonvolatile
Freezing point:	< 0°C (32°F)		

IV. FIRE, EXPLOSION, & REACTIVITY HAZARD DATA

Flash point: > 149°C (300°F) TCC

Flammable limits: N/A

Autoignition temperature: 315-371°C (600-700°F)

Extinguishing media: Water spray, dry chemical, foam, or carbon dioxide

Special fire-fighting procedures: N/A

Unusual fire & explosion hazards: N/A

Continued...

N/A - not applicable

IV. FIRE, EXPLOSION, & REACTIVITY HAZARD DATA

...Continued

Stability considerations: Stable. Conditions to avoid: Spontaneous heating may occur in such items as rags, insulation, and trash soaked with this material and exposed to air.

Incompatibility with: N/A

Hazardous products of combustion: Carbon monoxide and carbon dioxide. Depending on conditions, some aliphatic aldehydes and carboxylic acids also may be formed.

Hazardous polymerization: Will not occur.

V. HEALTH HAZARD DATA

CAUTION! MAY CAUSE SKIN AND EYE IRRITATION.

Signs & symptoms of overexposure in the workplace:
Eyes: May cause eye irritation.
Skin: May cause skin irritation.
Ingestion: None known.

EMERGENCY & FIRST AID PROCEDURES:

EYES: In case of contact, immediately flush with plenty of low pressure water for at least 15 minutes. Remove any contact lenses to ensure thorough flushing. Call a physician.

SKIN: Wash with soap and running water.

INGESTION: If swallowed, do NOT induce vomiting. Call a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

Medical conditions generally recognized as being aggravated by exposure: Not known.

Primary Routes of Entry: Eyes, Skin, Ingestion

Not listed as a carcinogen by NTP (National Toxicology Program); not regulated as a carcinogen by OSHA (Occupational Safety & Health Administration); not evaluated by IARC (International Agency for Research on Cancer).

Reported Human Effects: None known.

Reported Animal Effects: None known.

VI. SPILL & LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED: Scrape up and salvage in metal containers. Soak up small spills with earth or sand. Wash area with detergent and water.

Waste Disposal Method: Incineration in accordance with local, state, and Federal regulations.

This product is not listed in federal hazardous waste regulations 40CFR261.33 paragraphs (e) or (f), i.e. chemical products that are considered hazardous if they become wastes. It does not exhibit any of the hazardous characteristics listed in 40CFR261 Subpart C. State or local hazardous waste regulations may apply if different from the federal.

VII. APPLICABLE CONTROL MEASURES

Appropriate hygienic practices:	Avoid contact with eyes, skin, and clothing. Wash thoroughly after handling, and before eating, drinking or smoking.
Personal protective equipment:	Impervious gloves Safety glasses
Work practices:	Eyewash fountains and safety showers should be easily accessible.
Handling and storage precautions:	Discard properly such items as rags, insulation, and trash soaked with this material and exposed to air, as spontaneous heating may occur.
Engineering controls:	Provide adequate ventilation.

fnc 1237s

MATERIAL SAFETY DATA SHEET
DUPONT FABRICATED PRODUCTS DEPARTMENT

SECTION I- IDENTIFICATION

MANUFACTURER: E.I. DUPONT DE NEMOURS &CO., (INC).
FABRICATED PRODUCTS DEPT.
WILMINGTON, DELAWARE 19898

TELEPHONE: PRODUCT INFORMATION: (800)441-7515
MEDICAL EMERGENCY (800) 441-3637
TRANSPORTATION EMERGENCY (800) 424-9300 (CHEMTREC)

PRODUCT: METHACRYLIC ACID

DOT NAME: CORROSIVE LIQUID, N.O.S. UN1760

HMIS: H=3, F=2, R=2

SECTION II - INGREDIENTS

Ingred#	CAS No.	Ingredient
001	79-41-4	METHACRYLIC ACID(2-PROPENOIC ACID, 2-METHYL)

Ingred#	Vapor Pressure	Exposure Limits	
001	1mm(20C)	DUPONT	20.0 PPM
		OSHA	NONE

SECTION III - PHYSICAL DATA

EVAPORATION RATE:
(BuAc=1) 0.07

VAPOR DENSITY:
2.97 @ 60F

SOLUBILITY IN H_2O
INFINITE

PERCENT VOLATILE BY VOLUME
100.0

APPROX. BOILING RANGE
322 F@760mm

DENSITY
1.020gr./cc.

PERCENT VOLATILE BY WEIGHT
100.0

FREEZING POINT
61F

SECTION IV - FIRE & EXPLOSION DATA

FLASH POINT (METHOD):
154 F (TCC)

APPROX. FLAMMABLE LIMITS:
1.6 - 8.8%

EXTINGUISHING MEDIA:
FOAM , CARBON DIOXIDE, DRY CHEMICAL, WATER FOG.

SECTION IV - CONT'D

SPECIAL FIRE FIGHTING PROCEDURES:
FULL PROTECTIVE EQUIPMENT, INCLUDING SELF-CONTAINED BREATHING APPARATUS, IS RECOMMENDED. WATER FROM FOG NOZZLES MAY USED TO PREVENT PRESSURE BUILD-UP.FIGHT FIRES FROM A SAFE DISTANCE OR PROTECTED AREAS.

UNUSUAL FIRE & EXPLOSION HAZARDS:
SEALED CONTAINERS EXPOSED TO ELEVATED TEMPERATURES MAY RUPTURE EXPLOSIVELY DUE TO POLYMERIZATION. VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL TO IGNITION SOURCE.

SECTION V - HEALTH HAZARD DATA

ROUTE OF ENTRY **SYMPTOMS/EFFECTS AND FIRST AID**

INHALATION: MAY CAUSE EYE, NOSE THROAT AND RESPIRATORY IRRITATION.

SKIN OR EYE CONTACT: CORROSIVE TO THE SKIN AND EYE. MAY CAUSE PERMANENT EYE INJURY. MAY CAUSE SKIN SENSITIZATION.

FIRST AID:

INHALATION: IF AFFECTED BY INHALATION OF VAPOR OR SPRAY MIST, REMOVE TO FRESH AIR. IF HAVING BREATHING DIFFICULTY, ADMINISTER OXYGEN. IF NOT BREATHING, GIVE ARTIFICIAL RESPIRATION. IF BREATHING DIFFICULTY PERSISTS, OR OCCURS LATER, CONSULT A PHYSICIAN.

SKIN OR EYE:IN CASE OF CONTACT, IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES; CALL A PHYSICIAN. IN CASE OF SKIN CONTACT, WASH WITH SOAP AND WATER. IF IRRITATION OCCURS, CONTACT A PHYSICIAN.

INGESTION: GET PROMPT MEDICAL ATTENTION. DRINK PLENTY OF WATER. SLEIGHT TOXIC BUT IS CORROSIVE TO TISSUE.

SECTION VI - REACTIVITY DATA

STABILITY : STABLE

CONDITIONS TO AVOID: HEAT AND IGNITION SOURCES; PRODUCT IS STRONGLY ACIDIC- AVOID CONTACT WITH MILD STEEL OR ALKALIS.

INCOMPATIBILITY (MATERIALS TO AVOID): REDUCING AND OXIDIZING AGENTS. MATERIAL HAS STRONG SOLVENT PROPERTIES AND CAN SOFTEN PAINT OR RUBBER

HAZARDOUS DECOMPOSITION PRODUCTS: CO, CO2, SMOKE

HAZARDOUS POLYMERIZATION: CAN OCCUR.
CONDITIONS TO AVOID FOR HAZARDOUS POLYMERIZATION:EXCESSIVE HEAT, STORAGE IN ABSENCE OF INHIBITOR; INADVERTENT ADDITION OF CATALYST. SEE BULLETIN E-53033 FOR DETAILS ON INHIBITORS AND STORAGE STABILITY. AVOID FREEZING THAT MAY RESULT IN UNEVEN DISTRIBUTION OF INHIBITOR. @SECTION HEADR = SECTION VII - SPILL OR LEAK PROCEDURES
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:EVACUATE AREA.VENTILATE AREA. REMOVE SOURCES OF IGNITION. PREVENT SKIN CONTACT AND BREATHING OF VAPOR. CONFINE AND ABSORB WITH DRY SODIUM CARBONATE OR ABSORBANT.

SECTION VII - CONT'D

WASTE DISPOSAL METHOD: EPA CHARACTERISTIC HAZARD WASTE. DO NOT ALLOW MATERIAL TO CONTAMINATE GROUND WATER SYSTEMS. INCINERATE IN A FACILITY WHICH COMPLIES WITH FEDERAL, STATE AND LOCAL REQUIREMENTS. DO NOT INCINERATE IN CLOSED CONTAINERS

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY: DO NOT BREATHE VAPORS OR MISTS. WHEN LEVELS EXCEED 20 PPM, WEAR SELF-CONTAINED BREATHING APPARATUS. FOLLOW THE RESPIRATOR MANUFACTURER'S DIRECTIONS FOR RESPIRATOR USE.

VENTILATION:PROVIDE SUFFICIENT VENTILATION IN VOLUME AND PATTERN TO KEEP CONTAMINANTS BELOW APPLICABLE OSHA REQUIREMENTS AND OTHER SUGGESTED EXPOSURE LIMITS.

PROTECTIVE CLOTHING: NEOPRENE GLOVES,COVERALLS AND BOOTS ARE RECOMMENDED.

EYE PROTECTION: GOGGLES ARE PREFERRED TO PREVENT EYE IRRITATION. IF SAFETY GLASSES ARE SUBSTITUTED, INCLUDE SPLASH GUARD OR SIDE SHIELDS.

PROTECTIVE CREAMS:DO NOT USE FOR PROTECTION. MAY BE USED FOR EASE OF CLEAN UP.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: PRODUCT FREEZES AT 61F,. TO THAW BEFORE USING, DRUMS SHOULD BE PLACED IN A WARM ROOM (AT LEAST 65F) FOR SEVERAL DAYS, AND ROLLED TO MELT AND MIX CONTENTS. AVOID LOCAL OVERHEATING WHICH MIGHT INITIATE UNCONTROLLED POLYMERIZATION. DO NOT USE FLAME OR LIVE STEAM. BE SURE TO VENT DRUMS WHEN EMPTYING. OBSERVE LABEL PRECAUTIONS. KEEP AWAY FROM HEAT, SPARKS,FLAME AND DIRECT SUNLIGHT. CLOSE CONTAINER AFTER EACH USE. GROUND CONTAINERS WHEN POURING. SEE BULLETIN E-53033. WASH THOROUGHLY AFTER HANDLING AND BEFORE EATING OR SMOKING.

OTHER PRECAUTIONS: PERMIT AIR SPACE TO EXIST INSIDE STORAGE CONTAINERS. MATERIAL STORED MORE THAN 3 MONTHS SHOULD HAVE INHIBITOR LEVEL CHECKED AND MAINTAINED AT ORIGINAL LEVEL.

SECTION X - NOTES

NOTICE FROM DUPONT
THE DATA IN THIS MATERIAL SAFETY DATA SHEET RELATE ONLY TO THE SPECIFIC MATERIAL DESIGNATED HEREIN AND DO NOT RELATE TO USE IN COMBINATION WITH ANY OTHER MATERIAL OR ANY PROCESS.
TECHNICAL SERVICES MANAGER

MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

Reichhold Chemicals, Inc.
525 North Broadway, White Plains, N.Y. 10603
INFORMATION TELEPHONE NO:(914) 682-5700

REVISION DATE: 7/85

REICHHOLD®
PERFORMANCE TECHNOLOGY

EMERGENCY PHONE NUMBER • **800-423-3003** (in continental U.S. — except N.Y.) / **800-442-4844** (in N.Y. State)

• These numbers are available days, nights, weekends, and holidays.

Section I — IDENTIFICATION

PRODUCT NAME: 92-718	CHEMICAL NAME OR FAMILY: Synthetic Resin Solution
FORMULA: PROPRIETARY	TRADENAME: Intermediate
DOT SHIPPING NAME: Not Regulated by DOT	DOT HAZARD CLASS: None

Section II — IMPORTANT COMPONENTS

100% Resin Solids	PERMISSABLE EXPOSURE CONCENTRATION: Not Established

Section III — PHYSICAL DATA

BOILING POINT (°F): N/AP	SPECIFIC GRAVITY (H_2O = 1): 0.97
VAPOR PRESSURE (mm Hg.): N/AP	PERCENT VOLATILE BY VOLUME (%): N/AP
VAPOR DENSITY (AIR = 1): Greater than one	EVAPORATION RATE: (Ethyl Ether=1) Less than one
SOLUBILITY IN WATER: Insoluble	
APPEARANCE AND ODOR: Clear liquid, mild odor	

Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: Class 3B

FLASH POINT: >200°F (SFCC)

LEL: N/Ap

EXTINGUISHING MEDIA: Carbon dioxide, dry chemical, foam.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Isolate from heat, electrical equipment, sparks and open flames. Closed containers may rupture when exposed to extreme heat. Rags of waste containing resin that present large air-to-oil-interfaces will oxidize and can ignite spontaneously and should be disposed in a closed metal container.

SPECIAL FIRE FIGHTING PROCEDURES: Treat as an oil fire. Water stream will spread oil fires. Firefighters should wear self-contained breathing apparatus to avoid inhalation of smoke or vapors.

Section V — HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE See Section II

EFFECTS OF OVEREXPOSURE This product is similar to a heavy bodied, non-edible vegetable oil.

EMERGENCY AND FIRST AID PROCEDURES INHALATION: Provide fresh air and rest. SKIN: Wash affected area with soap and water. INGESTION: DO NOT induce vomiting. Drink one or two glasses of water to dilute. See a physician. EYES: Flush with running water for 15 minutes.

Section VI — REACTIVITY DATA

STABILITY ☐ UNSTABLE ☒ STABLE CONDITIONS TO AVOID Warm storage, ignition sources.

INCOMPATIBILITY (*Materials to avoid*) Avoid strong, oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS Smoke, toxic vapors, fumes.

HAZARDOUS POLYMERIZATION ☐ MAY OCCUR ☒ WILL NOT OCCUR

CONDITIONS TO AVOID

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Ventilate area. Remove all sources of ignition. Spread absorbant material and place in a closed container. Wear protective equipment during cleanup.

WASTE DISPOSAL METHOD Incinerate in an approved incinerator or dispose of in a chemical dump in accordance with local, state and federal regulations. Rags of waste containing resin that present large air-to-oil interfaces will oxidize and can ignite spontaneously and should be disposed of in a closed metal container.

Section VIII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION Should be worn to avoid breathing spray mist or heated vapors.

VENTILATION Local exhaust and general ventilation recommended.

PROTECTIVE GLOVES Chemical resistant plastic or rubber.

EYE PROTECTION Chemical goggles.

OTHER PROTECTIVE EQUIPMENT Safety shower. Eye wash fountain.

Section IX — SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING Avoid prolonged or repeated inhalation of heated vapors or spray mist. Keep away from heat.

OTHER PRECAUTIONS Avoid prolonged or repeated skin contact.

MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

Reichhold Chemicals, Inc.
525 North Broadway, White Plains, N.Y. 10603

INFORMATION TELEPHONE NO:(914) 682-5700

REVISION DATE: 8/85

REICHHOLD®
PERFORMANCE TECHNOLOGY

EMERGENCY PHONE NUMBER • **800-423-3003** (in continental U.S. — except N.Y.) / **800-442-4844** (in N.Y. State) • These numbers are available days, nights, weekends, and holidays.

Section I — IDENTIFICATION

PRODUCT NAME	INTERMEDIATE(R) 92-736	CHEMICAL NAME OR FAMILY	Synthetic Resin Solution
FORMULA	PROPRIETARY	TRADENAME	INTERMEDIATE(R)
DOT SHIPPING NAME	Combustible Liquid, n.o.s. NA 1993	DOT HAZARD CLASS	Combustible Liquid

Section II — IMPORTANT COMPONENTS

	PERMISSABLE EXPOSURE CONCENTRATION
80% Resin Solids	Not Established
20% Ethylene Glycol Monobutyl Ether	25 ppm (SKIN) (ACGIH)

Section III — PHYSICAL DATA

BOILING POINT (°F)	336-343	SPECIFIC GRAVITY (H_2O = 1)	N/AP
VAPOR PRESSURE (mm Hg.)	0.6 @ 20°C	PERCENT VOLATILE BY VOLUME (%)	N/AP
VAPOR DENSITY (AIR = 1)	Greater than one	EVAPORATION RATE	(Ethyl Ether=1) Less than one
SOLUBILITY IN WATER	Slightly soluble		
APPEARANCE AND ODOR	Liquid, mild sweet odor		

Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: Class 2

FLASH POINT: 140°F (SFCC)

LEL: 1.1%

EXTINGUISHING MEDIA: Carbon dioxide, dry chemical, foam.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Isolate from heat, electrical equipment, sparks and open flames. Closed containers may rupture when exposed to extreme heat.

SPECIAL FIRE FIGHTING PROCEDURES: Firefighters should wear self-contained breathing apparatus to avoid inhalation of smoke or vapors.

Section V — HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: See Section II

EFFECTS OF OVEREXPOSURE: VAPORS: Irritating to eyes, nose and throat. Excess exposure may result in headache, dizziness and nausea. Defatting to skin.

EMERGENCY AND FIRST AID PROCEDURES: INHALATION: Provide fresh air and rest. SKIN: Wash affected area with soap and water. INGESTION: If conscious, induce vomiting. See a physician at once. EYES: Flush with running water for 15 minutes.

Section VI — REACTIVITY DATA

STABILITY ☐ UNSTABLE ☒ STABLE

CONDITIONS TO AVOID: Warm storage, ignition sources.

INCOMPATIBILITY (*Materials to avoid*): Avoid strong, oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS: Smoke, toxic vapors, fumes.

HAZARDOUS POLYMERIZATION ☐ MAY OCCUR ☒ WILL NOT OCCUR

CONDITIONS TO AVOID

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Ventilate area. Remove all sources of ignition. Spread absorbant material and place in a closed container. Wear protective equipment during cleanup.

WASTE DISPOSAL METHOD: Incinerate in an approved incinerator or dispose of in a chemical dump in accordance with local, state and federal regulations.

Section VIII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Should be worn to avoid breathing spray mist, heated vapors or if TLV is exceeded.

VENTILATION: Local exhaust and general ventilation recommended.

PROTECTIVE GLOVES: Chemical resistant plastic or rubber.

EYE PROTECTION: Chemical goggles.

OTHER PROTECTIVE EQUIPMENT: Safety shower. Eye wash fountain.

Section IX — SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Avoid prolonged or repeated inhalation of heated vapors or spray mist. Keep away from heat.

OTHER PRECAUTIONS: Avoid prolonged or repeated skin contact.

SECTION VII - SPILL OR LEAK PROCEDURES (cont.)

-WASTE DISPOSAL METHOD: (cont.)

and containers should be treated as hazardous wastes based on the characteristic of ignitability as defined under federal RCRA regulations (40 CFR 261). Disposal of this material or its container requires compliance with applicable labeling, packaging, and recordkeeping standards. Extreme care should be taken to ensure that it is disposed of only in a facility permitted for disposal of hazardous waste.

For further information, contact your state or local waste agency or the United States Environmental Protection Agency's RCRA hotline (1-800-424-0340).

SECTION VIII - SPECIAL PROTECTION INFORMATION

-RESPIRATORY PROTECTION:

A canister-type respirator must be worn to prevent the inhalation of vapors or spray mists when the TLV or PEL is exceeded.

-VENTILATION:

General ventilation is required during normal use. Local ventilation may be required during certain operations to keep exposure level below the limits listed in Section II of this data sheet.

-PROTECTIVE GLOVES:

Chemical-resistant nitrile, neoprene or rubber gloves required.

-EYE PROTECTION:

Wear face shield or chemical goggles.

-OTHER PROTECTIVE EQUIPMENT:

Wear protective clothing to prevent skin contact. Eye wash station and safety shower should be available.

SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Avoid prolonged or repeated inhalation of heated vapors or spray mists. Keep away from heat or open flame. Avoid prolonged or repeated skin contact.

-OTHER PRECAUTIONS:

None known.

SECTION V - HEALTH HAZARD DATA (cont.)

-EFFECTS OF OVEREXPOSURE: (cont.)

INHALATION: Remove victim to fresh air immediately. If coughing difficult breathing or any other respiratory symptoms develop, seek medical attention at once.

EYES: This material may be an eye irritant.

-FIRST AID:

SKIN: Wash with soap and water immediately.

EYES: Flush with large quantities of water for 15 minutes and seek medical attention.

INGESTION: If ingested DO NOT induce vomiting, keep person warm, quiet, and get medical attention. Aspiration of material into lungs can cause chemical pneumonitis which can be fatal.

-PRIMARY ROUTE(S) OF ENTRY:

Inhalation.

Skin contact.

SECTION VI - REACTIVITY DATA

STABILITY: [ ] Unstable [x] Stable

HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur

-INCOMPATIBILITY:

Avoid contact with strong oxidizing agents.

-CONDITIONS TO AVOID:

Warm storage and ignition sources.

-HAZARDOUS DECOMPOSITION PRODUCTS:

Incomplete combustion can yield carbon monoxide and toxic vapors.

SECTI[illegible] II - SPILL OR LEAK PROCEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Remove all sources of ignition. Ventilate area. Absorb spill with an absorbent material such as sawdust, vermiculite or sand and place material into a closed container. If large spill, dike area to prevent this material from entering water systems or sewers. Wear protective equipment during cleanup.

-WASTE DISPOSAL METHOD:

This material has been tested and found to have a flash point below 140 degrees Fahrenheit. If discarded, this material (cont.)

MATERIAL SAFETY DATA SHEET

Information Telephone No. 904-433-7621

REICHHOLD CHEMICALS, INC.
Chemical Coatings Division
407 South Pace Blvd.
Pensacola, Florida 32596

ALL CHEMICAL EMERGENCIES
1-800-424-9300

DRAFT

 ISSUE DATE: 10/19/87

SECTION I - PRODUCT IDENTIFICATION

Product Code : 44-429 Trade Name: Intermediate
C.A.S. Number: Mixture Product Class: Alkyd Resin

SECTION II - HAZARDOUS INGREDIENTS

Ingredients	CAS #	Weight %	Exposure Limits
VM & P Naphtha	8032-32-4	37.0	500. ppm

SECTION III - PHYSICAL DATA

Boiling Point: 244-287 Deg. F. Vapor Density: Heavier than Air.
Evap. Rate: Faster than n-Butyl Acetate. Specific Grav: 0.92
Percent volatiles: 53 by volume, maximum
Appearance: Clear liquid.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: 1B Flash Point: 45 Deg. F. LEL : 0.9

-EXTINGUISHING MEDIA:

Foam, dry chemical, carbon dioxide or any Class B extinguishing agent. Water may be unsuitable as an extinguishing media, but helpful in keeping adjacent containers cool.

-SPECIAL FIREFIGHTING PROCEDURES:

Firefighters and others exposed to vapors or products of combustion should wear self-contained breathing apparatus.

-UNUSUAL FIRE & EXPLOSION HAZARDS:

Vapors may form an explosive mixture in air. Closed containers may rupture when exposed to extreme heat.

SECTION V - HEALTH HAZARD DATA

-PERMISSIBLE EXPOSURE LEVEL:

OSHA Exposure limit for Petroleum distillates (which includes VM&P Naphtha) is currently 500 ppm (29 CFR 1910.1000 Z-1). ACGIH has established a 300 ppm TLV for VM&P Naphtha.

-EFFECTS OF OVEREXPOSURE:

SKIN: This material may cause defatting and irritation of skin upon prolonged or repeated contact.

(cont.)

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

FEDERAL EXPRESS 761512422 1
CUSTOMER PACKAGE TRACKING NUMBER — PULL UP PURPLE TAB

file copy

REICHHOLD

September 12, 1988

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Reichhold Chemicals recently submitted eight new applications for construction of eight tanks. Reichhold is in the midst of closing our Detroit, Michigan facility by year end. Therefore, we need to be able to operate these tanks by that time. In order to do so, Reichhold is requesting permission to install foundations; erect the tanks; fabricate and install associated piping, pump valves, etc.; and essentially complete the project before the construction permit is issued. We fully understand that this work would be done "at risk", and that no chemical materials would be allowed in the system until permits have been issued. Reichhold will also blank off all lines at the loading end and process end to prevent use of these systems until permits are issued.

Reichhold is looking at the following construction schedule and would appreciate a quick response on this matter.

9/2/88	• Submit construction permits
9/12/88	• Submit letter to FDER requesting "at risk" construction.
9/26/88	• Letter from FDER giving "at risk" construction approval.
10/3/88	• Begin foundation construction
10/17/88	• Install tanks
10/24/88	• Install piping, pumps, valves, etc.

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

12/2/88 • Receive construction permit.
12/5/88 • Make final connections.
12/12/88 • Start-up

Sincerely,

D. W. Bright
Environmental/Safety Manager

DWB/ka

cc: Mr. A. S. Allen, RCI
Mr. R. P. Aston, RCI
~~Mr. Willard Hanks, DER, Tallahassee~~
Mr. M. G. Long, RCI
Mr. E. Middleswart, DER, Pensacola
Mr. Dan Smith, Baskerville-Donovan
Mr. P. P. Ulichney
Teresa Heron
CHF/BT

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

REICHHOLD CHEMICAL COATINGS DIVISION

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PENSACOLA, FL. 32596

CHECK DATE
09 01 88
MO. DAY YR.

DOLLARS	CENTS
******$800	00****

PAY

REICHHOLD CHEMICALS, INC.

TO THE ORDER OF
State of Florida
Department of Environmental Regulation

Alton Sermon

MANUFACTURERS HANOVER, BANK (DELAWARE)

[redacted]

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

§ 9-2-88
Reichhold is sending additional information that was requested during the meeting.

Subcode 05

BEST AVAILABLE COPY

AC 17-154330

#100 pd. 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

RECEIVED
SEP 2 1988
DER-BAQM

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Methacyclic Acid. Tank capacity is 10,000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants? _____

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

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

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		
Methacyclic Acid	Vapors	100.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 10,000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Methacyclic Acid	0.005	0.0235	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

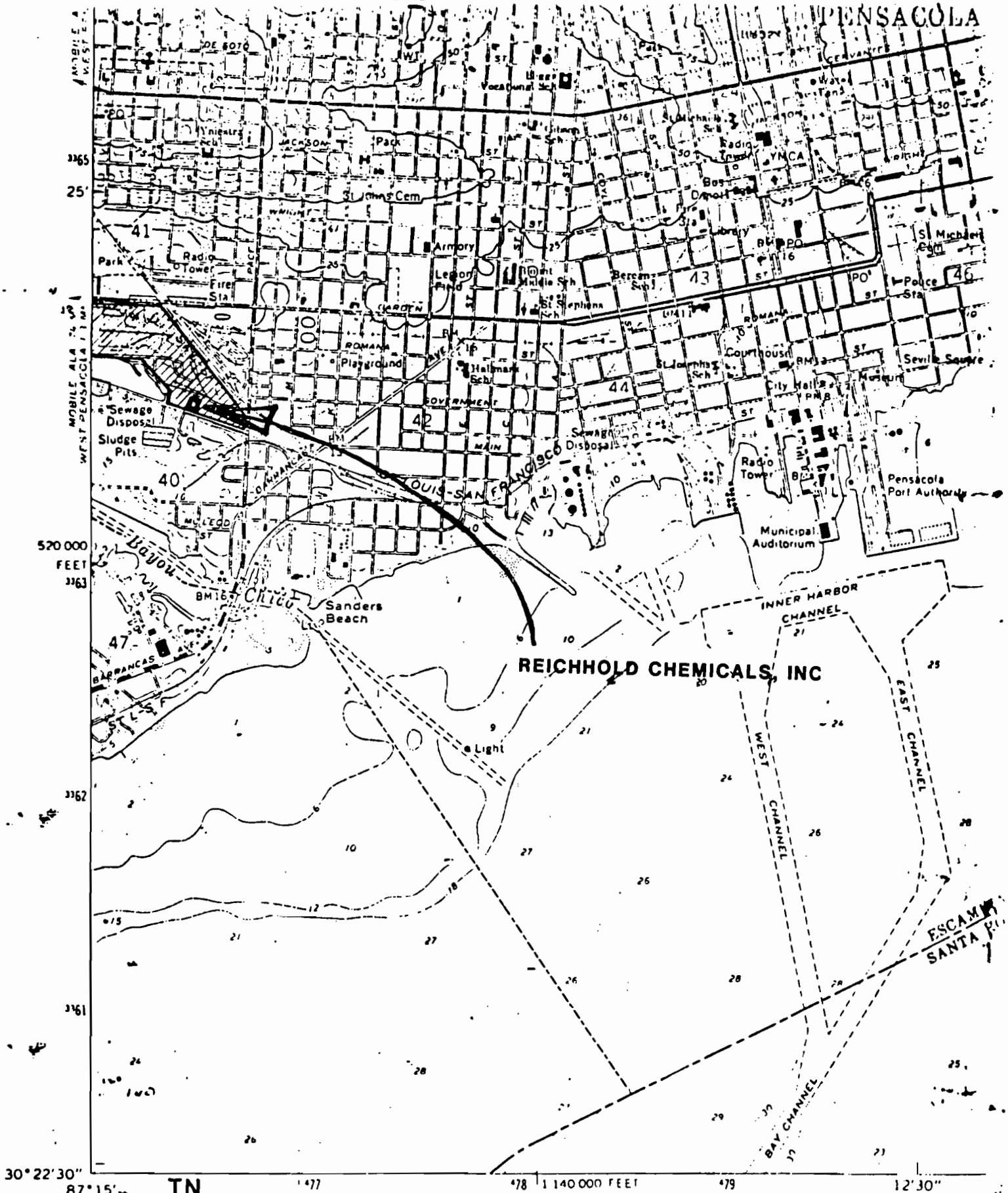
E. Emission Data Used in Modeling

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

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

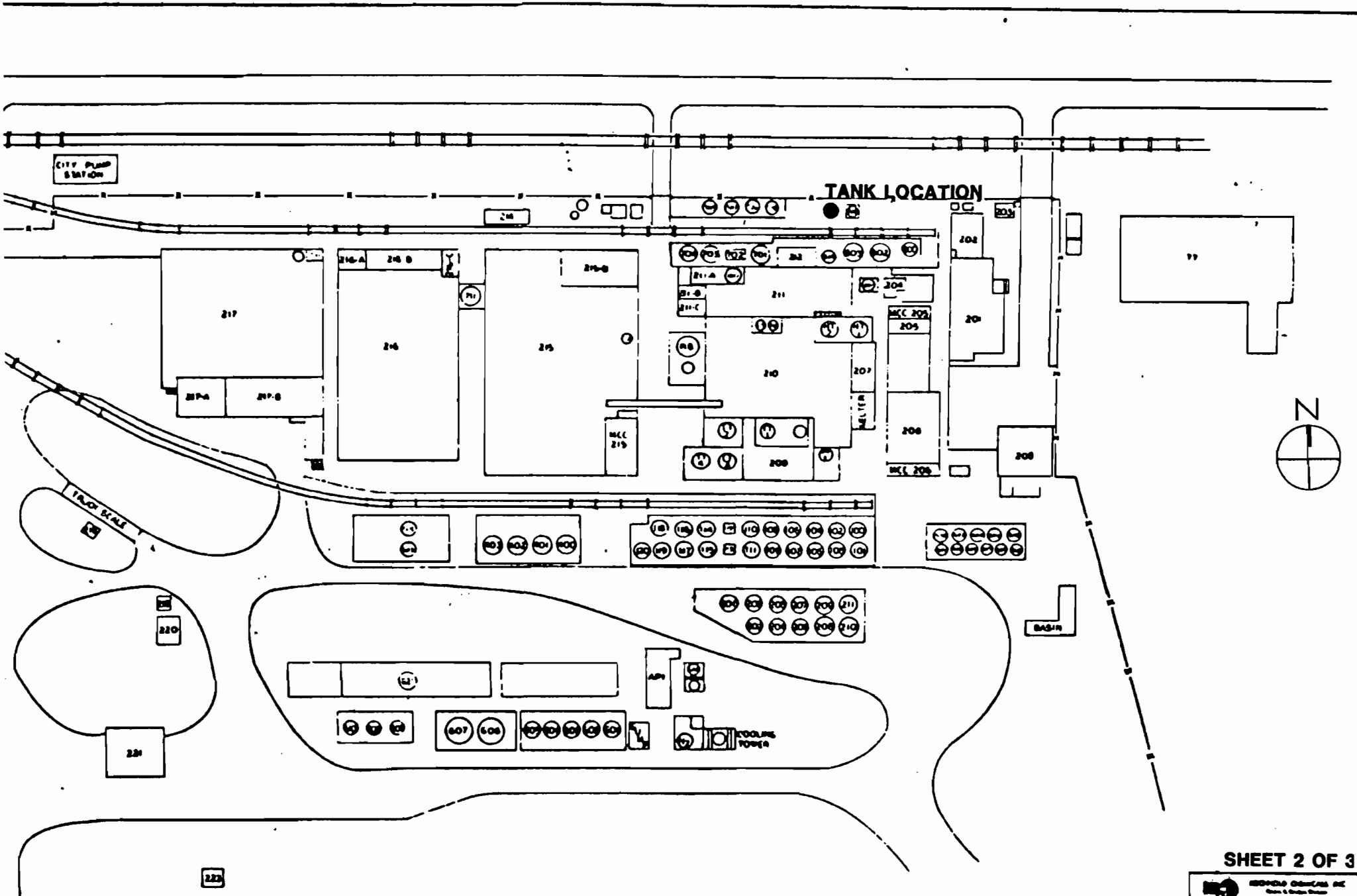
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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



LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3

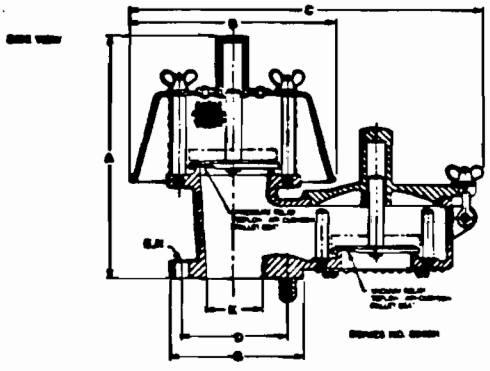


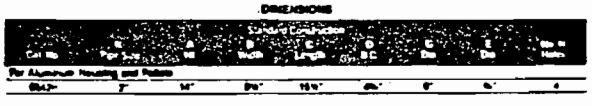
FACILITY PLAN

SHEET 2 OF 3

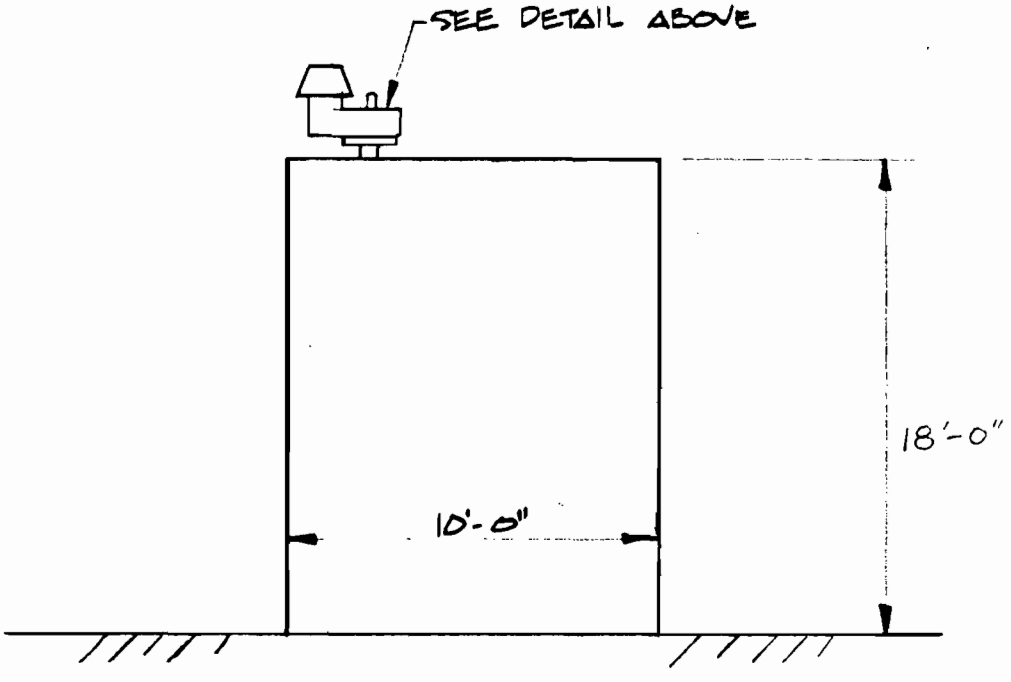
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

$100 pd.
9-2-88

AC 17-154330

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

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A. APPLICANT

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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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/3-/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

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Construction of an above ground, non-pressurized storage tank for Methacyclic Acid. Tank capacity is 10,000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants? _____

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

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

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		
Methacyclic Acid	Vapors	100.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 10,000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Methacyclic Acid	0.005	0.0235	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

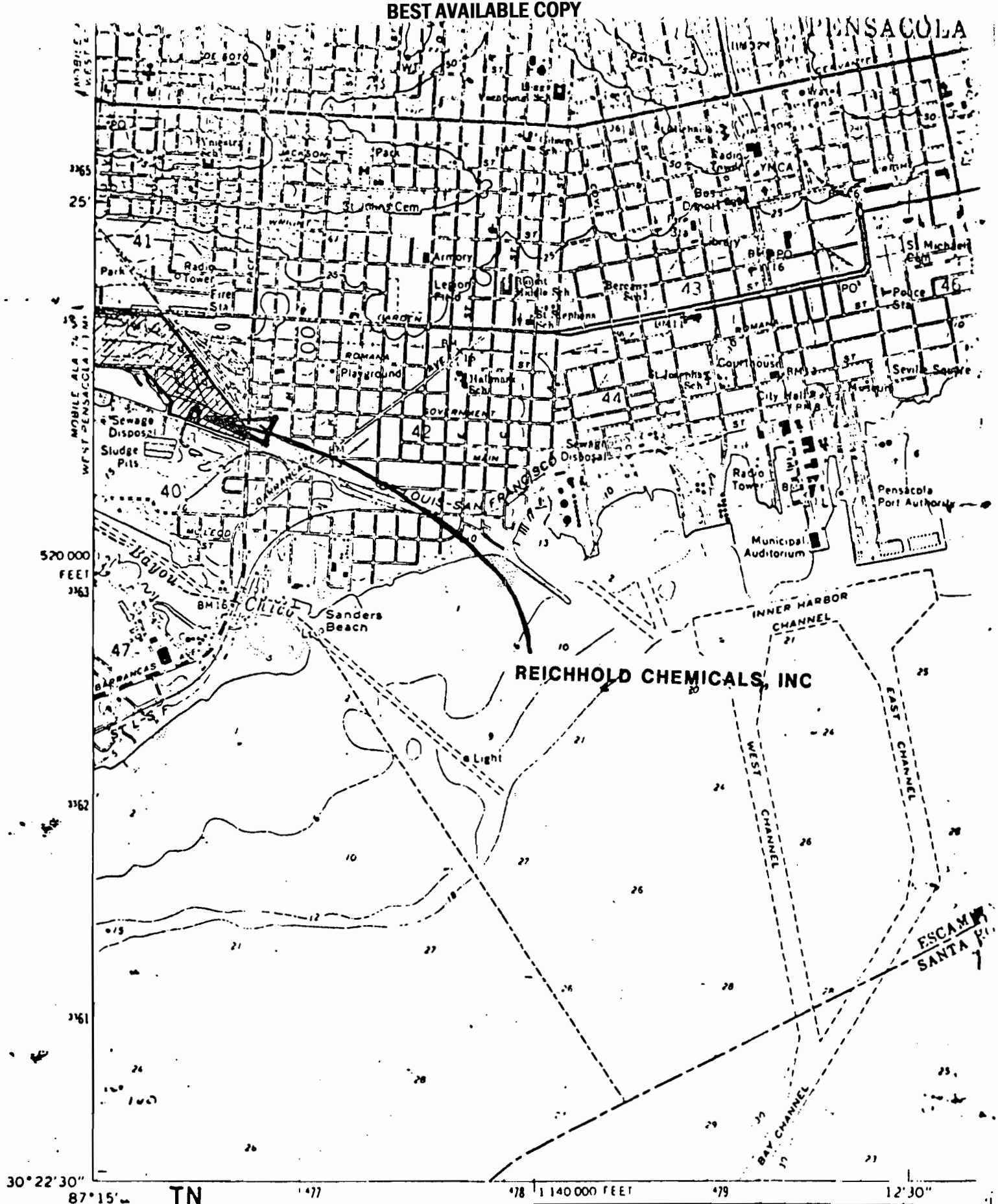
E. Emission Data Used in Modeling

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

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

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

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

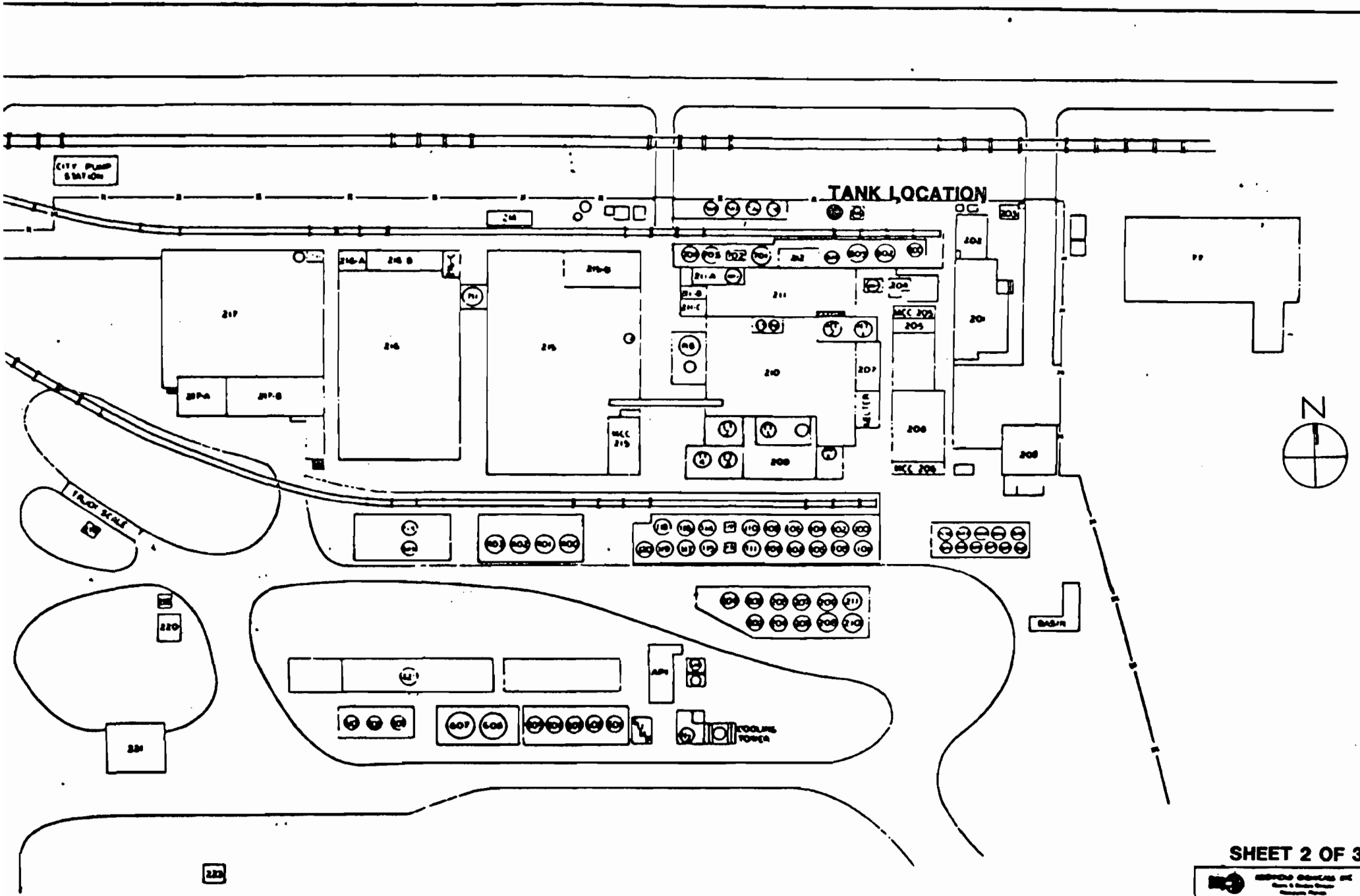


TN
GN 0.06' MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

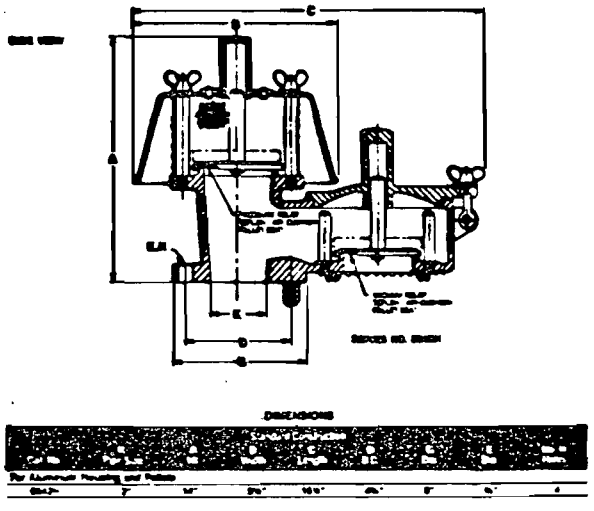
FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21. 1972 SHT 1 OF 3



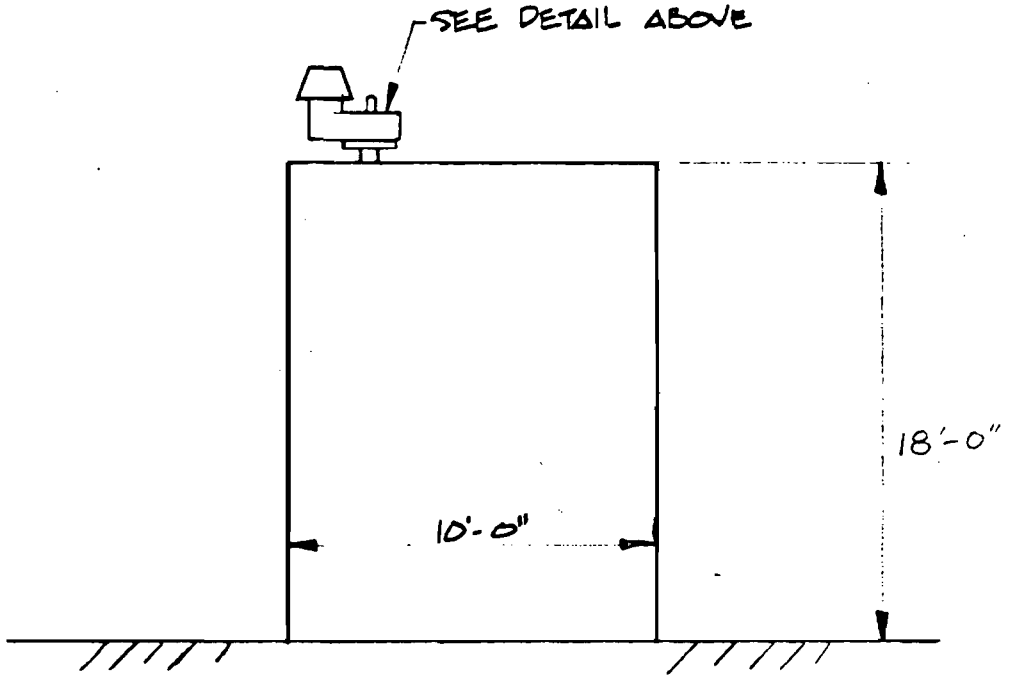
FACILITY PLAN

CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

$100 pd. 9-2-88

AC17-154331

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 3259

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith 8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 92736 which contains the solvent Butyl Cellosolve. Tank capacity is 5500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Product 92736	Butyl Cello-solve vapors	25.0	100 GPM (fill and discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 5500 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Butyl Cellosolve	0.0004	0.0002	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capecity, 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) _____

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

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

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Please provide the following supplements where required for this application.

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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 incluce 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.

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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.

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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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

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3.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

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i. Availability of construction materials and process chemicals:

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F. Describe the control technology selected:

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6. Energy:[2]

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8. Manufacturer:

9. Other locations where employed on similar processes:

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(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

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10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
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Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

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1. _____ Modified? If yes, attach description.

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3. _____ Modified? If yes, attach description.

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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	
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SO^2	_____	grams/sec

E. Emission Data Used in Modeling

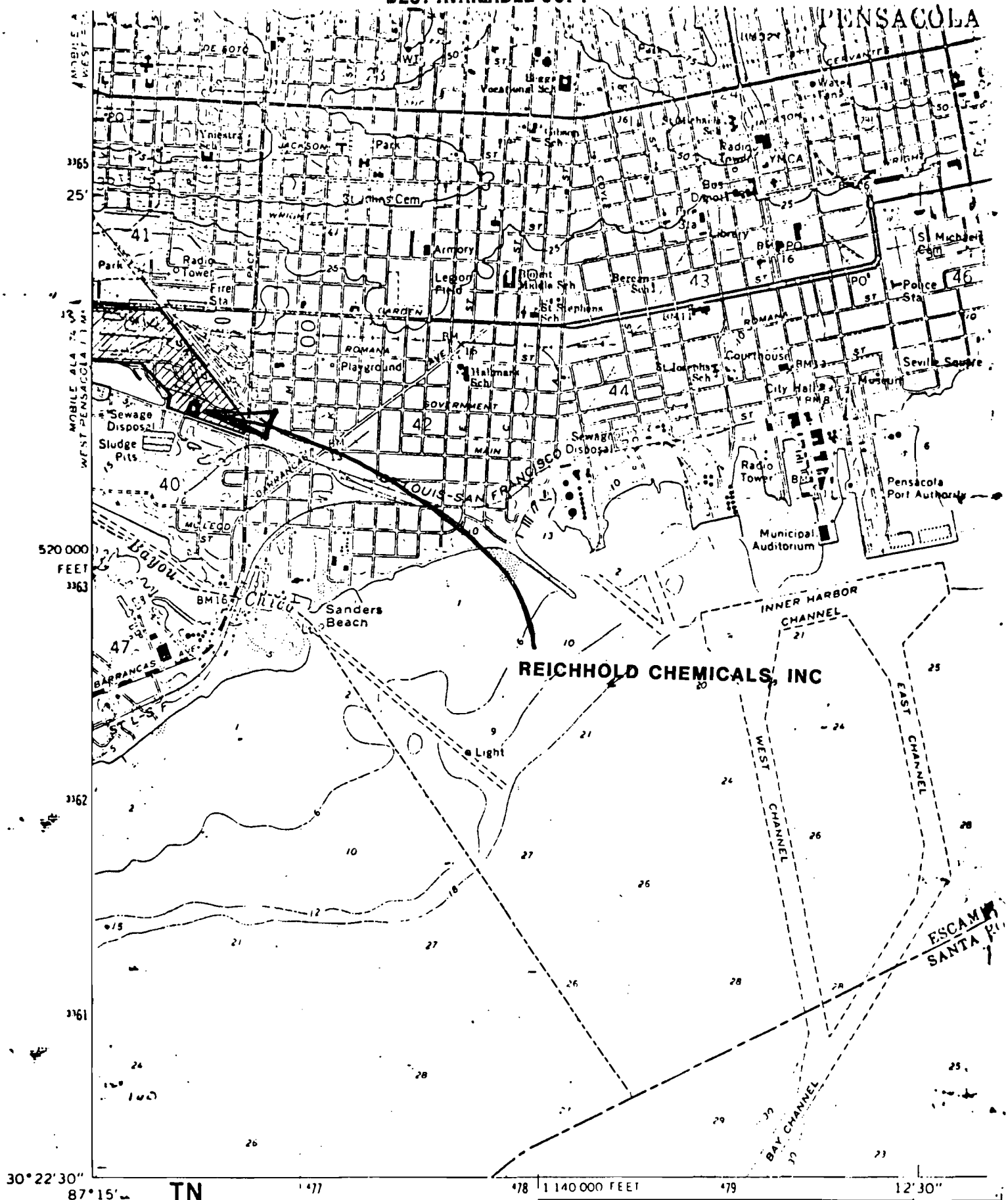
Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

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

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

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

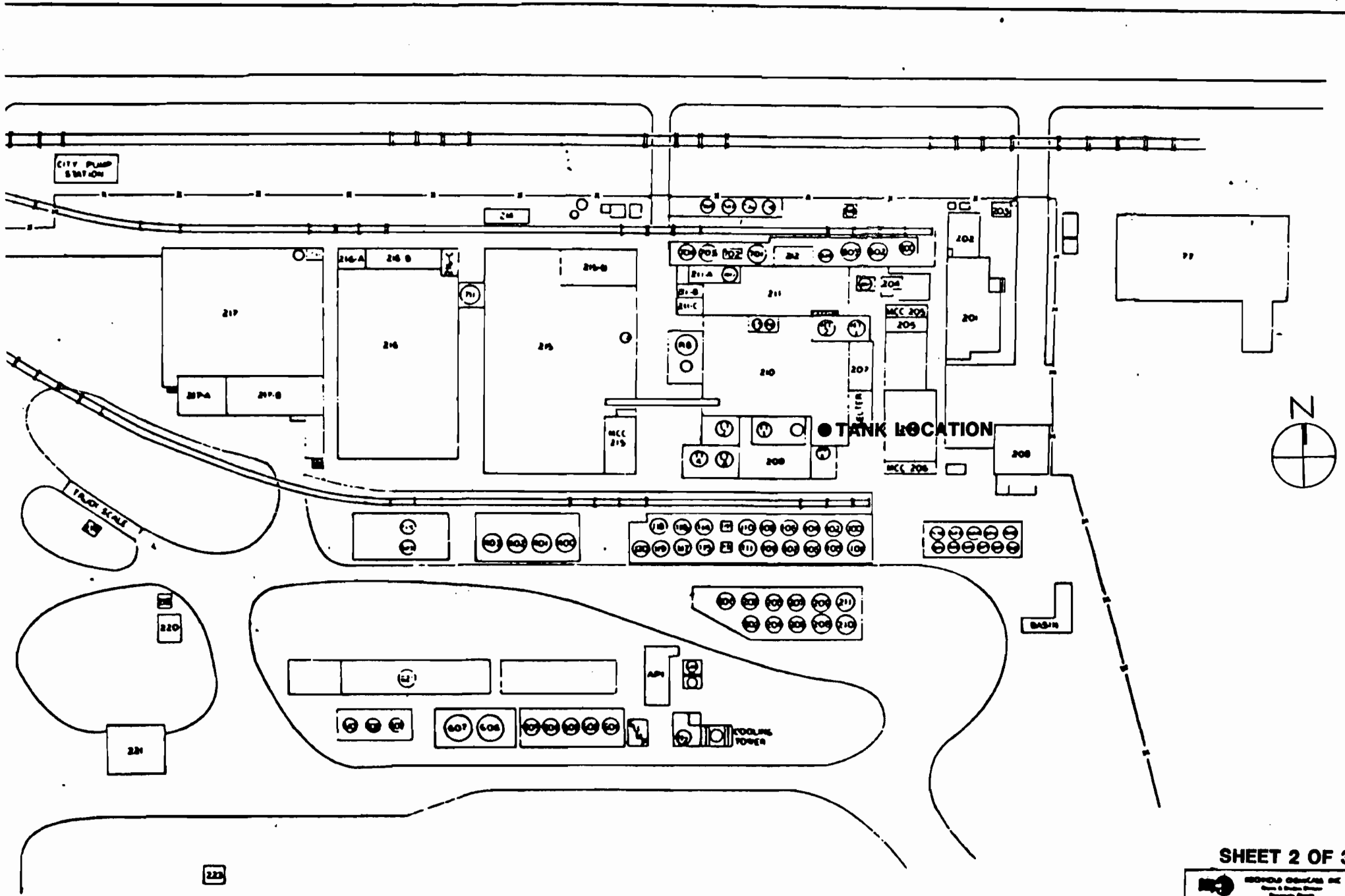
BEST AVAILABLE COPY



LOCATION MAP

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

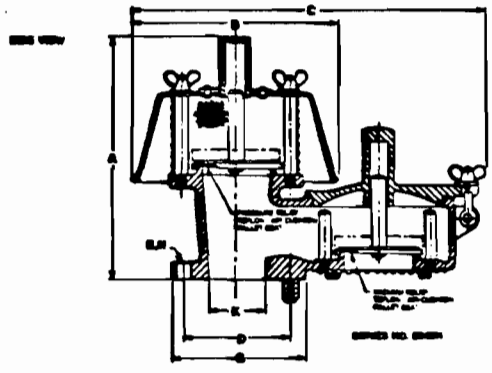
SHT 1 OF 3

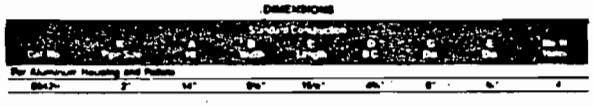


FACILITY PLAN

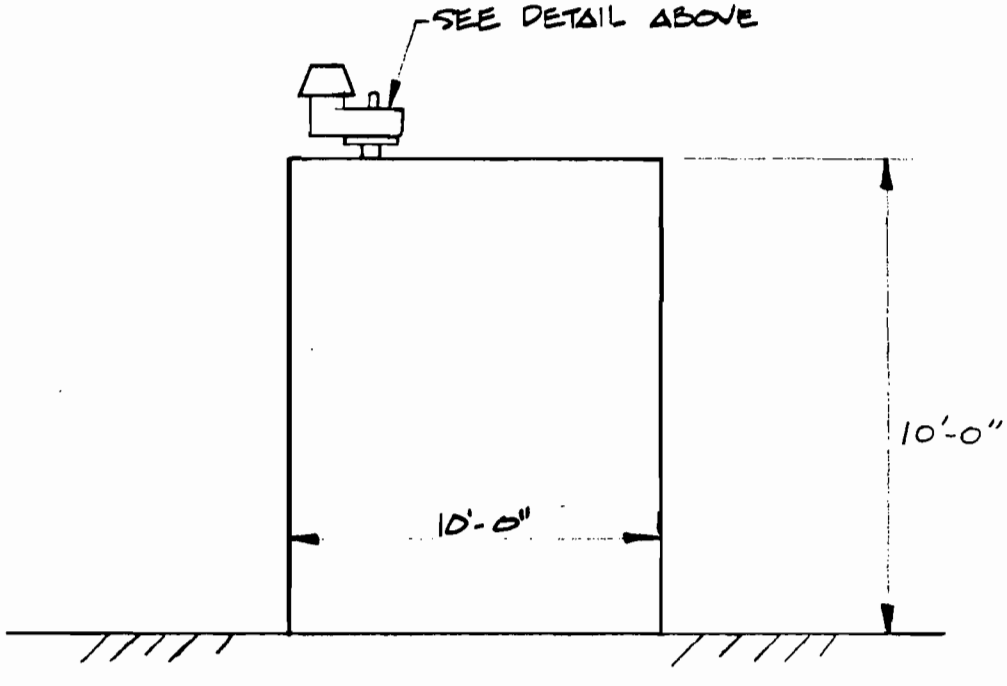
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.	Project REICHHOLD	Sheet 3 of 3
	Job No. 77301 Index	
	Date 8/26/88 By DBS	

AC 17-154331

$100 pd, 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/3/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 92736 which contains the solvent Butyl Cellosolve. Tank capacity is 5500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

M. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Product 92736	Butyl Cellosolve vapors	25.0	100 GPM (fill and discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 5500 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Butyl Cellosolve	0.0004	0.0002	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber incluce cross-section sketch, design preasure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

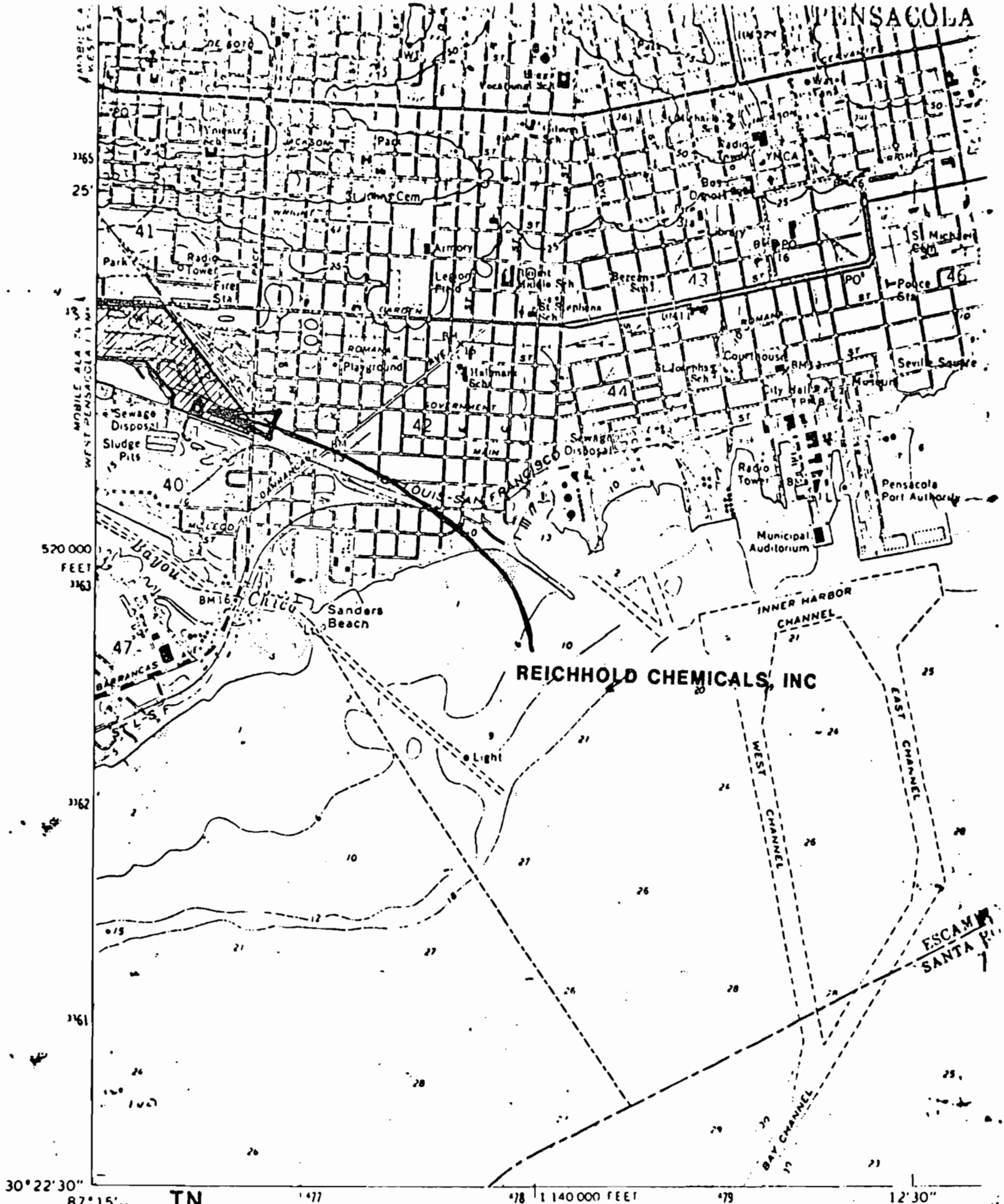
E. Emission Data Used in Modeling

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

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

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

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

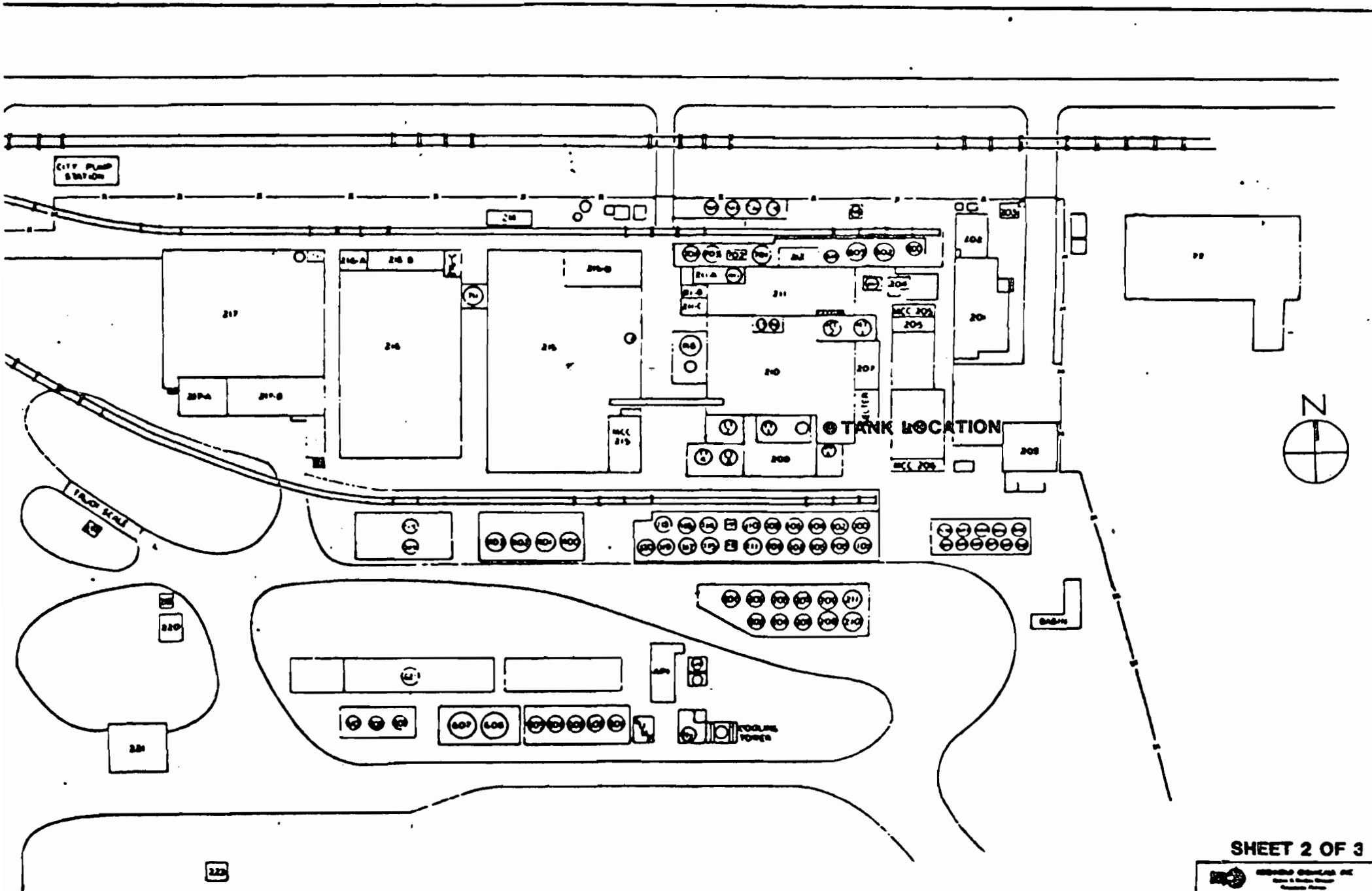


TN
GN 0°06' MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

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



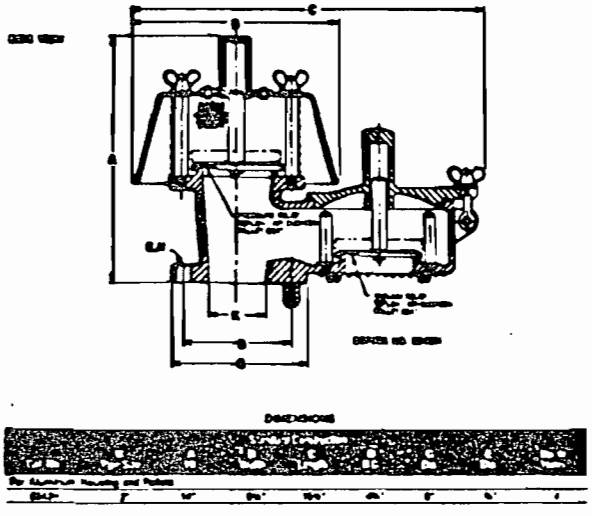
FACILITY PLAN

SHEET 2 OF 3

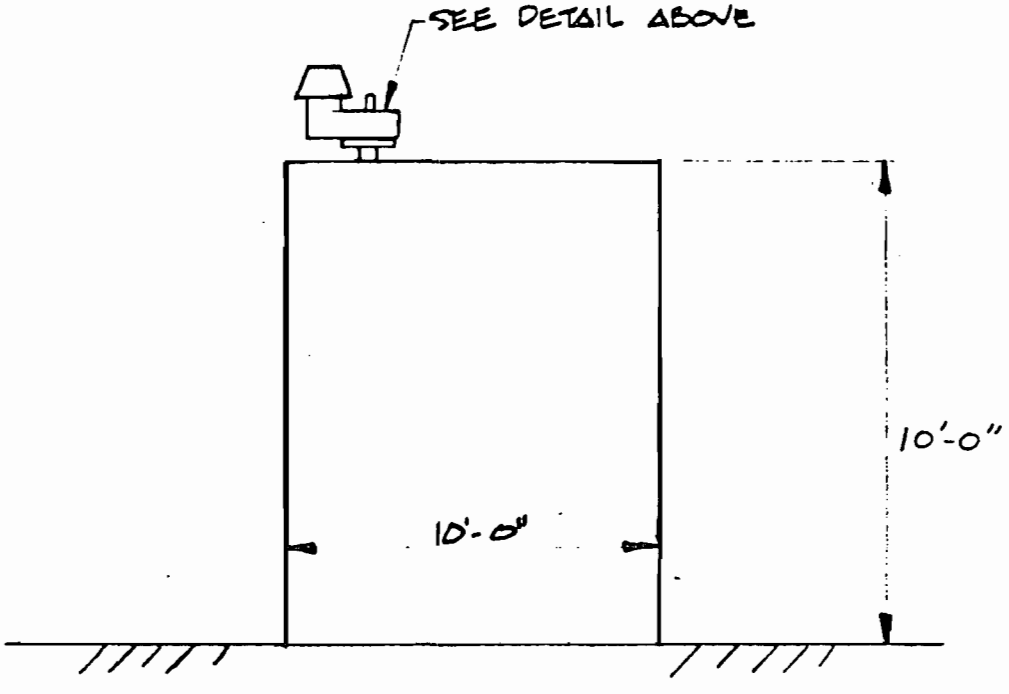
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515

302827



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.	Project REICHHOLD		Sheet 3 of 3
	Job No. 77301	Index	
	Date 8/26/08	By DBS	

AC 17-154332

#100 pd. 9-2-84

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 3259

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 44427 which contains the solvent Naptha. Tank capacity is 12500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Product 44427	Naptha Vapors	30.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 12500 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Naptha	0.059	0.2592	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

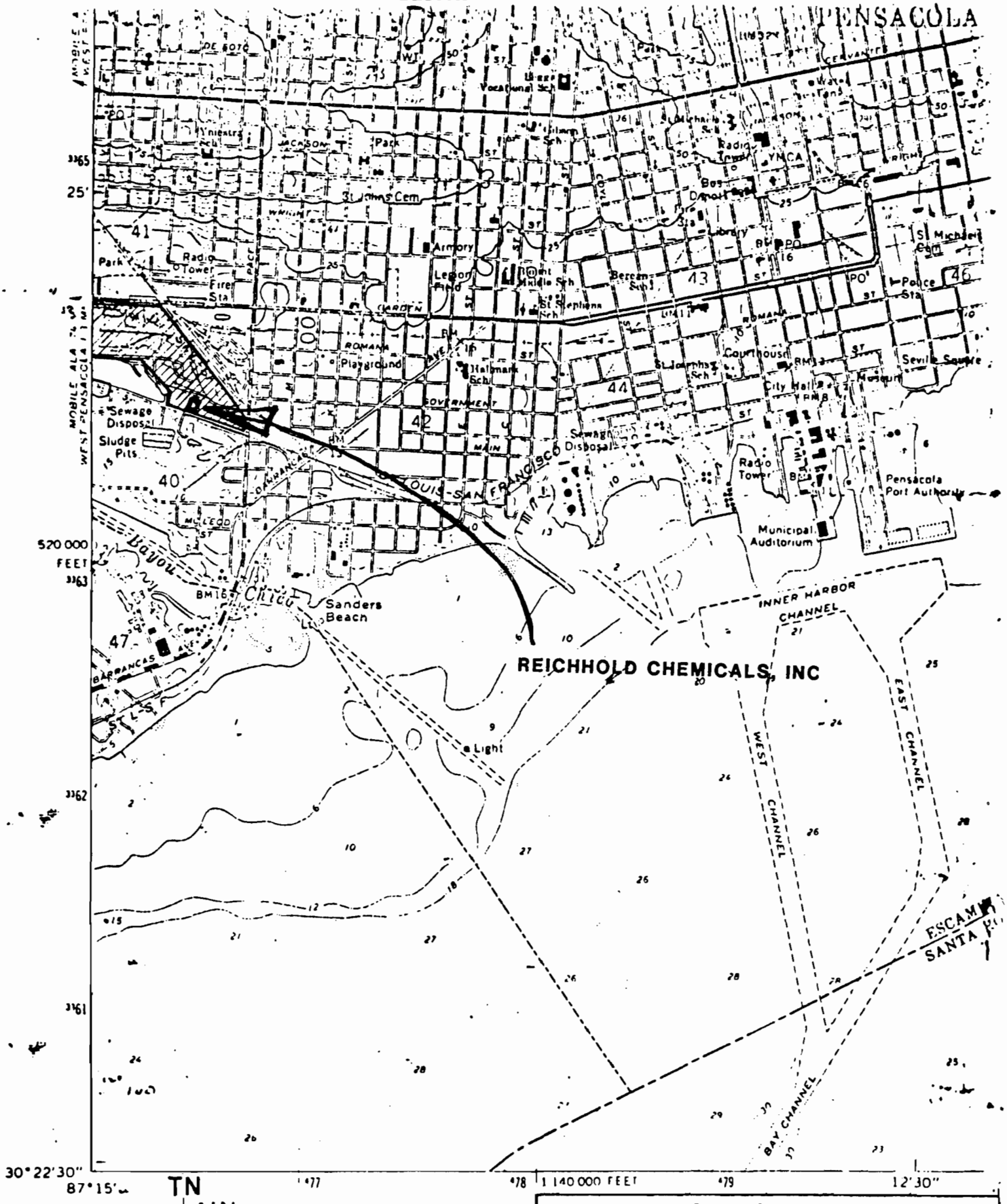
E. Emission Data Used in Modeling

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

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

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

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

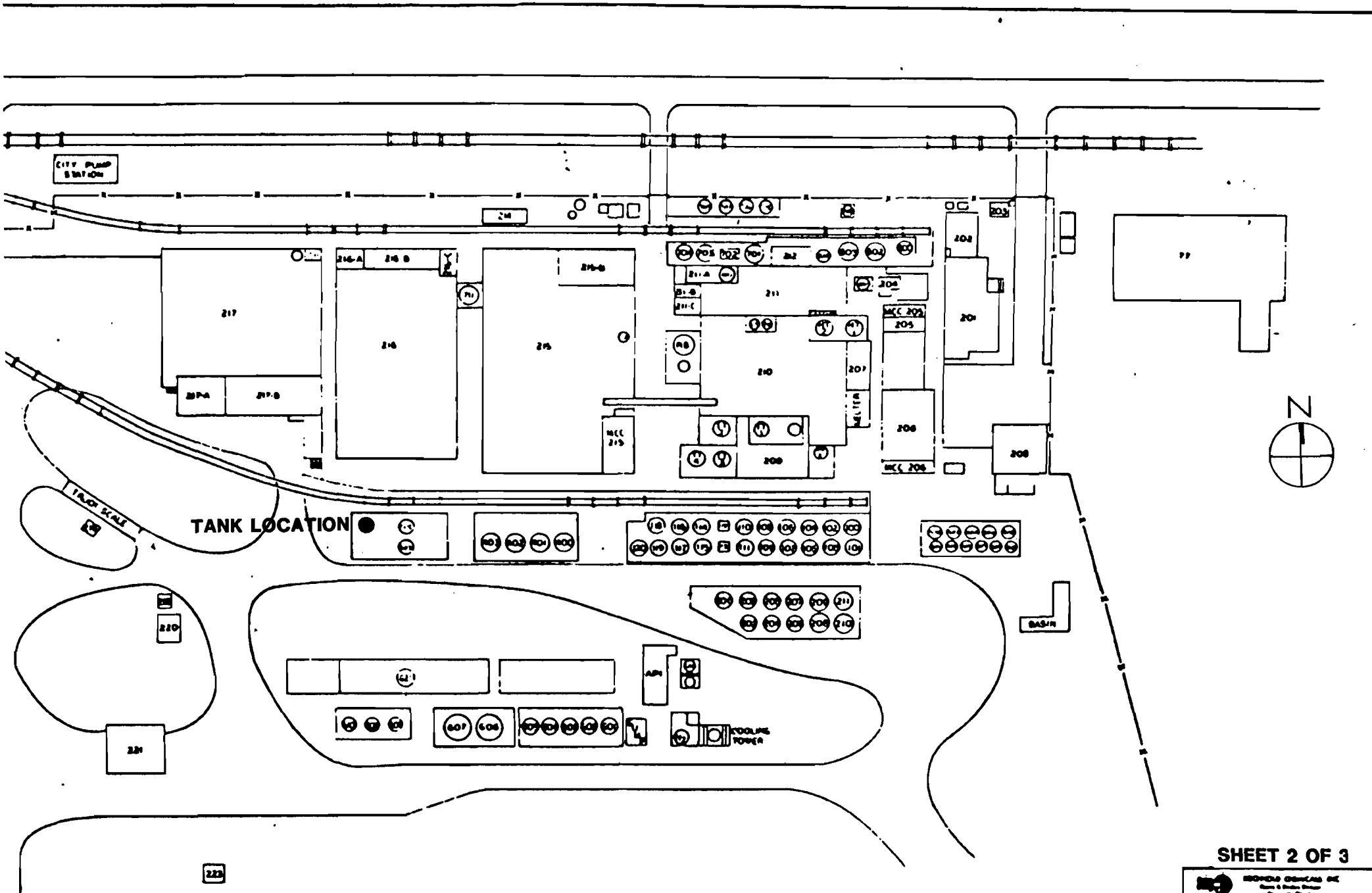


TN
GN 0°06' MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3



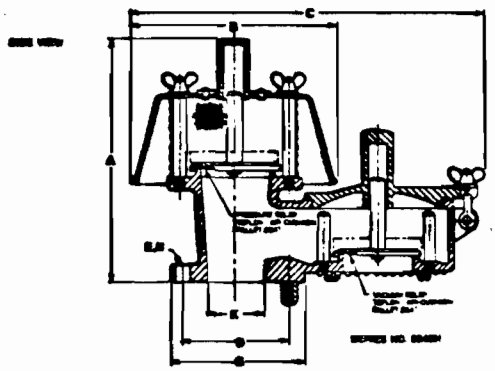
FACILITY PLAN

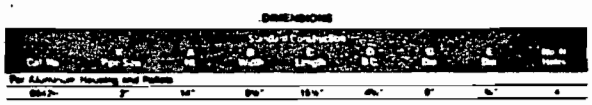
SHEET 2 OF 3

CHEMICAL COATINGS PLANT
PLOT PLAN

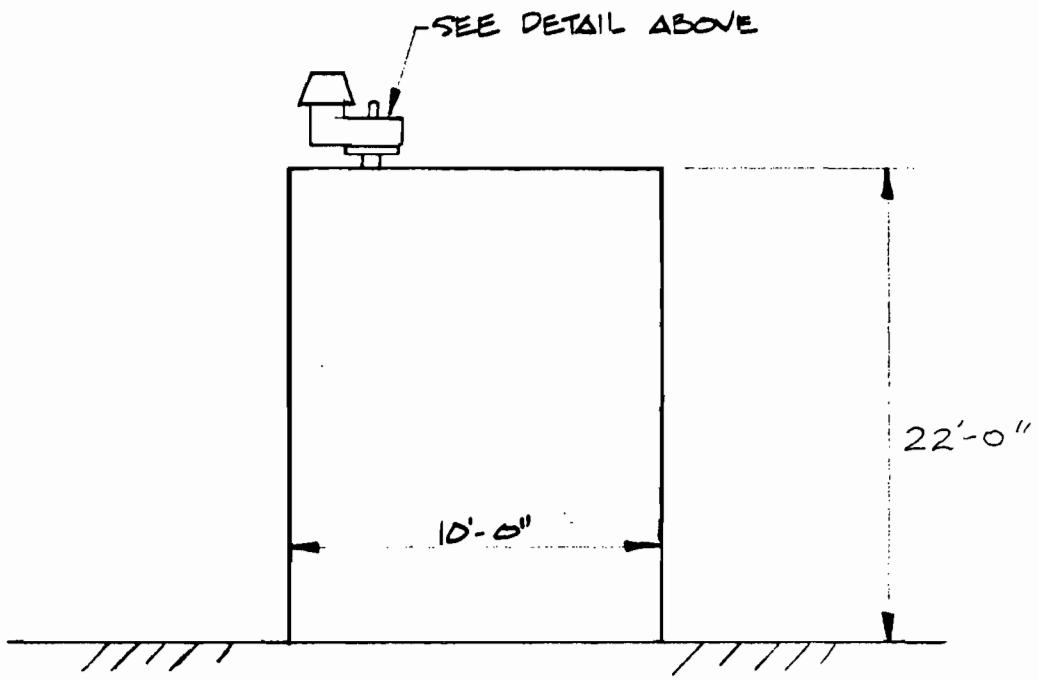
DWG. A-3515

302827





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.

Project REICHHOLD		Sheet 3 of 3
Job No. 77301	Index	
Date 8/26/88	By DBS	

BEST AVAILABLE COPY

AC 17-154332

$100 pd, 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East _____ North _____

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325[illegible]

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 44427 which contains the solvent Naptha. Tank capacity is 12500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Product 44427	Naptha Vapors	30.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 12500 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Naptha	0.059	0.2592	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring ____/____/____ to ____/____/____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

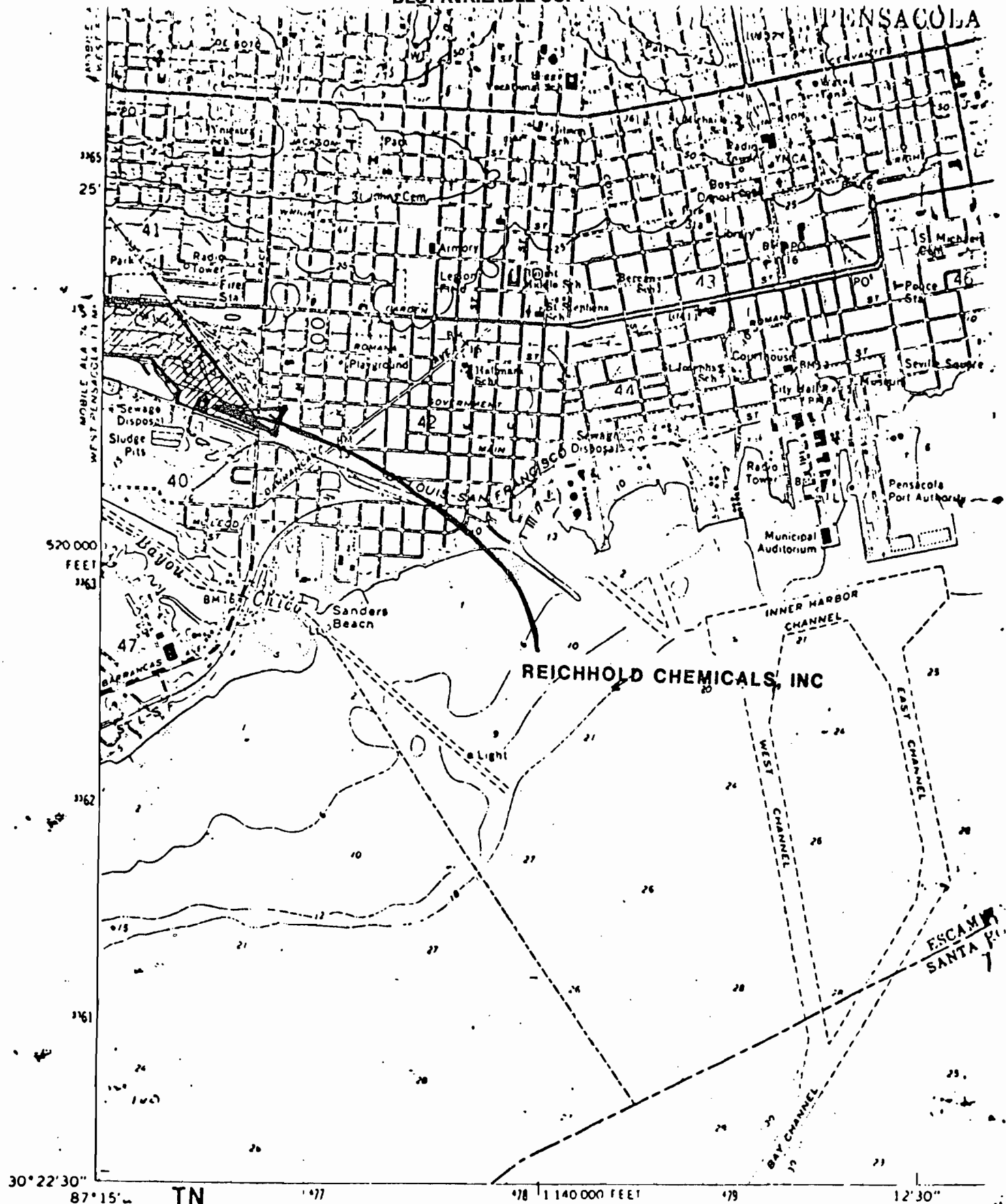
E. Emission Data Used in Modeling

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

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

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

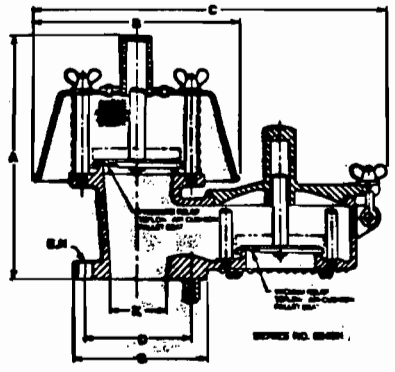
H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC 21 1972 SHT 1 OF 3

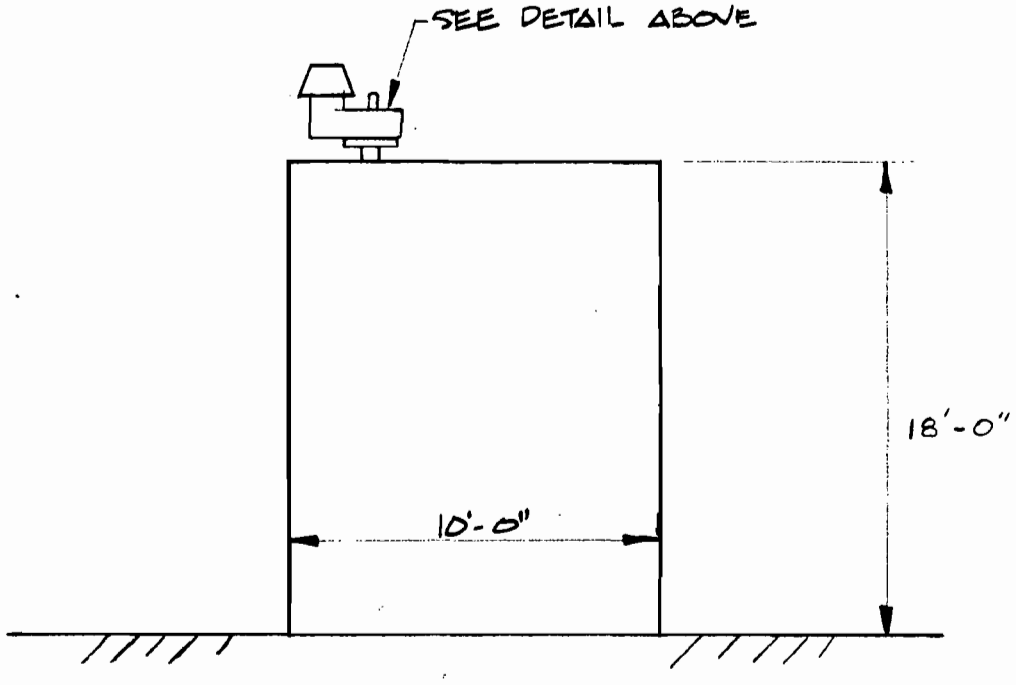
302827



DIMENSIONS

Cat No	K Pipe Size	A Ht	B Width	C Length	D B.C.	G Dia	E Dia	No. H Holes
For Aluminum Housing and Pallets								
884-2+	2"	14"	9¾"	19¼"	4¾"	8"	¾"	4

CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.

Project REICHHOLD		Sheet 3 of 3
Job No. 77301	Index	
Date 8/26/88	By DBS	

P

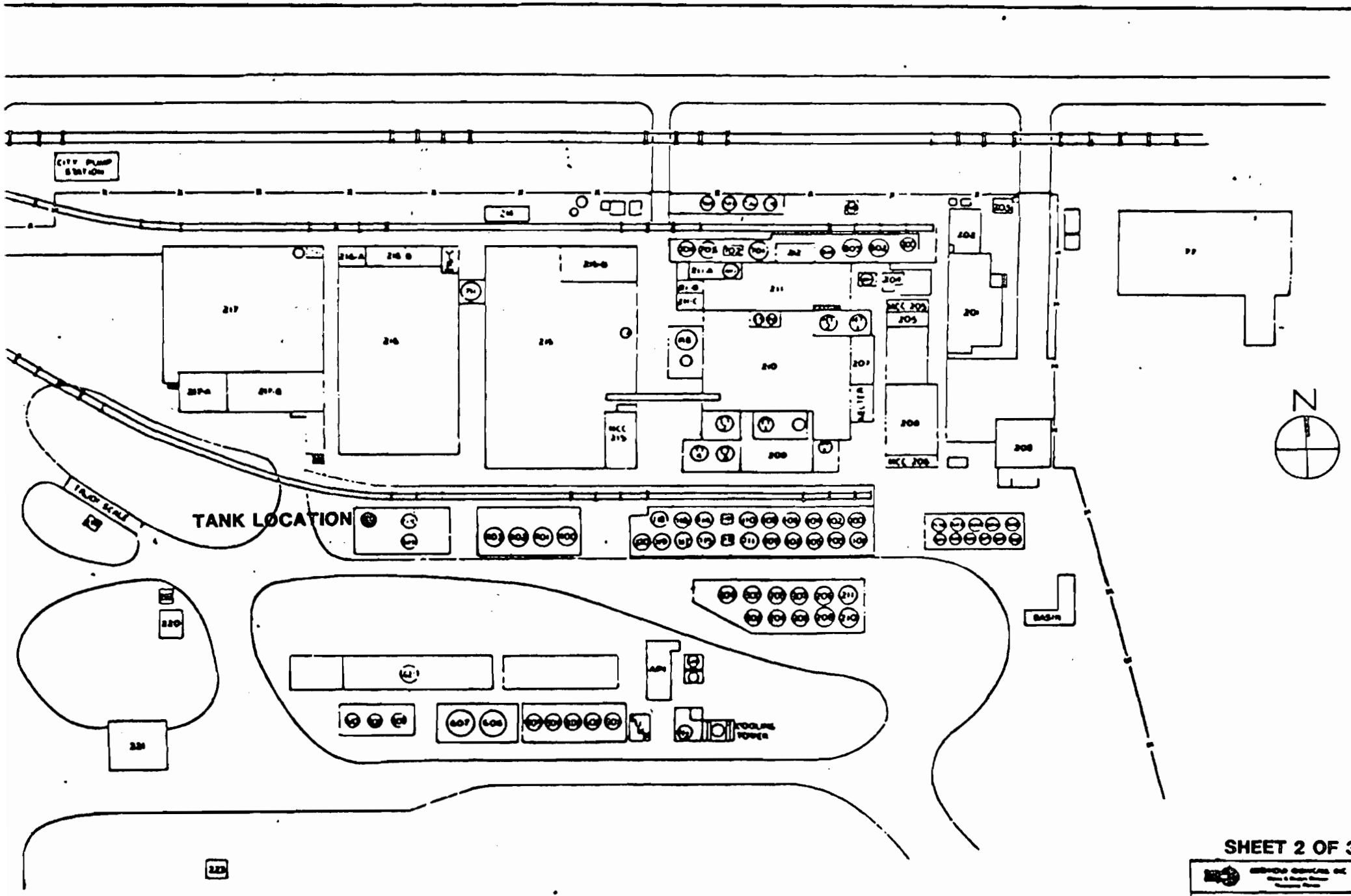
CONSERVATION HEATHER VELE

-SEE DETAIL ABOVE

SCHEMATIC ELEVATION

Project Reichhold	Sheet
Job No. 7730i Index	3
Date 8/26/88 By DBS	of 3

BASKERVILLE
DONOVAN
ENGINEERS, INC.



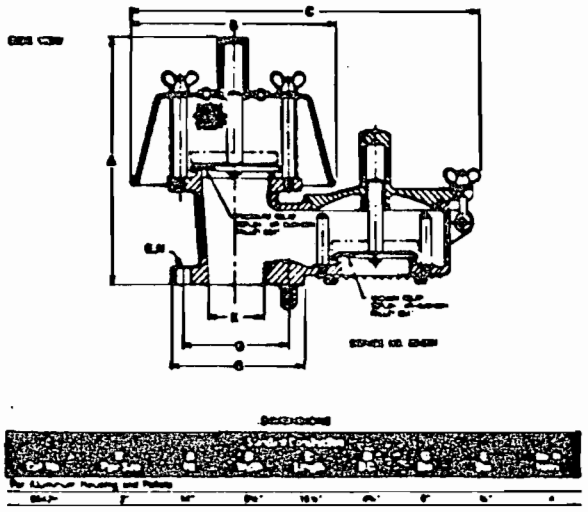
FACILITY PLAN

SHEET 2 OF 3

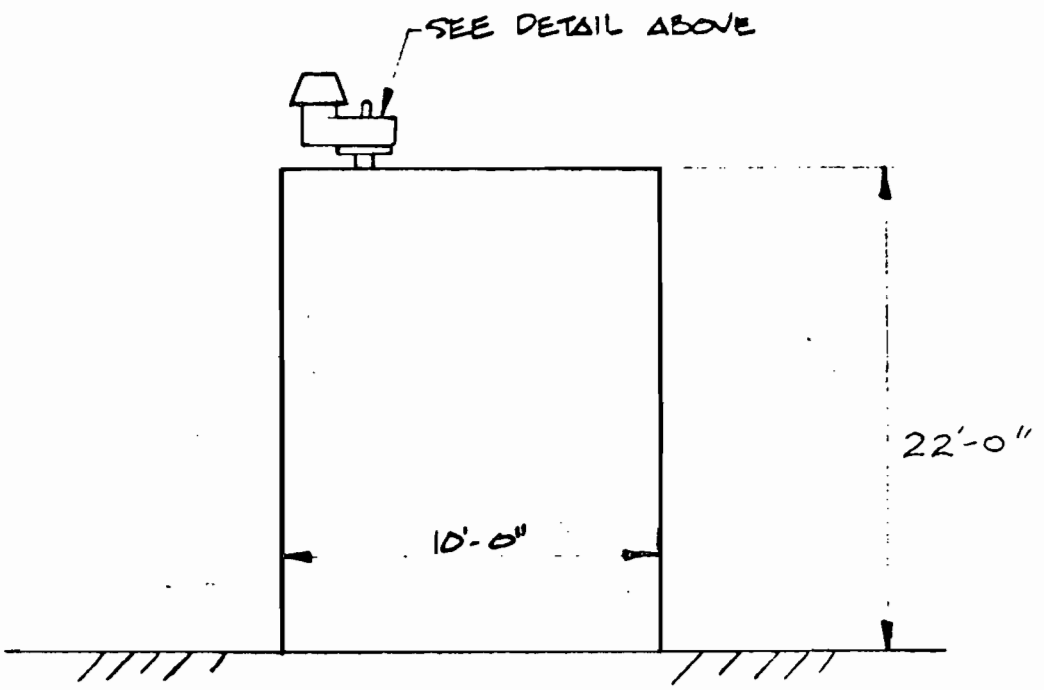
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515

302827



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

AC 17-154333 $100 pd. 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of REICHHOLD

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Phillip P. Ulichney

Phillip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88. Telephone No. 904-433-7621

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

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

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

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

Signed _____

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extant 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.

Construction of an above ground, non-pressurized storage tank for Styrene. Tank Capacity is 10000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants? _____

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

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

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		
Styrene	Vapors	100.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 10000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Styrene	0.0263	0.1152	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur:_____ Percent Ash:_____

Density: _____ lbs/gal Typical Percent Nitrogen:_____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

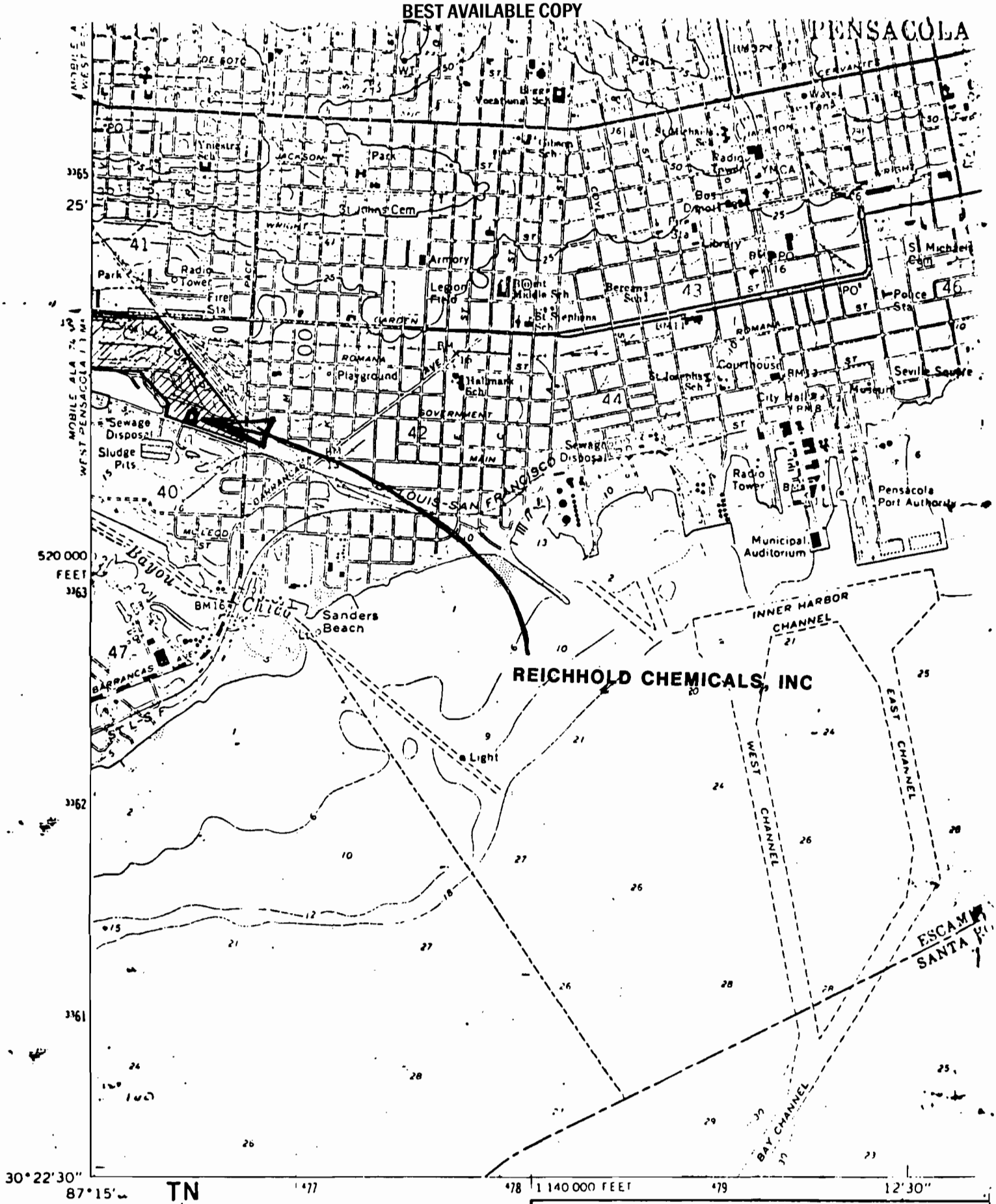
E. Emission Data Used in Modeling

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

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

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

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

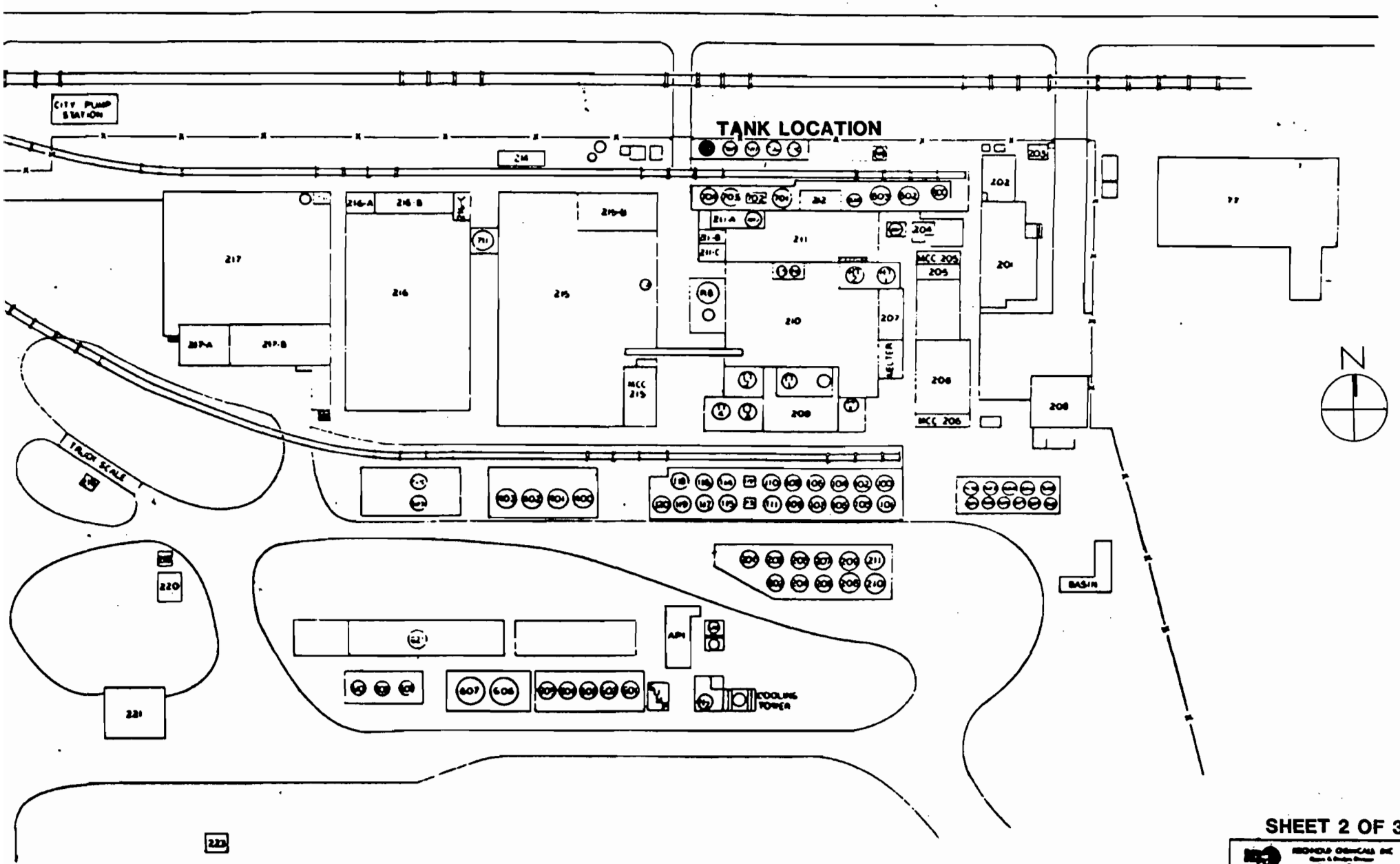


TN
GN 0°06' MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

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



FACILITY PLAN

CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515

AC 17-154333

$100 pd
9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of REICHHOLD

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Phillip P Ulichney

Phillip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/3/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/31/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Styrene. Tank Capacity is 10000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Styrene	Vapors	100.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 10000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Styrene	0.0263	0.1152	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO^{2}* _____ Wind spd/di:

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

E. Emission Data Used in Modeling

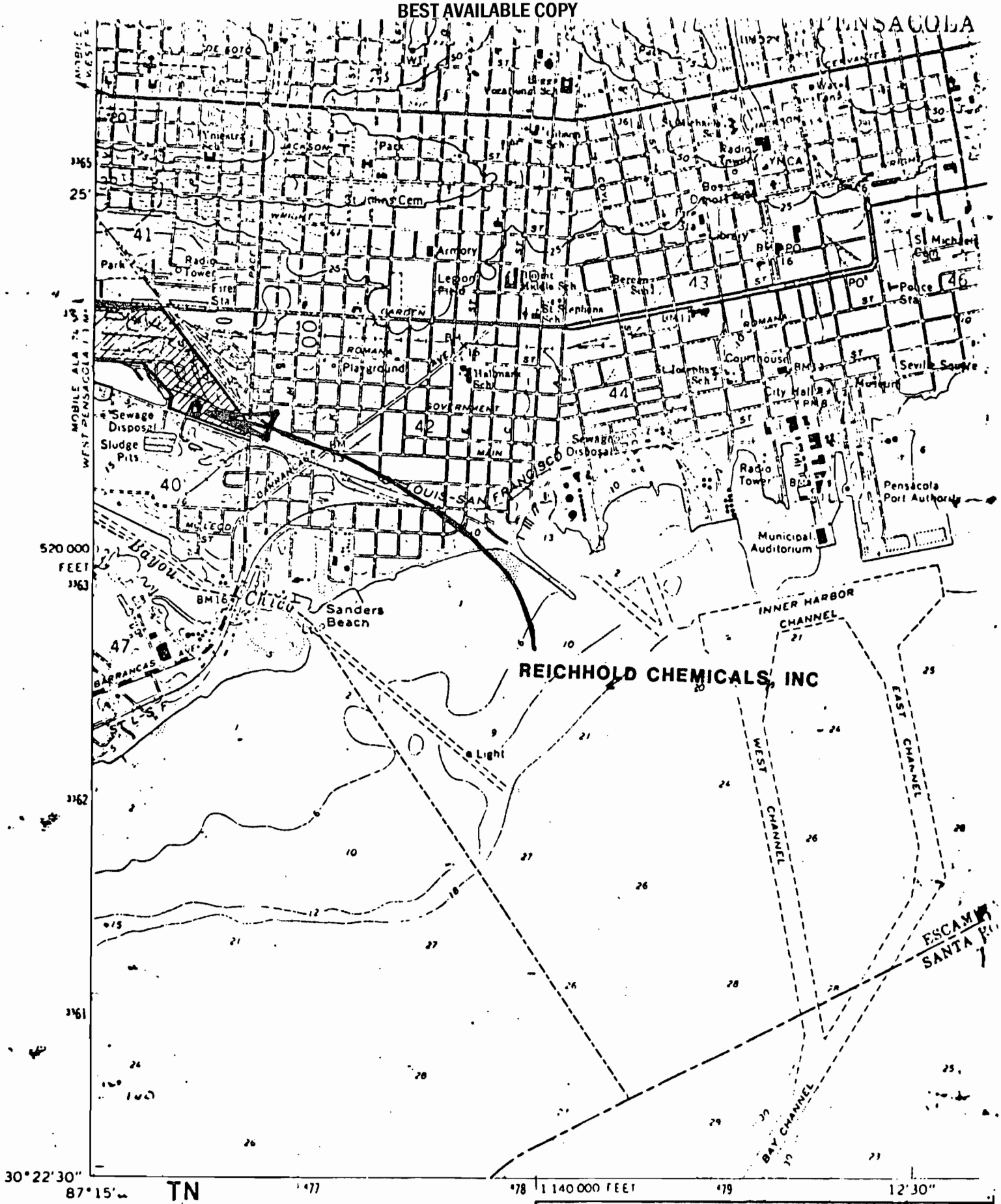
Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

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

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

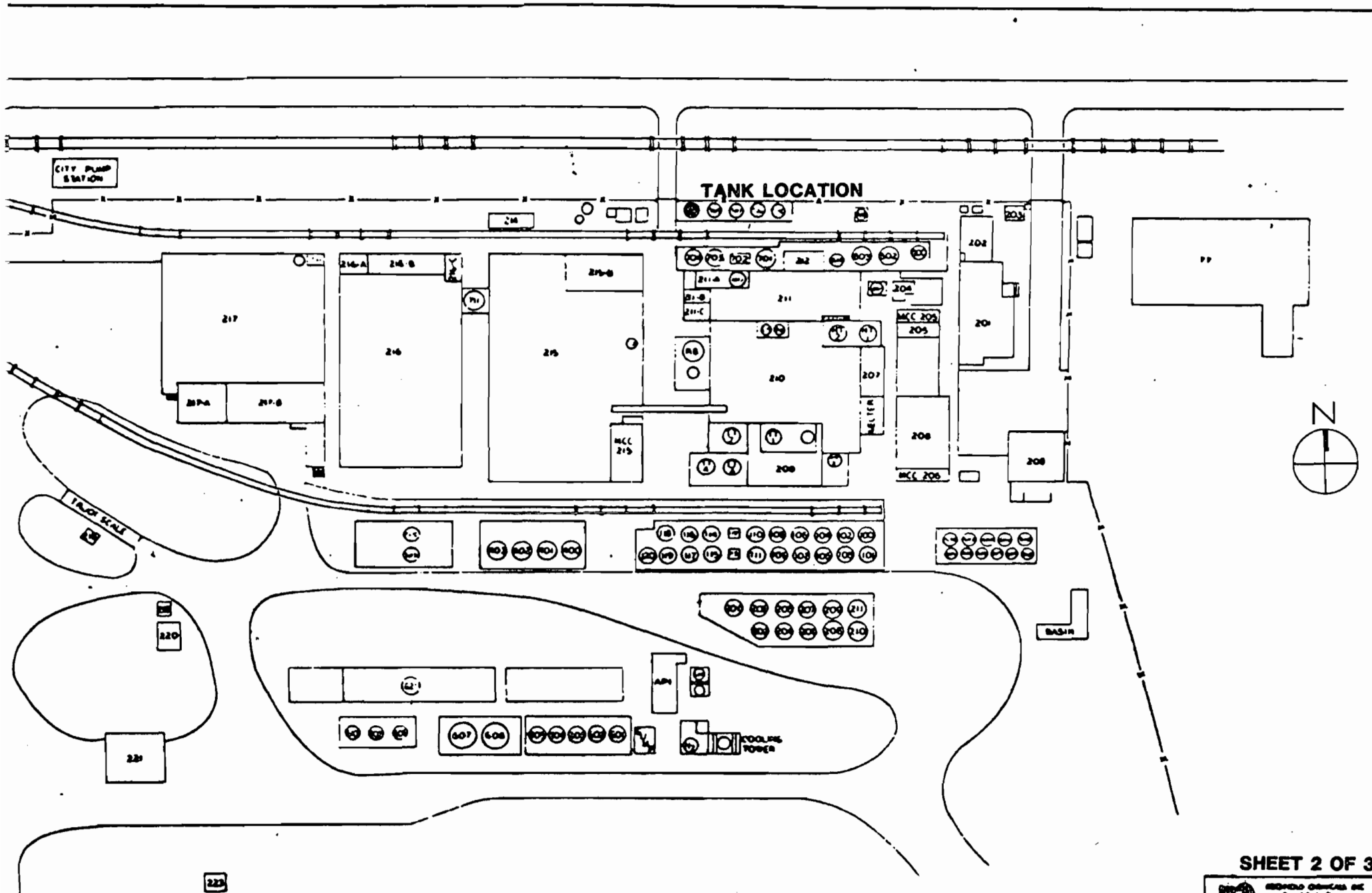
H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

BEST AVAILABLE COPY



LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21. 1972 SHT 1 OF 3

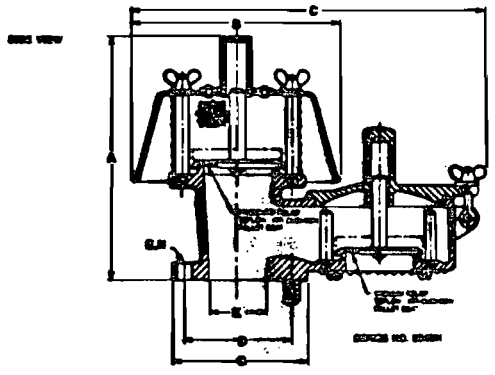


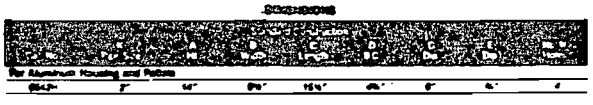
FACILITY PLAN

SHEET 2 OF 3

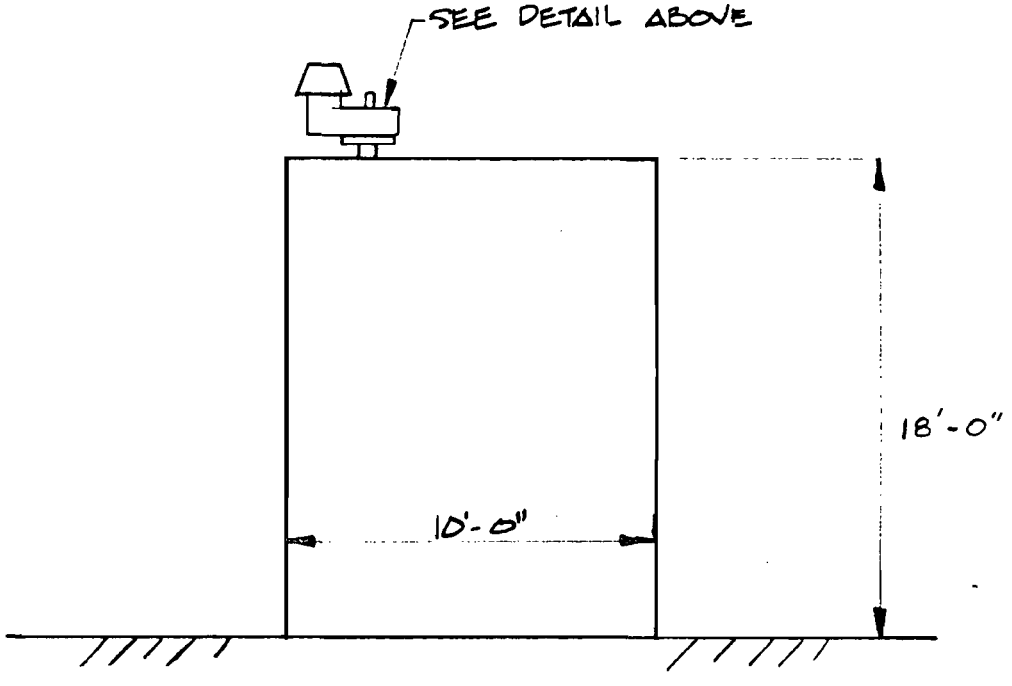
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BEST AVAILABLE COPY

AC17-154335

#100 pd
9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCE

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88. Telephone No. 904-433-7621

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

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

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

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

Signed D-PBSmith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D-PBSmith 9/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Butyl Cellosolve. Tank capacity is 12000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Butyl Cellosolve	Vapors	100.00	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 12000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Butyl Cello-solve	0.0034	0.0147	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

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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 appliceble standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

E. Emission Data Used in Modeling

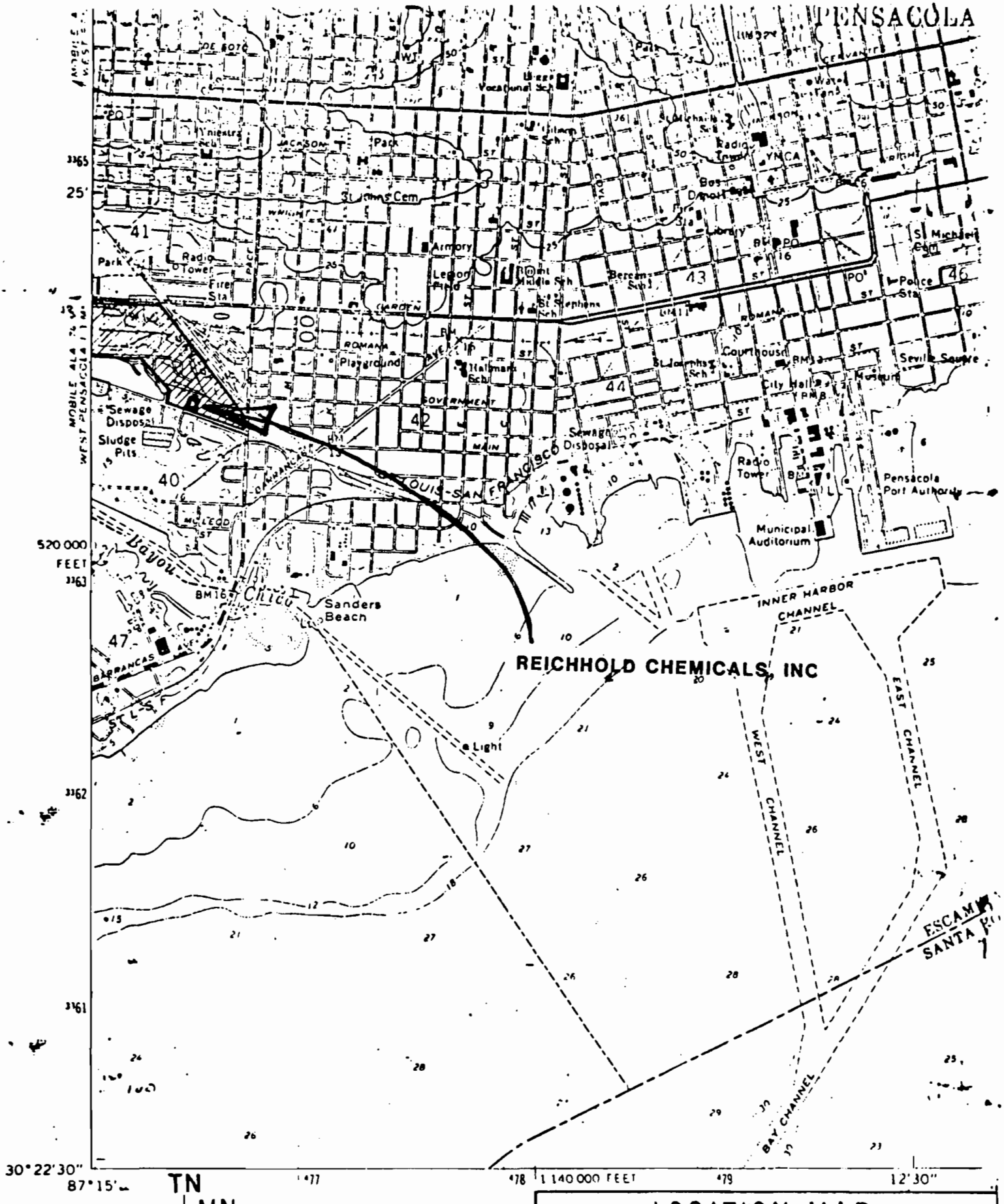
Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

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

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

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

BEST AVAILABLE COPY

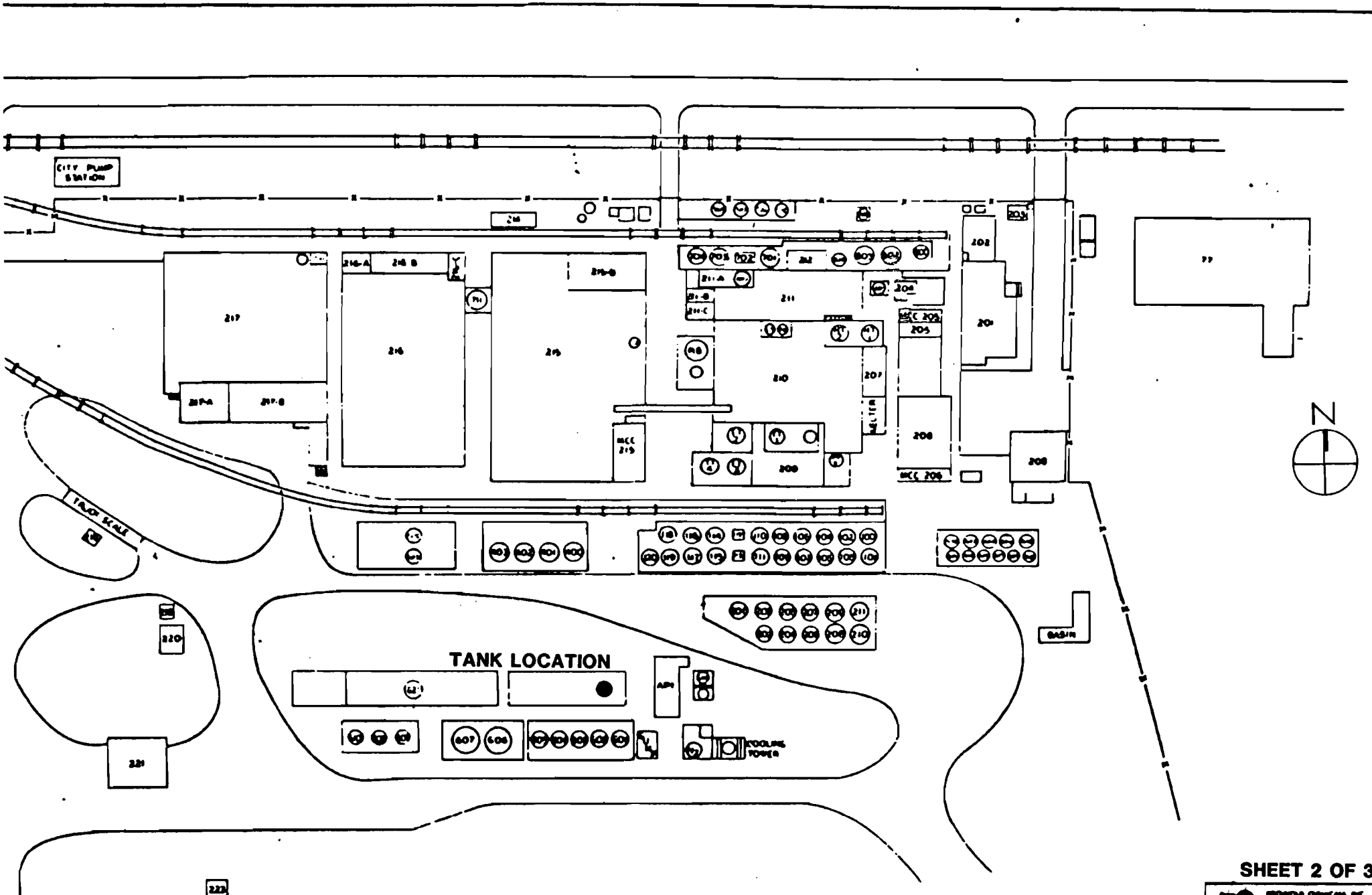


TN
GN 0°06' MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

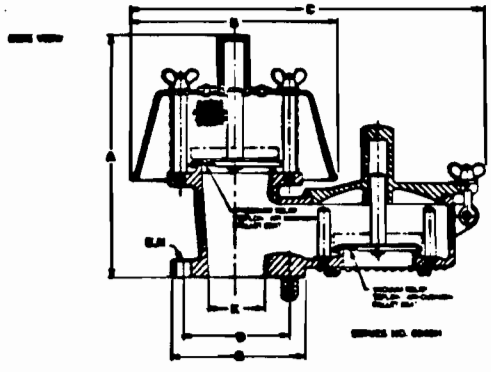
FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3

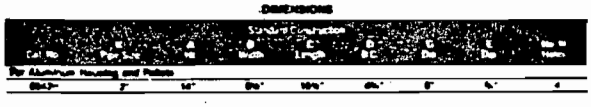


FACILITY PLAN

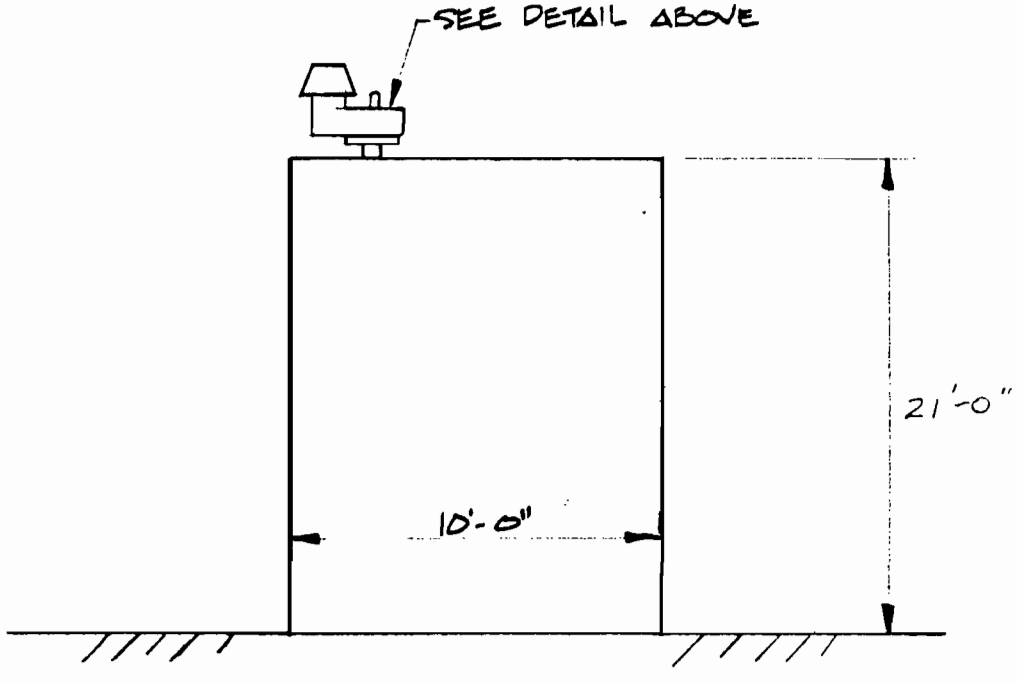
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.	Project REICHHOLD	Sheet 3 of 3
	Job No. 77301 Index	
	Date 8/26/88 By DBS	

AC 17-154335

$100 pd. 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East _____ North _____

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88. Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith
8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Butyl Cellosolve. Tank capacity is 12000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Butyl Cellosolve	Vapors	100.00	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 12000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Butyl Cello-solve	0.0034	0.0147	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

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

Annual Average _____ Maximum _____

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

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

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Contaminant	Rate or Concentration

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Period of Monitoring _____/_____/_____ to _____/_____/_____
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Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

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[ ] Yes [ ] No [ ] Unknown

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1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

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3. Upper air (mixing height) data obtained from (location)_____

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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	
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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.

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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.

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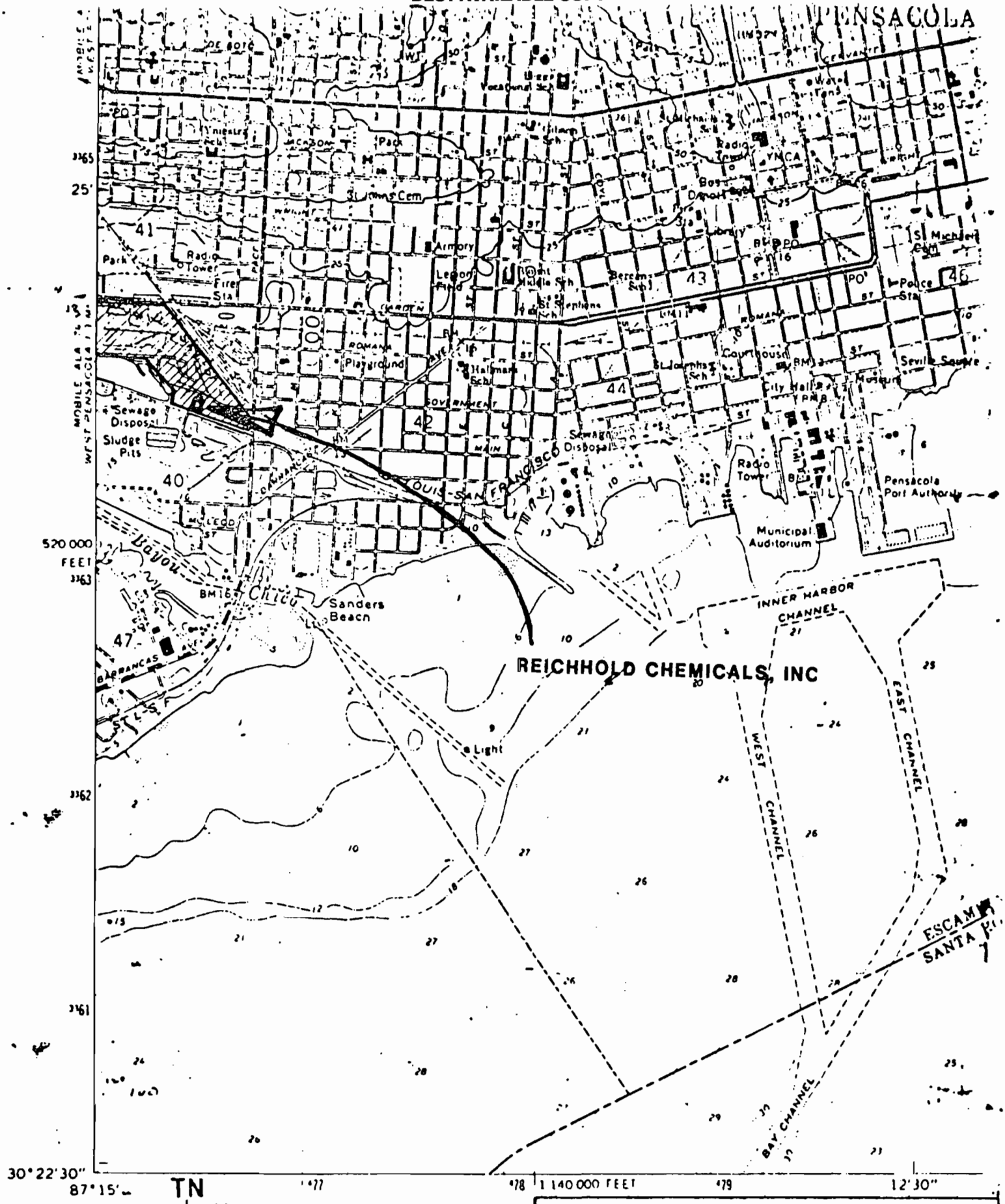

TN
GN 0°06' MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
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REICHHOLD CHEMICALS, INC.
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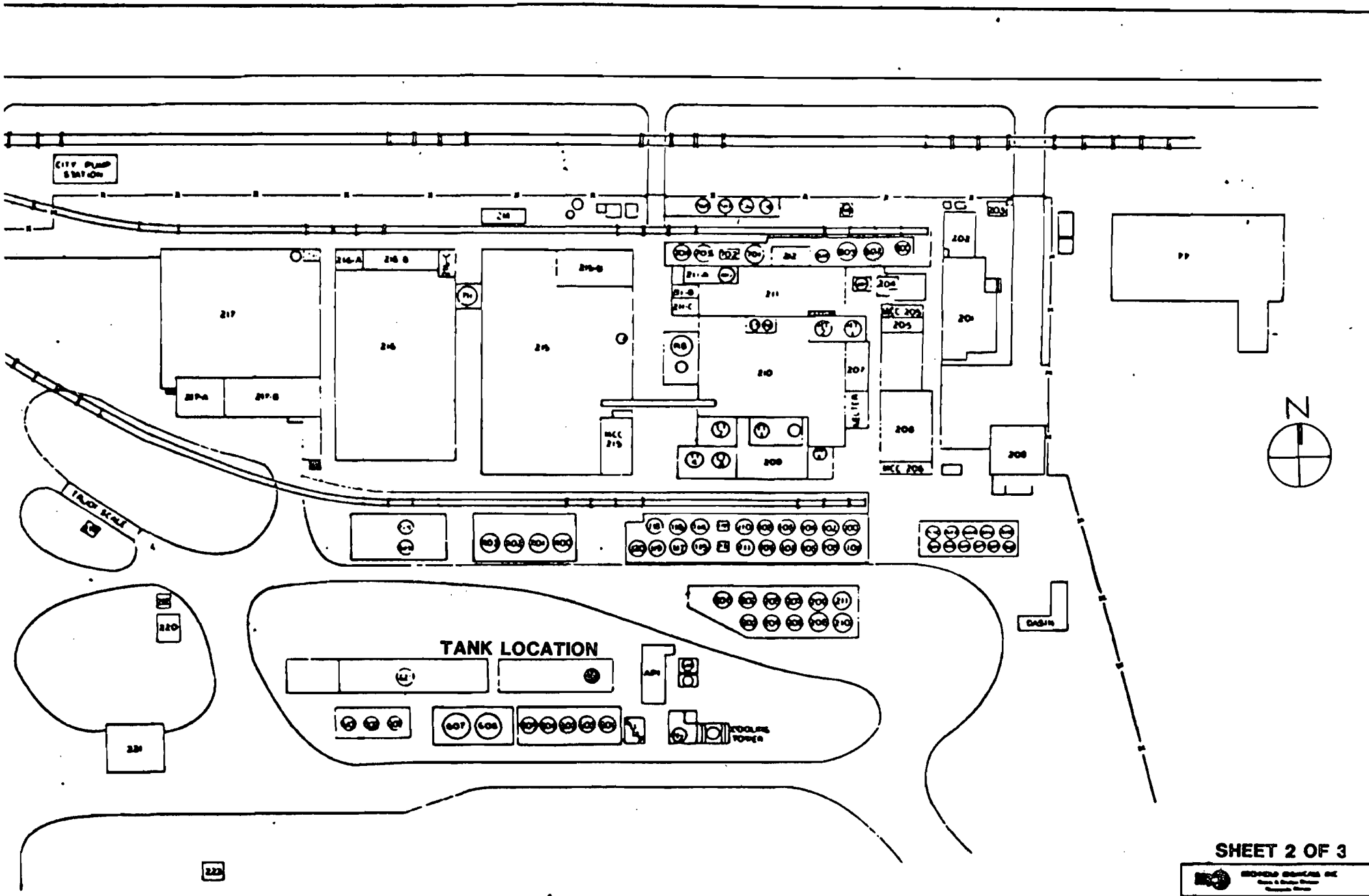


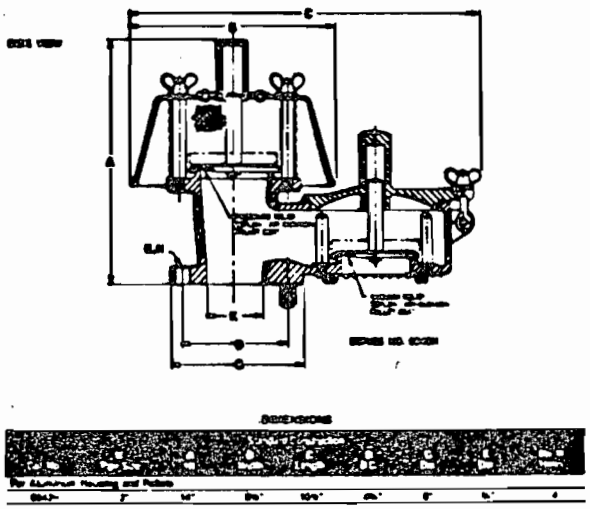
FACILITY PLAN

SHEET 2 OF 3

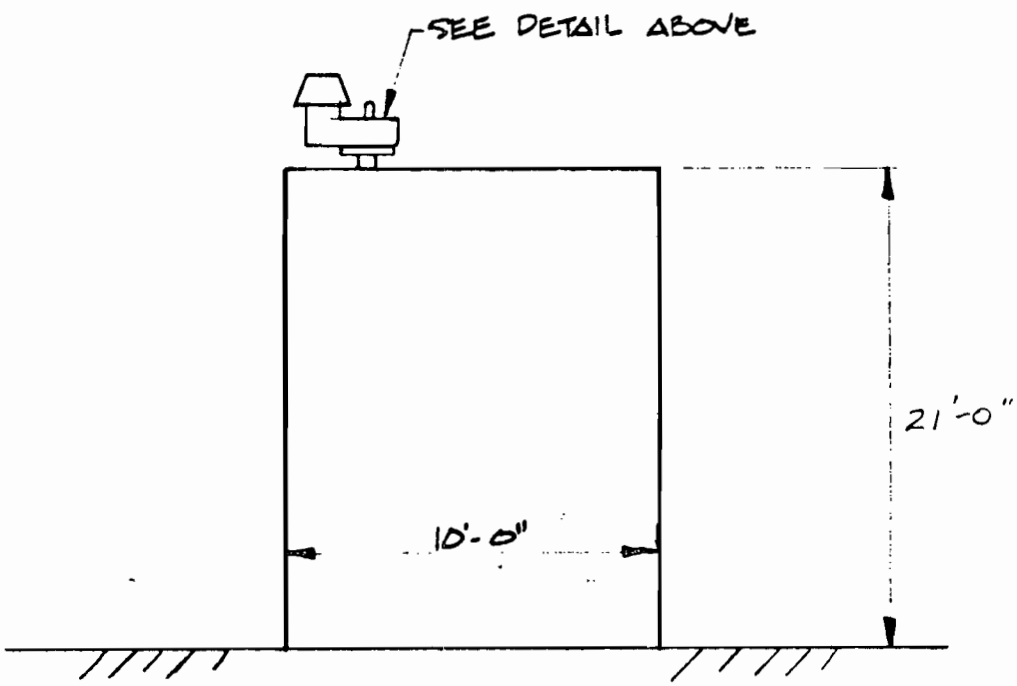
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515

302827



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.

Project REICHHOLD		Sheet
Job No. 77301	Index	3
Date 8/26/88	By DBS	of 3

AC 17-154336

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325

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A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88. Telephone No. 904-433-7621

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

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

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

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

Signed D. P. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. P. Smith
9/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 92736 which contains the solvent Butyl Cellosolve. Tank capacity is 24000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Product 92736	Butyl Cello-solve vapors	25.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 24000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Butyl Cellosolve	0.0010	0.0045	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

_____

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

Annual Average _____ Maximum _____

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

_____

_____

_____

_____

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^2* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

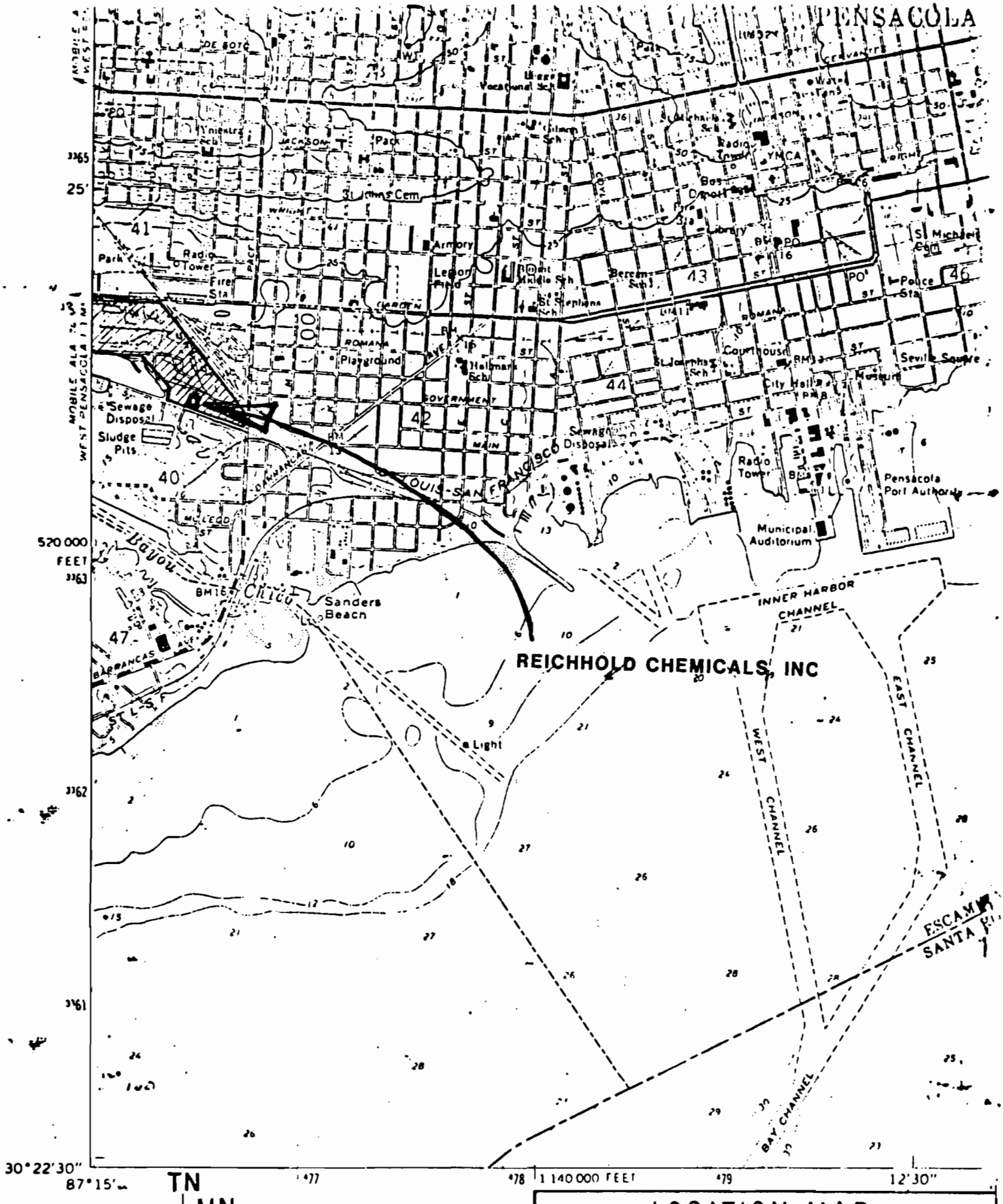
E. Emission Data Used in Modeling

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

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

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

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



TN

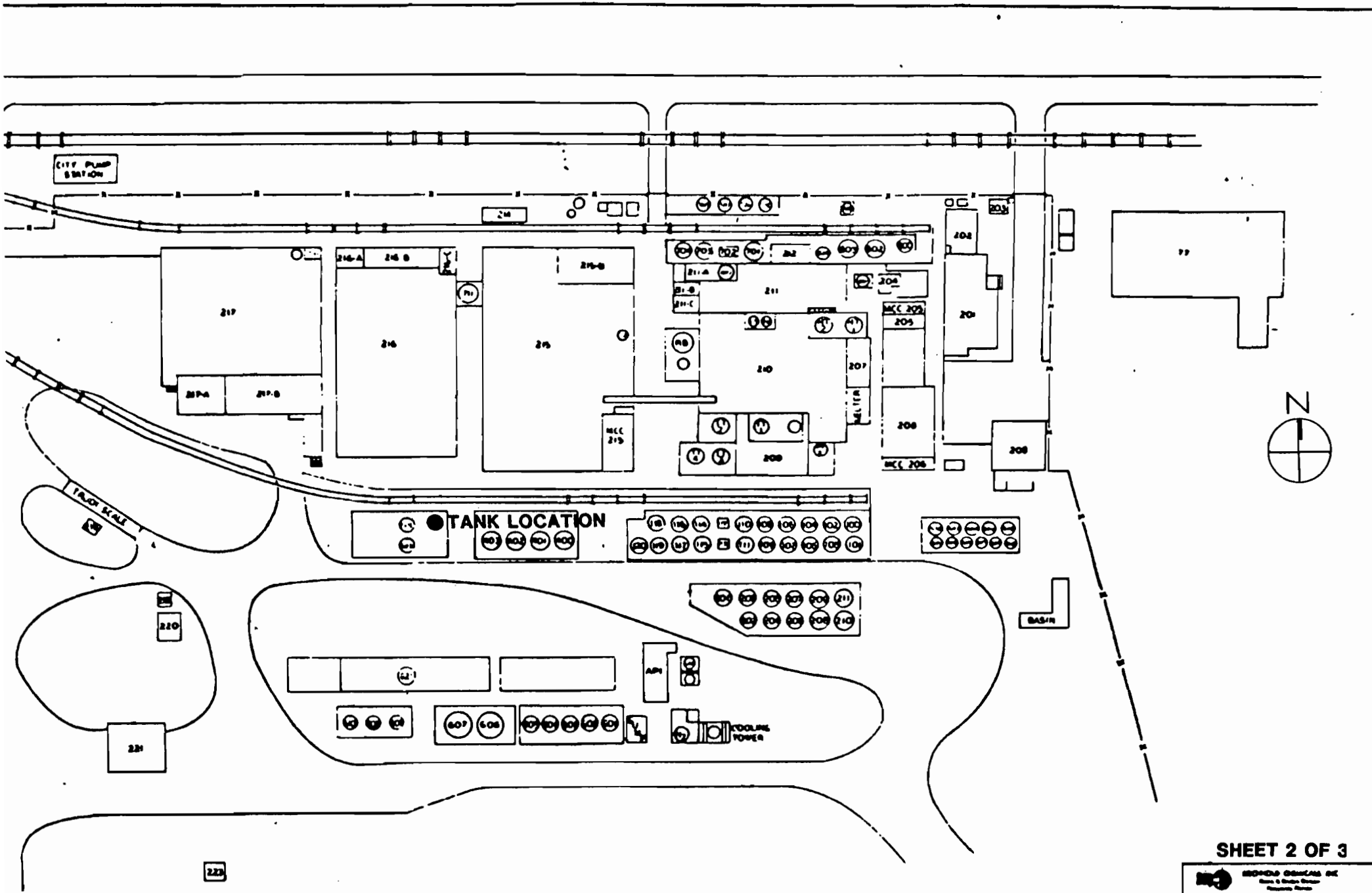
GN 0.06° MN 4°

71 MILS

Scale 1: 24,000

LOCATION MAP

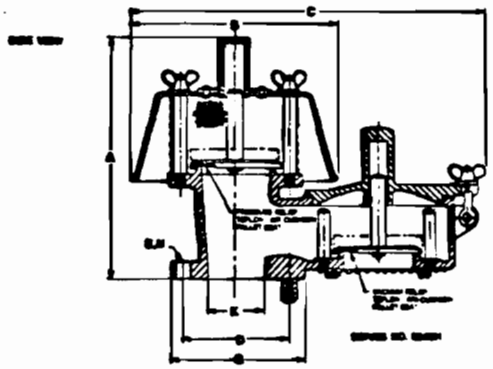
FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3

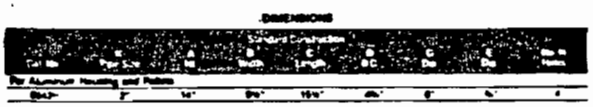


FACILITY PLAN

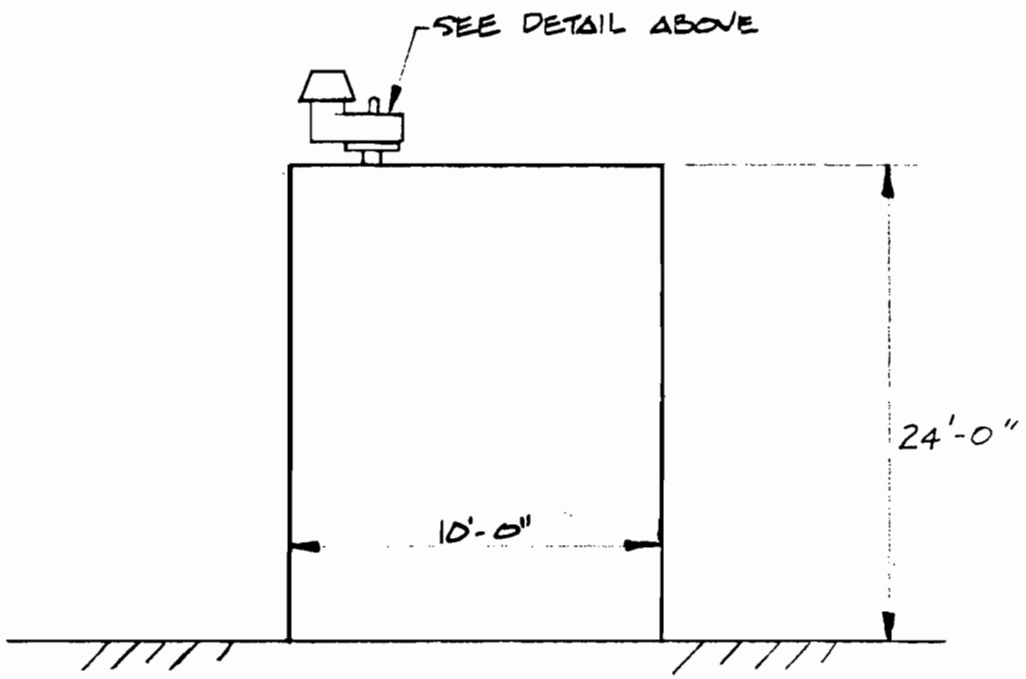
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

#100pd
AC 17-154336 9-2-88

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

RECEIVED
SEP 2 1988
DER - BAQM

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East _____ North _____

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 325[illegible]

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. PBS

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. PBS 9/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 92736 which contains the solvent Butyl Cellosolve. Tank capacity is 24000 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

M. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Product 92736	Butyl Cello-solve vapors	25.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

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

1. Total Process Input Rate (lbs/hr): Tank Capacity 24000 gallons

2. Product Weight (lbs/hr): _____

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

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Butyl Cellosolve	0.0010	0.0045	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

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

Annual Average _____ Maximum _____

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

Not Applicable

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

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

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

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

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i. Availability of construction materials and process chemicals:

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

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

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(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

Not Applicable

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

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

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

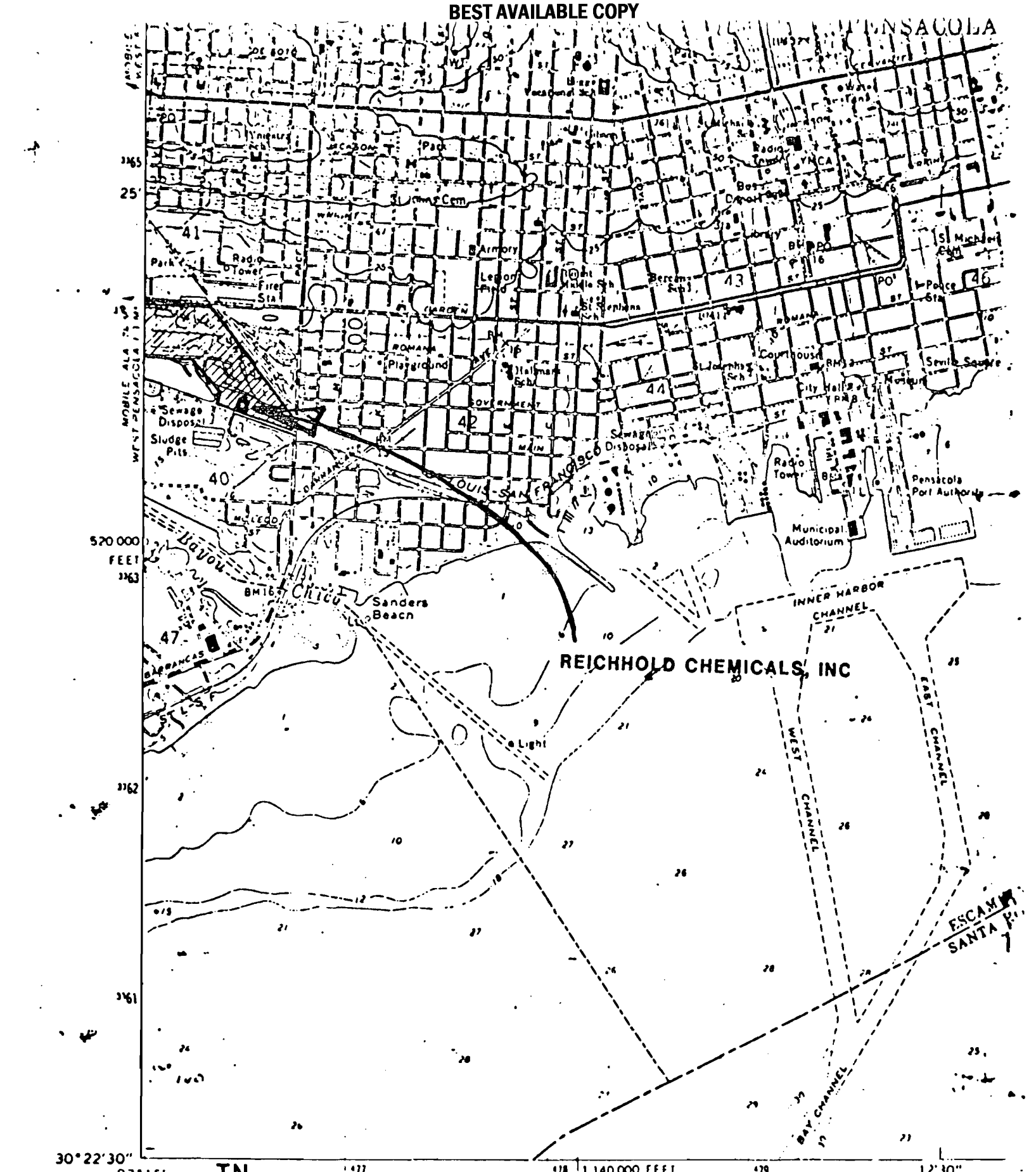
E. Emission Data Used in Modeling

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

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

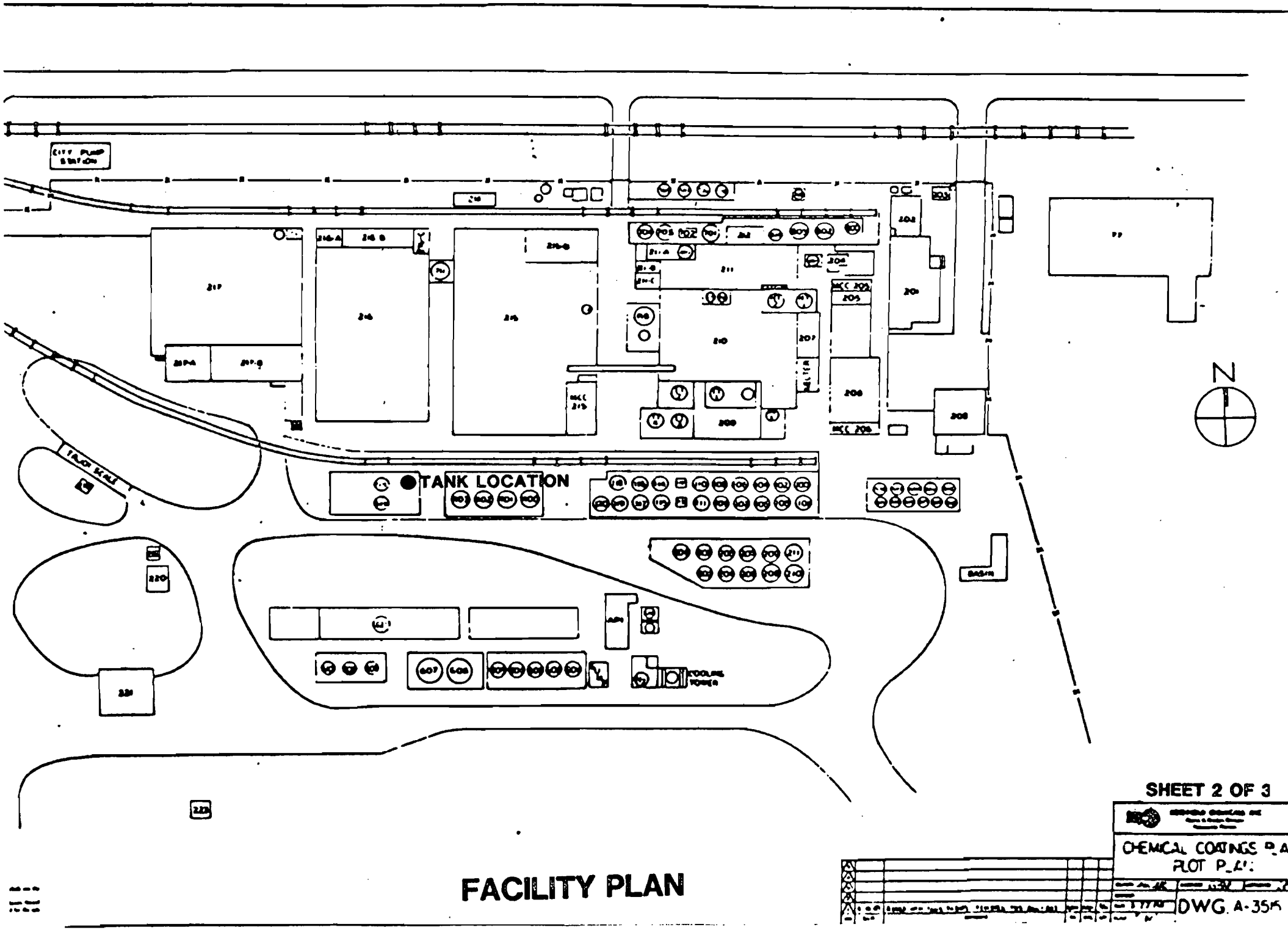
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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



LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3

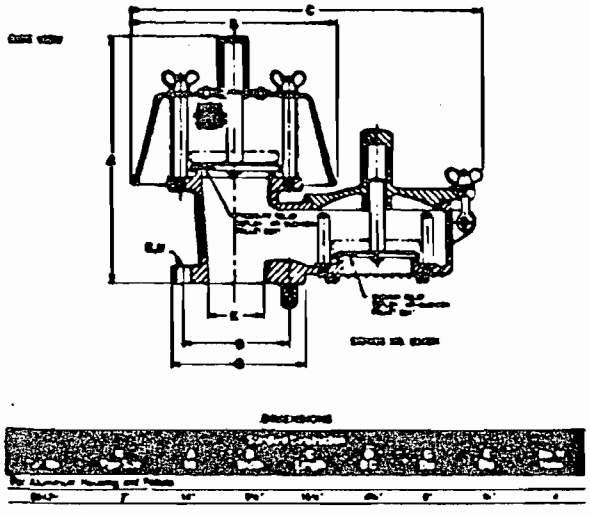


FACILITY PLAN

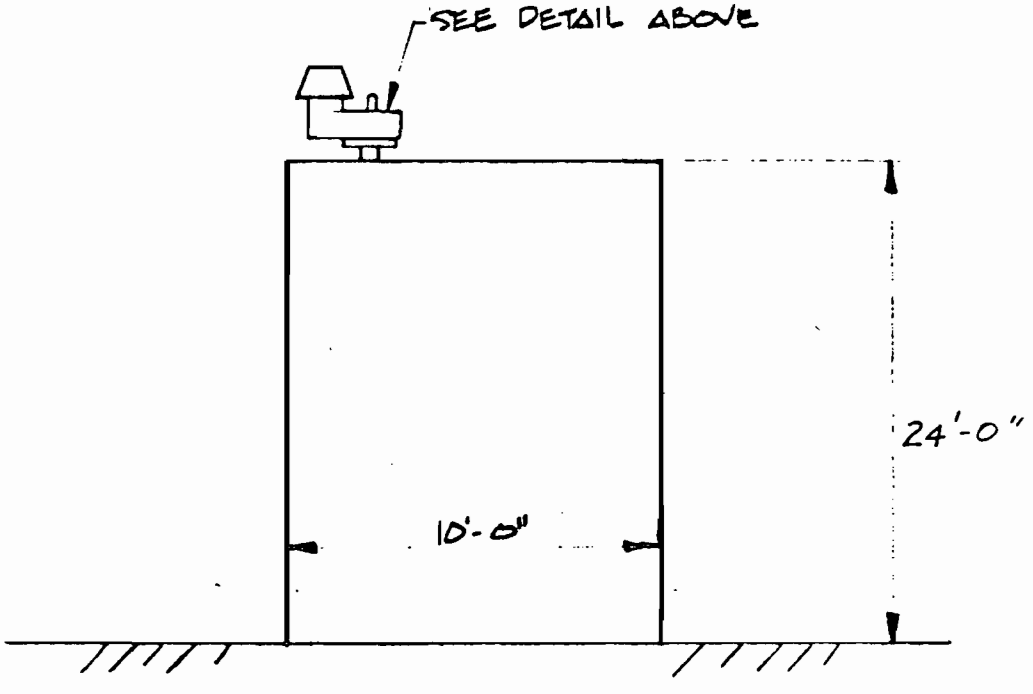
SHEET 2 OF 3

CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-355



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

AC 17-154337

$100 pd. 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 3259

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

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

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

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

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

Signed D. B. Smith

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

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

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith 8/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Pamolyn 300. Tank capacity is 12500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

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

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

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

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? NA

   a. If yes, has "offset" been applied?

   b. If yes, has "Lowest Achievable Emission Rate" been applied?

   c. If yes, list non-attainment pollutants.

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

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

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

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		
Pamolyn 300	vapors	100.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Tank Capacity 12500 gallons

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Pamolyn 300	0.0263	0.0898	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

_____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

_____

_____

_____

_____

Not Applicable

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber incluoe cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

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h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

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i. Availability of construction materials and process chemicals:

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4.

a. Control Device:

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i. Availability of construction materials and process chemicals:

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F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

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5. Operating Cost:

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8. Manufacturer:

9. Other locations where employed on similar processes:

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(3) City:

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[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

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Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

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[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

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1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
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Attach all data or statistical summaries to this application.

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a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

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[ ] Yes [ ] No [ ] Unknown

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1. _____ Year(s) of data from ____/____/____ to ____/____/____
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2. Surface data obtained from (location)_____

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2. _____ Modified? If yes, attach description.

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D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	
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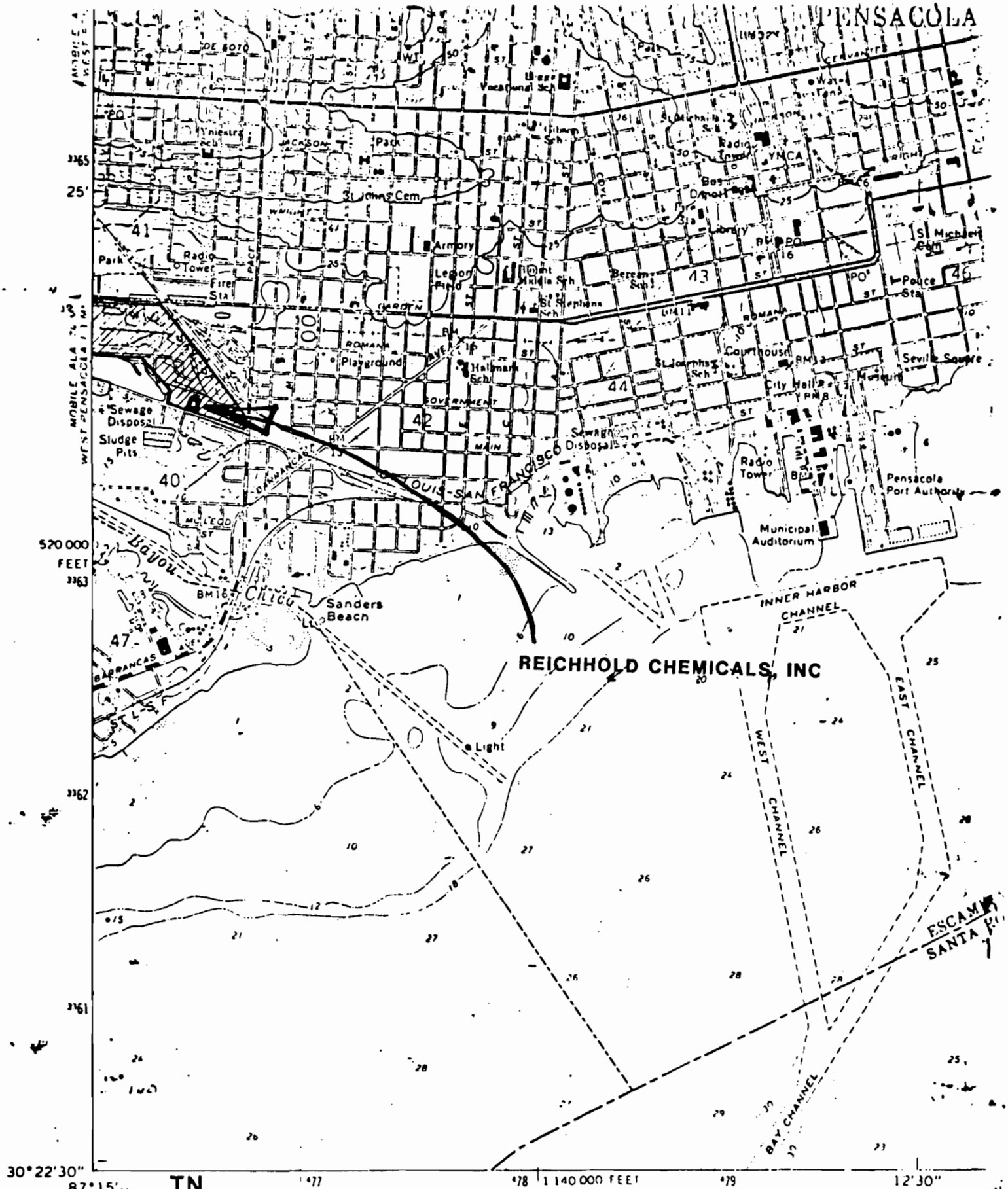
BEST AVAILABLE COPY



LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
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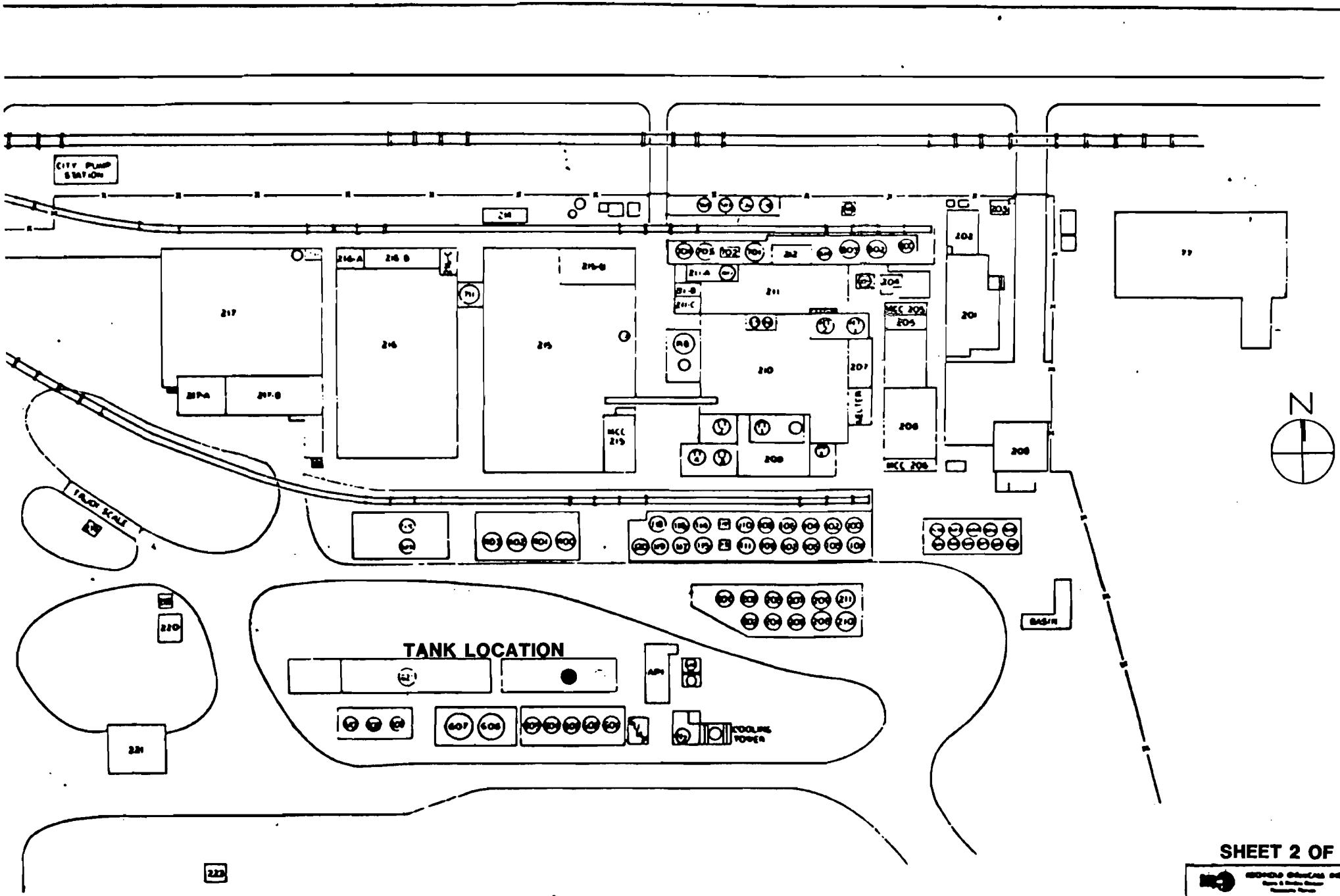
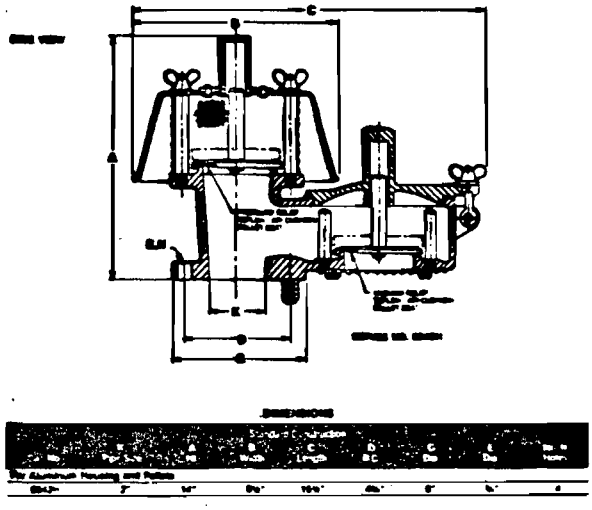


FACILITY PLAN

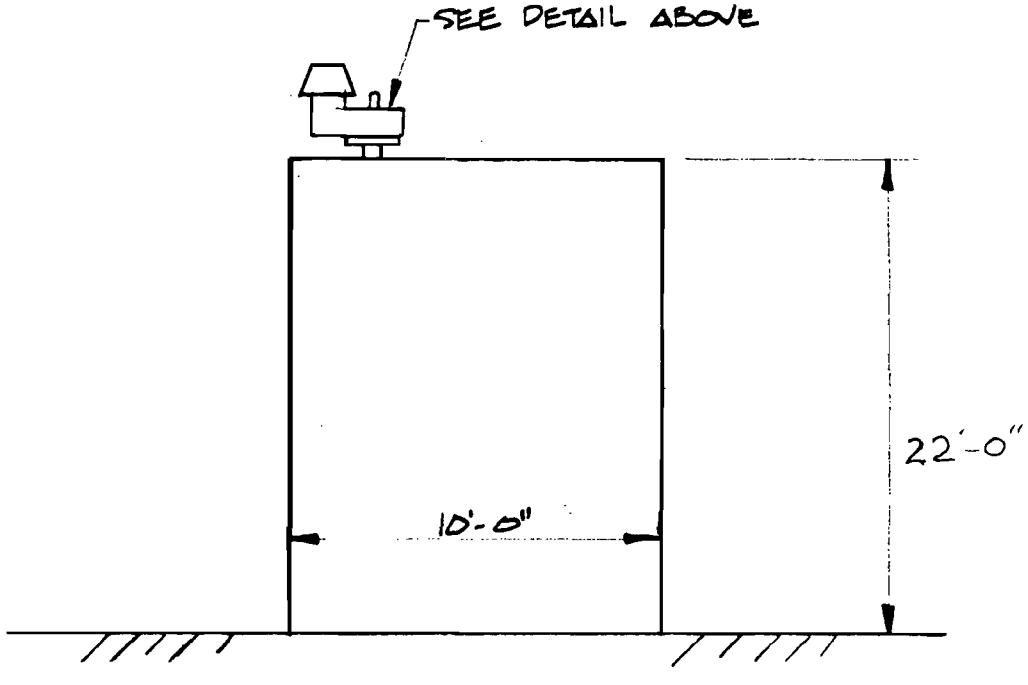
SHEET 2 OF 3

CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

#100 pd
9-2-8

AC 17-154337

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
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SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

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COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

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SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

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*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/31/88 Telephone No. 904-433-7621

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project ha been designed/examined by me and found to be in conformity with modern engineeri principles applicable to the treatment and disposal of pollutants characterized in t permit application. There is reasonable assurance, in my professional judgment, th

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the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed D. B. Smith

8/29/88

Daniel B. Smith, P.E.
Name (Please Type)

Baskerville-Donovan Engineers, Inc.
Company Name (Please Type)

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Pamolyn 300. Tank capacity is 12500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants? _____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

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		
Pamolyn 300	vapors	100.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Tank Capacity 12500 gallons

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Pamolyn 300	0.0263	0.0898	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

_____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

_____

_____

_____

_____

Not Applicable

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO^2	_____ grams/sec

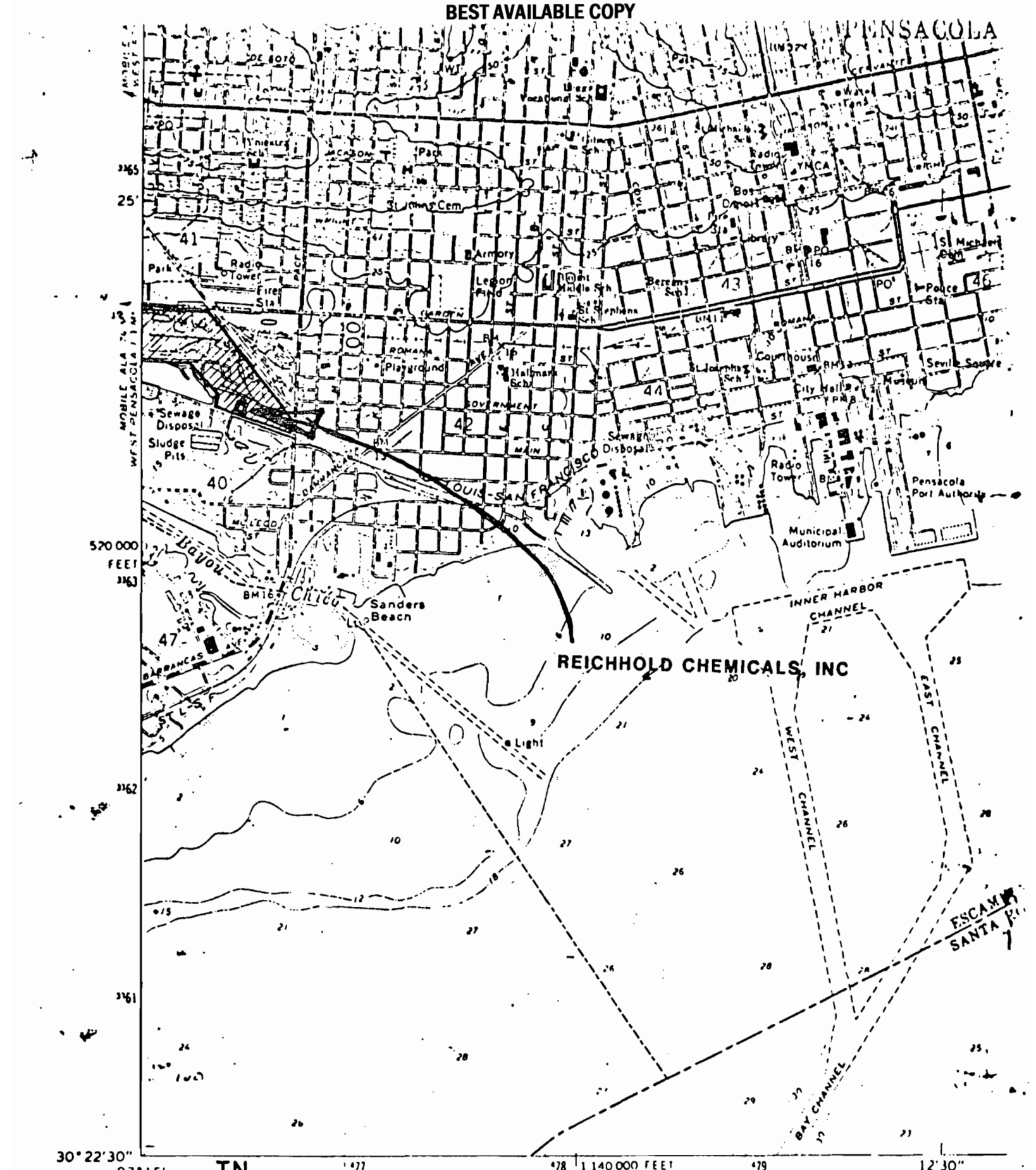
E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

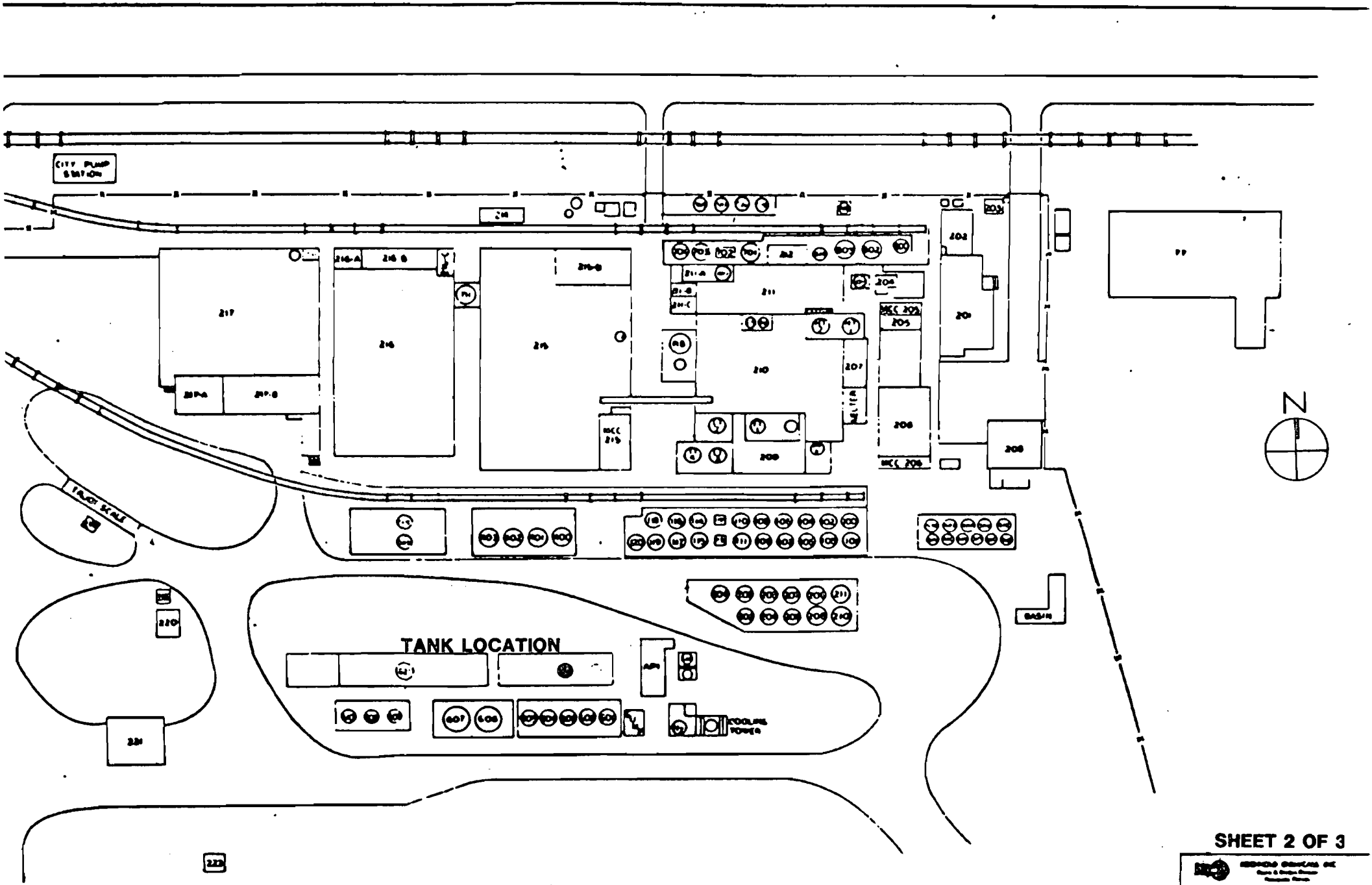
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



LOCATION MAP

FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3



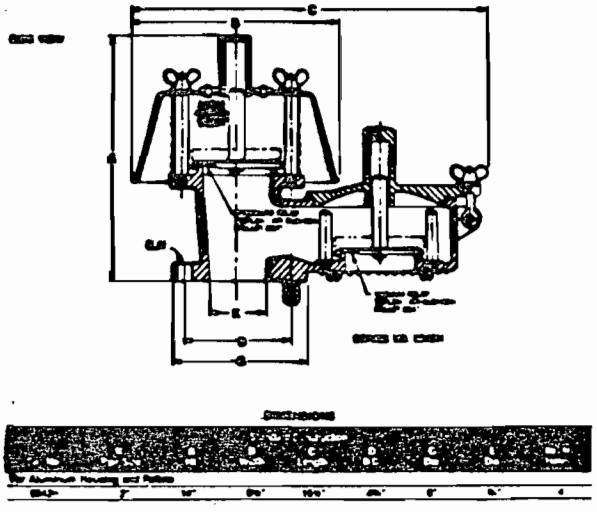
SHEET 2 OF 3

CHEMICAL COATINGS PLANT
PLOT PLAN

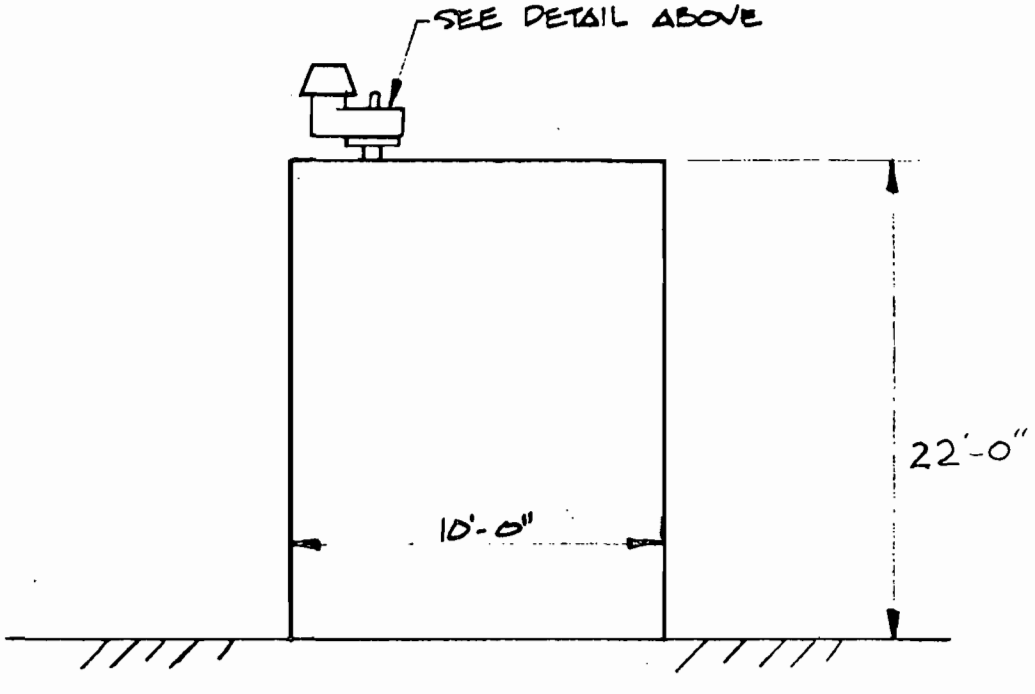
DWG. A-3515

FACILITY PLAN

302827



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

BASKERVILLE DONOVAN ENGINEERS, INC.

Project REICHHOLD		Sheet 3 of 3
Job No. 77301	Index	
Date 8/26/88	By DBS	

AC 17-154339 $100 pd 9-2-88

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ROBERT V. KRIEGEL
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing

APPLICATION TYPE: [x] Construction [ ] Operation [ ] Modification

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Tank Venting

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 3259

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project ha been designed/examined by me and found to be in conformity with modern engineeri principles applicable to the treatment and disposal of pollutants characterized in t permit application. There is reasonable assurance, in my professional judgment, th

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed D. P. B. Smith

Daniel B. Smith, P.E.
Name (Please Type)

Baskerville-Donovan Engineers, Inc.
Company Name (Please Type)

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. P. B. Smith
6/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 44429 which contains the solvent Naptha. Tank capacity is 12500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

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		
Product 44429	Naptha Vapors	25.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Tank Capacity 12500 gallons

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Naptha	0.058	0.2548	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Not Applicable

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

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

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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

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g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

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i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mail. Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

Not Applicable **SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring ____/____/____ to ____/____/____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO^2	_____ grams/sec

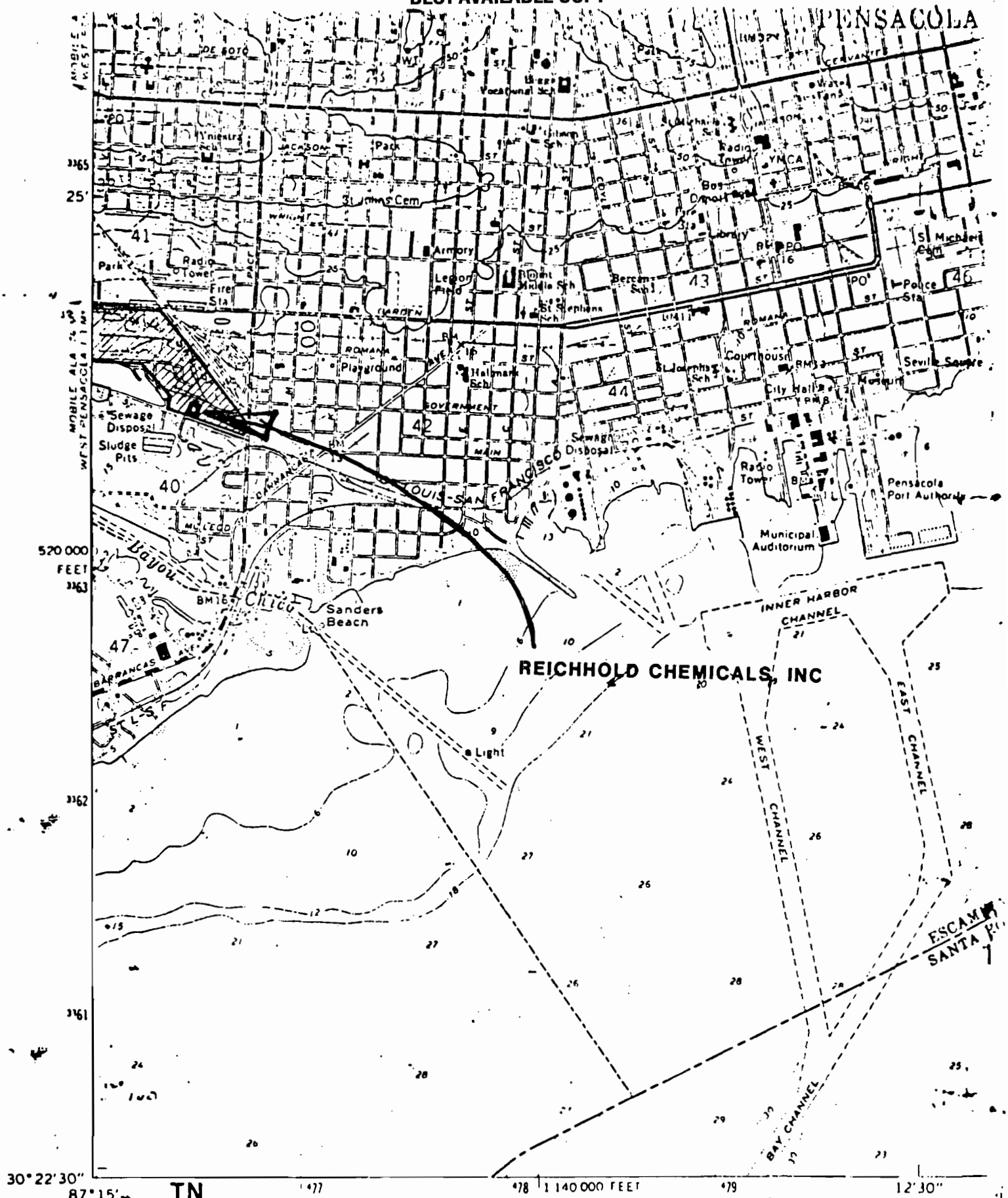
E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

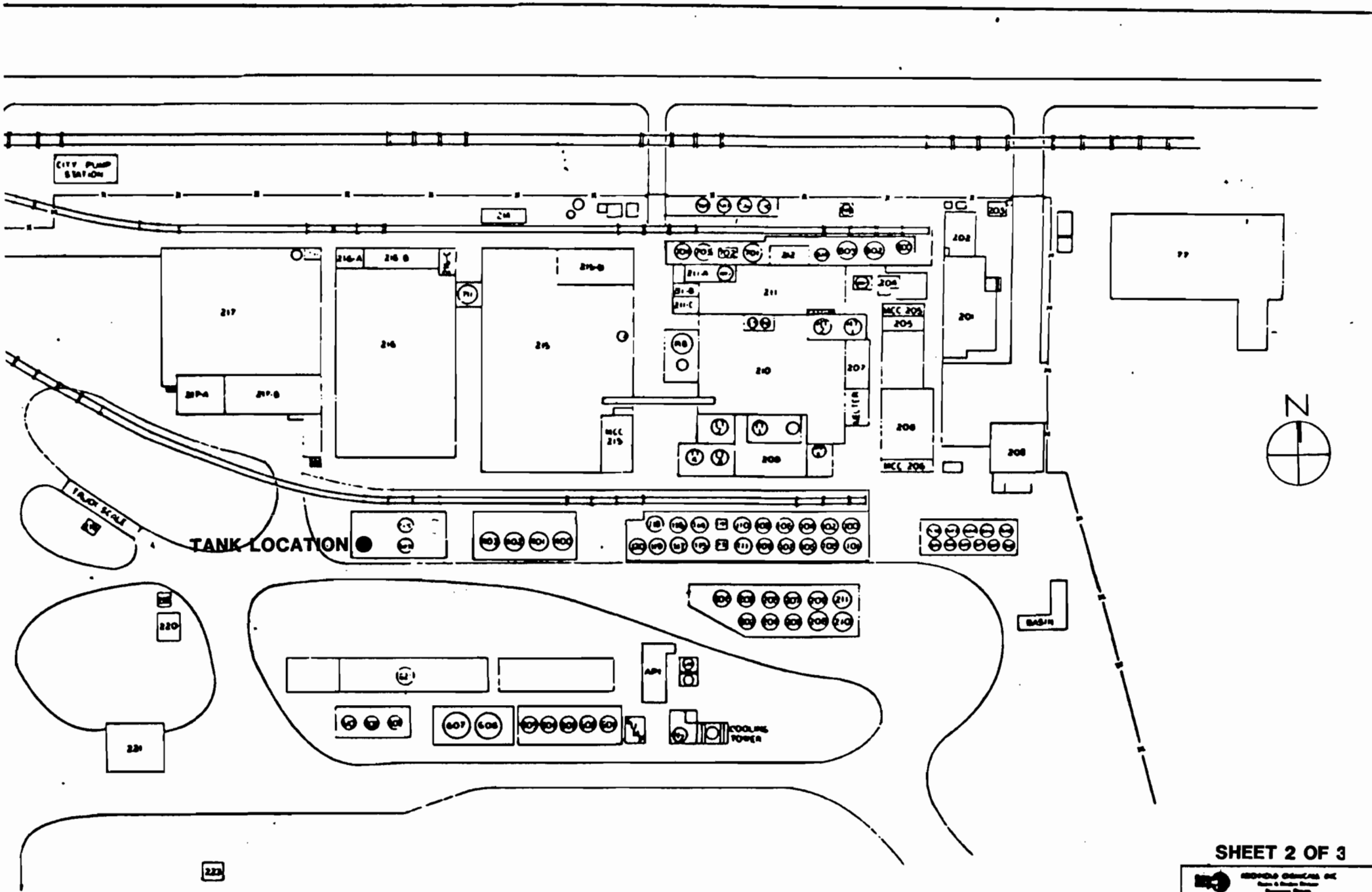


TN
GN 0°06'
MN 4°
71 MILS

Scale 1: 24,000

LOCATION MAP

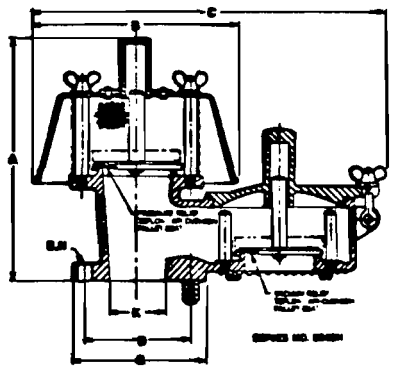
FROM U.S. GEOL. SURVEY MAP, 1970
AMS354INW – SERIES V847
REICHHOLD CHEMICALS, INC.
PENSACOLA, ESCAMBIA, FLORIDA
DEC. 21 1972 SHT 1 OF 3

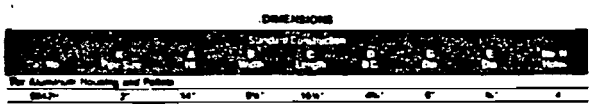


FACILITY PLAN

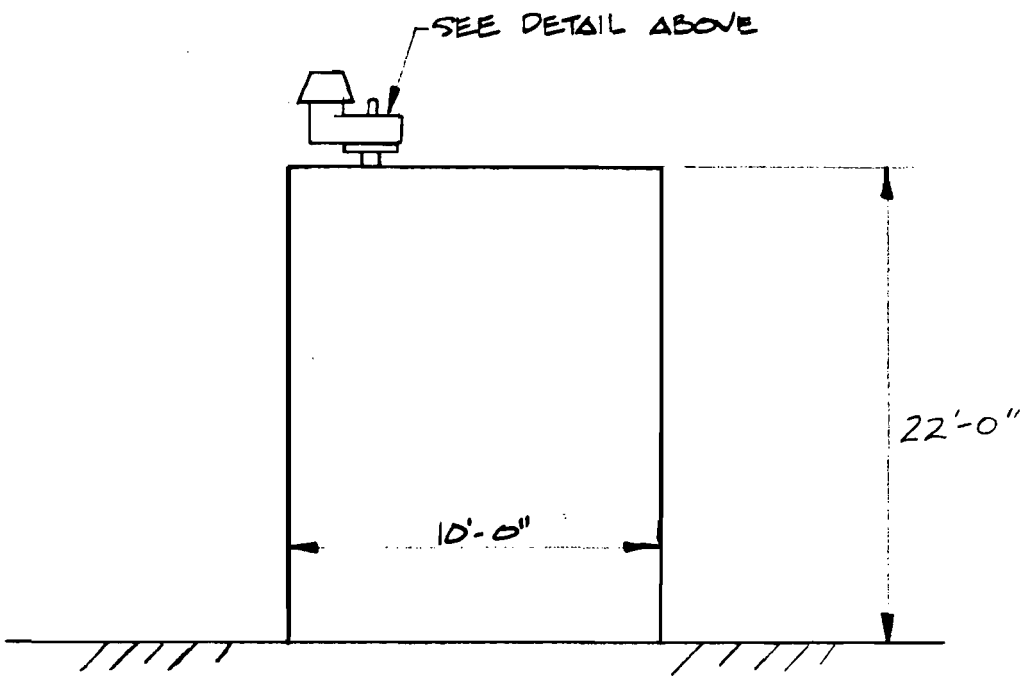
CHEMICAL COATINGS PLANT
PLOT PLAN

DWG. A-3515





CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION

$100.00 pd 9-2-88

AC 17-154339

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ROBERT V. KRIEGEL
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Above Ground Storage Tank [x] New[1] [ ] Existing[1]

APPLICATION TYPE: [x] Construction [ ] Operation [ ] Modification

COMPANY NAME: Reichhold Chemicals, Inc. COUNTY: Escambia

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Tank Venting

SOURCE LOCATION: Street 407 South Pace Boulevard City Pensacola

UTM: East North

Latitude 30 ° 24 ' 30 "N Longitude 87 ° 14 ' 40 "W

APPLICANT NAME AND TITLE: Reichhold Chemicals, Inc.

APPLICANT ADDRESS: 407 South Pace Boulevard, Post Office Box 1433, Pensacola, Florida 3259

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Reichhold

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. Furthe I agree to maintain and operate the pollution control source and pollution contr facilities in such a manner as to comply with the provision of Chapter 403, Flori Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferab and I will promptly notify the department upon sale or legal transfer of the permitt establishment.

*Attach letter of authorization

Signed: Philip P. Ulichney

Philip P. Ulichney Plant Manager
Name and Title (Please Type)

Date: 8/30/88 Telephone No. 904-433-7621

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project ha been designed/examined by me and found to be in conformity with modern engineeri principles applicable to the treatment and disposal of pollutants characterized in t permit application. There is reasonable assurance, in my professional judgment, th

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed D. B. Smith

Daniel B. Smith, P.E.
Name (Please Type)

Baskerville-Donovan Engineers, Inc.
Company Name (Please Type)

316 S. Baylen Street
Pensacola, FL 32501
Mailing Address (Please Type)

D. B. Smith 6/29/88

Florida Registration No. 35633 Date: _____ Telephone No. (904)438-9661

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction of an above ground, non-pressurized storage tank for Product 44429 which contains the solvent Naptha. Tank capacity is 12500 gallons. This tank shall be equipped with a conservative breather vent to minimize loss of volatile vapors.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 9/12/88 Completion of Construction 11/1/88

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.)

Installation cost of Model P85424A, Conservative breather vent, approximately $750.00.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

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? NA

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NA

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NA

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NA

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NA

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NA

   a. If yes, for what pollutants?_____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

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		
Product 44429	Naptha Vapors	25.0	100 GPM (fill & discharge rate of tank)	Sheet 3 of 3

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Tank Capacity 12500 gallons

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Naptha	0.058	0.2548	NA -	NA	NA		sht 3 of 3
			-				

[1]See Section V, Item 2.

[2]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)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Model P8540	Vapors	NA	NA	NA
Conservative breather				
vent (Protectoseal				
Company)				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

_____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

_____

_____

_____

_____

Not Applicable

M. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ 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: The Conservative Vent isolates the tank's vapors from the atmosphere. During working and breathing intervals the vent provides a slight (0.75 oz/sq in) positive pressure to limit volatile losses.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

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

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:[1] d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy:[2] h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device: b. Operating Principles:

c. Efficiency:[1] d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy:[2] h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:

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d. Capital Cost:

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a. Control Device:

b. Operating Principles:

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i. Availability of construction materials and process chemicals:

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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:[1]

3. Capital Cost:

4. Useful Life:

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8. Manufacturer:

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a. (1) Company:

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(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

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Contaminant	Rate or Concentration

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a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

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D. Applicants Maximum Allowable Emission Data

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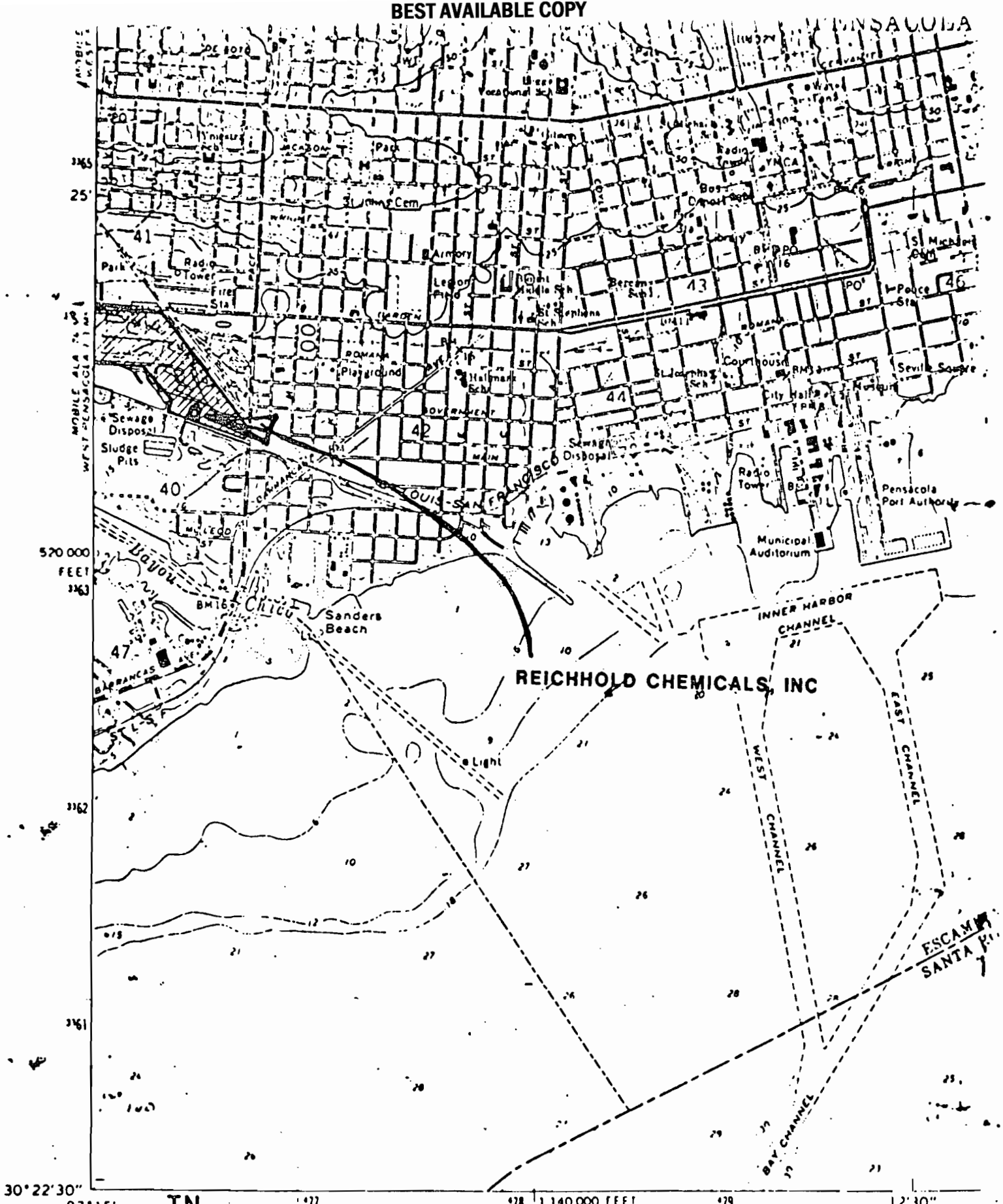

TN

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Scale 1: 24,000

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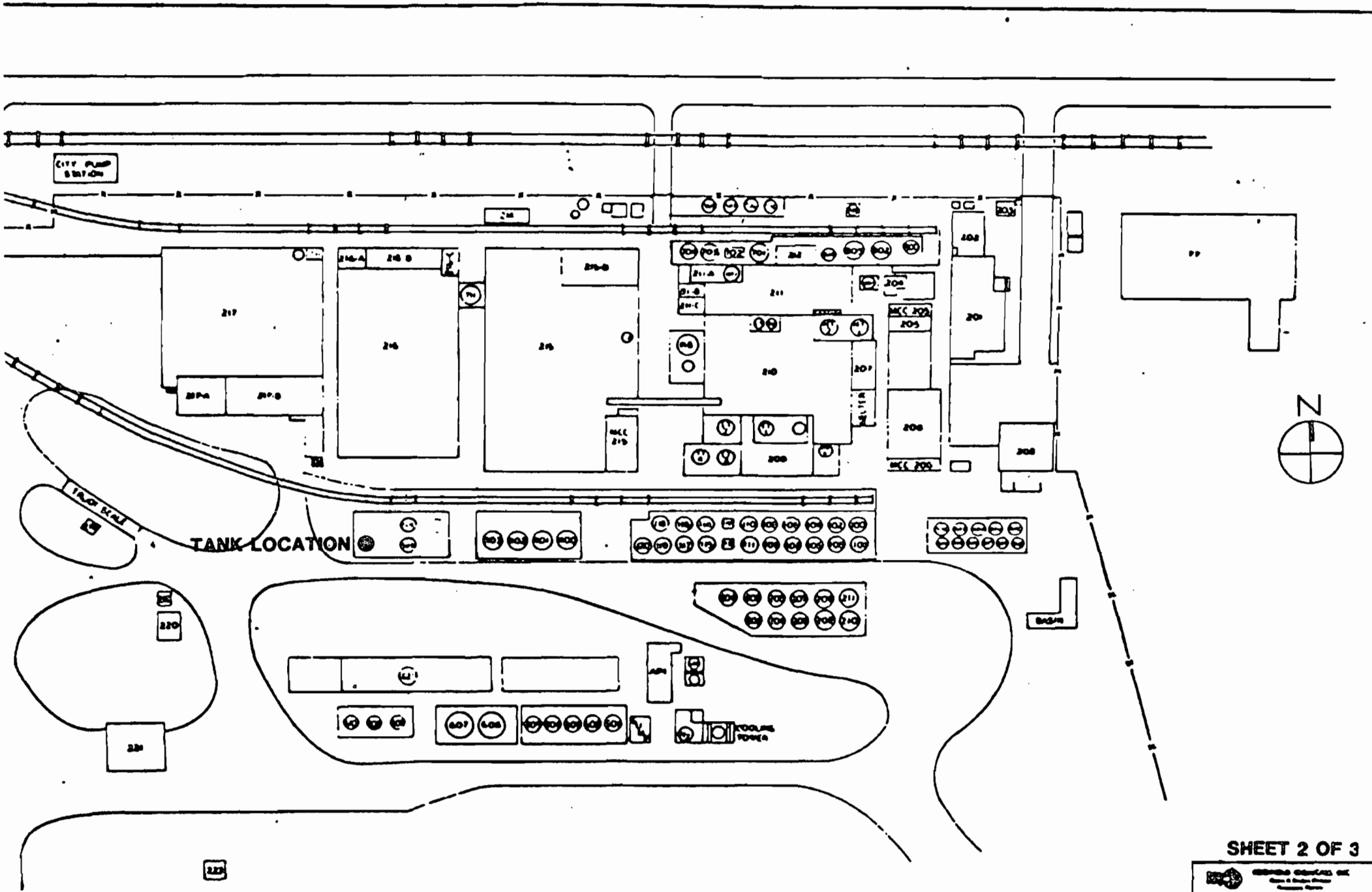


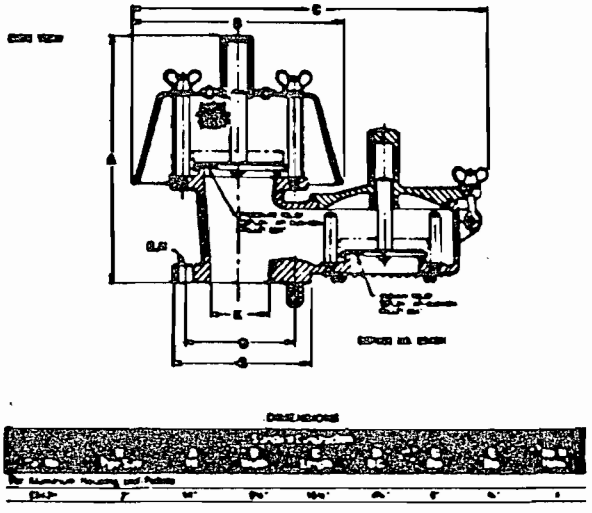
SHEET 2 OF 3

CHEMICAL COATINGS PLANT
PLOT PLAN

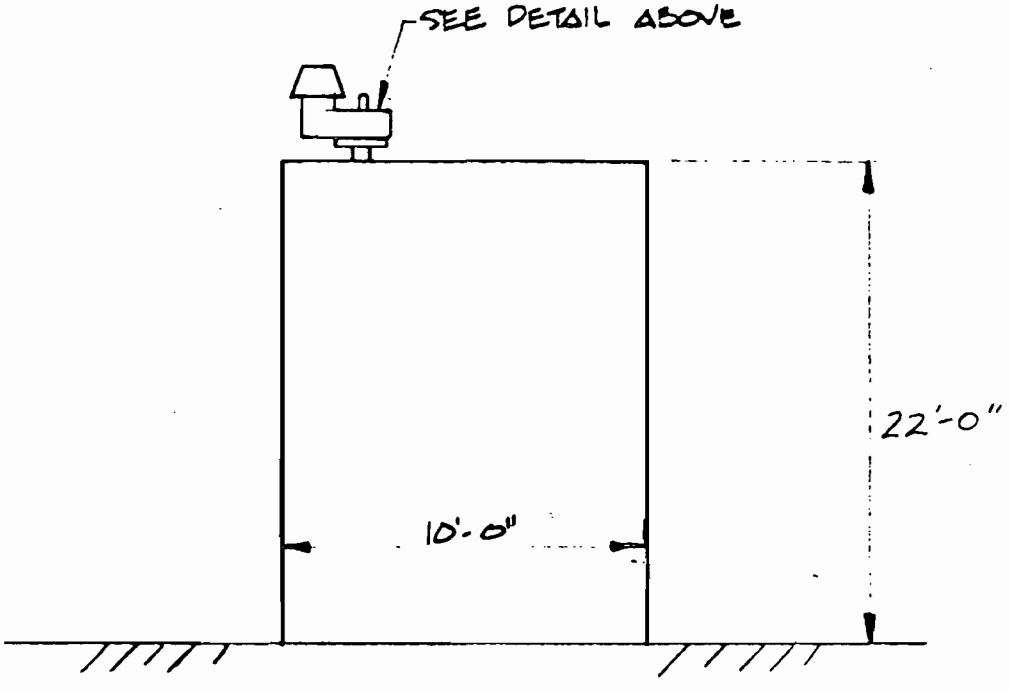
DWG. A-355

FACILITY PLAN

302827



CONSERVATION BREATHER VENT



SCHEMATIC ELEVATION