



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

FILE

David B. Struhs
Secretary

November 13, 2003

Mr. Nick Merolli
Plant Manager
Arizona Chemical
411 South Pace Boulevard
Pensacola, FL 32501-5009

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP):
Miscellaneous Organic Chemical Manufacturing

Dear Mr. Merolli:

You indicated, in the 112(j) notification that you submitted last year, that the Arizona Chemical Pensacola facility might be subject to the NESHAP (40 CFR 63 Subpart FFFF) for Miscellaneous Organic Chemical Manufacturing. You may be interested in knowing that the USEPA published the **final** NESHAP regulation for this source category in the Federal Register on November 10, 2003. Therefore, 112(j) requirements no longer apply to Miscellaneous Organic Chemical Manufacturing emissions units.

If you are interested in reading the final standards, the NESHAP and a Fact Sheet explaining the standards may be accessed through the USEPA website at

<http://www.epa.gov/ttn/atw/mon/monpg.html>.

If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or Robert.Bull@dep.state.fl.us.

“Existing” affected sources must be in compliance with Subpart FFFF standards by November 10, 2006. For the purposes of Subpart FFFF, affected sources are “existing” if construction or reconstruction of the affected source commenced before April 5, 2002. If you wish to obtain a federally enforceable state operation permit (FESOP) to limit the facility’s potential to emit hazardous air pollutants to below the major source applicability thresholds for this subpart, you must do so by November 10, 2006.

If you have any questions concerning this information, please contact me at (850)921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,

Cindy L. Phillips, P.E.
Bureau of Air Regulation

c: Sandra Veazey, FDEP-NWD

“More Protection, Less Process”



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Federal Express

BUREAU OF AIR REGULATION

PENSACOLA PLANT
411 SOUTH PACE BOULEVARD
PENSACOLA FL 32501-5009
PHONE 850 438 9222
FAX 850 438 9505

May 8, 2002

Ms. Cindy Phillips, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Ms. Phillips:

We believe our facility is currently a major source of hazardous air pollutants and is in an affected industry type source category. Accordingly, we are submitting this letter to your office and the USEPA with the following **112(j) notification information**.

- (1) Facility Name, Address and brief description of process:
Arizona Chemical
Facility ID No.: 0330126
411 South Pace Boulevard
Escambia County
Pensacola, FL 32501

We are a manufacturer of polyterpene and terpene phenolic resins with three processing areas and ancillary operations, which support the manufacturing process.

- (2) We believe we are in the Miscellaneous Organic Chemical Production and Processes industry type source category. Operations at the facility are classified under Standard Industrial Classification (SIC) code 2821 (plastics materials, synthetic resins, and nonvulcanizable elastomers).
- (3) Emission units belonging to the relevant industry type source category include:

<u>E.U. ID No.</u>	<u>Brief Description</u>
01	Nirez 1000 Polyterpene Resin Process
024	Nirez 2000 Terpene Phenolic Resin Process
023	Limonene Columns, Distillation of Chemicals
026	NSPS Storage Tanks

(4) There have been no sources identified requiring a 112(g) MACT determination.

The facility was originally constructed in 1916. The facility meets the regulatory definition of a major source for Title V purposes since the facility wide potential to emit (PTE) hazardous air pollutants is greater than 25 tons per year. The facility is a minor source for purposes of new source review since the PTE of each criteria pollutant is less than 100 TPY.

In preparation for the applicable emission standards, Arizona Chemical may determine that it can install additional air pollution controls to reduce emissions of hazardous air pollutants below the threshold for a single HAP of 10 tons per year. If Arizona Chemical pursues this avenue, Arizona Chemical would install such controls and apply for a federally enforceable air permit to eliminate the applicability of these emission standards. If you have any questions, or if you need more information, please call Tim Heintz, EHS Manager, at (850) 438-9222, extension 132.

Sincerely,



Nick Merolli
Plant Manager
Arizona Chemical