

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in the supplementary documents file drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: American Cyanamid Co.
Santa Rosa County
Permit(s) numbered: AC 57-172938

Period During Which
DOCUMENT WAS
SUBMITTED
(APPLICATION, PD & TE,
FINAL DETERMINATION,
POST PERMIT)

Application

Detailed Description

1. TANK FARM AREA " "
AN UNLOADING & STORAGE
DRAWING NUMBER E-8494

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. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Dr. Donald R. Holland Plant Manager American Cyanamid Company 1801 Cyanamid Road Milton, Florida 32571	4. Article Number P 052 482 238 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature - Address X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X 4-7-90	
7. Date of Delivery 7 APR 90	

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

P 052 482 238

RECEIPT FOR CERTIFIED MAIL

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

Sent to Dr. Donald R. Holland	
Street and No. American Cyanamid 1801 Cyanamid Road	
P.O., State and ZIP Code Milton, FL 32571	
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: 4-5-90 Permit: AC 57-172938	

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Dr. Donald R. Holland
Plant Manager
American Cyanamid Company
1801 Cyanamid Road
Milton, Florida 32571

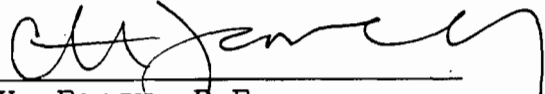
April 4, 1990

Enclosed is construction permit No. AC 57-172938 to construct an acrylonitrile vapor recovery system at your facility in Milton, Santa Rosa County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copy furnished to:

E. Middleswart, NW District
R. Bentz, P.E.

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 4-5-90.

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.

Kerri Jaker
Clerk

4-5-90
Date

Final Determination

American Cyanamid Company
Milton, Santa Rosa County, Florida

Acrylonitrile Vapor Recovery System
Permit No. AC 57-172938

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

March 30, 1990

Final Determination

The construction permit application has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Press-Gazette on February 19, 1990. The Technical Evaluation and Preliminary Determination were available for public inspection at the Department's Northwest District office in Pensacola and the Bureau of Air Regulation in Tallahassee.

No comments were received during the public notice period. Therefore, the final action of the Department will be to issue the construction permit as drafted.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Dr. Donald R. Holland
Plant Manager
American Cyanamid Company
1801 Cyanamid Road
Milton, Florida 32571

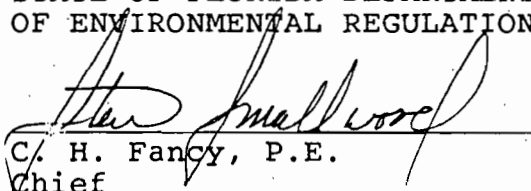
March 30, 1990

Enclosed is construction permit No. AC 57-172938 to construct an acrylonitrile vapor recovery system at your facility in Milton, Santa Rosa County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for 
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copy furnished to:

E. Middleswart, NW District
R. Bentz, P.E.



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:

American Cyanamid Co.
1801 Cyanamid Road
Milton, FL 32570

Permit Number: AC 57-172938

Expiration Date: Dec. 31, 1990

County: Santa Rosa

Latitude/Longitude: 30°34'04"N
87°06'49"W

Project: Acrylonitrile Vapor
Recovery System

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

For the construction of an acrylonitrile vapor recovery system at the permittee's Santa Rosa facility in Milton, Santa Rosa County, Florida. The UTM coordinates are Zone 17, 488.2 km E and 3381.5 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER form 17-1.202(1) received November 14, 1989.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including 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.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The acrylonitrile vapor recovery system and unloading pumps shall be allowed to operate at a maximum rate of 135 gallons per minute per connected car for up to 8760 hours per year and shall be installed so that each vapor return line must be connected to the delivery vessel in order for the acrylonitrile unloading pump to operate (F.A.C. Rule 17-2.600(13)(a)7.b.).

3. The vapor-laden delivery vessel and vapor recovery system shall be vapor-tight at all times except for periods of normal pressure/vacuum venting as required by the U.S. Department of Transportation, for maintenance inspection, or for gauging (F.A.C. Rule 17-2.600(13)(a)7.c.).

4. A vapor recovery system leak test meeting all requirements of F.A.C. 17-2.600(13)(a)7.f. and F.A.C 17-2.600(13)(a)9. shall be conducted within 30 days after operation begins and the results reported to the Department's Northwest District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the vapor recovery system being placed in operation.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

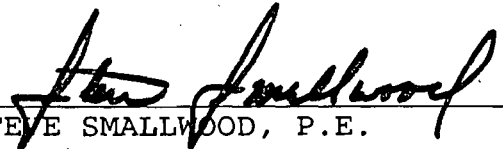
SPECIFIC CONDITIONS:

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

6. An application for an operation permit must be submitted to the Department's Northwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 3rd day
of April, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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



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 *CF*
DATE: April 2, 1990
SUBJ: Approval of Construction Permit No. AC 57-172938
American Cyanamid Co.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct an acrylonitrile vapor recovery system at the permittee's facility in Milton, Santa Rosa County, Florida.

No comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is April 6, 1990.

I recommend your approval and signature.

CF/JR/plm

Attachments

*Pat -
need notice of
Permit*

*Date April 4
Shanks*



American Cyanamid Company
Fibers Division
Santa Rosa Plant
1801 Cyanamid Road
Milton, Fla. 32570
Tel. (904) 994-5311

March 7, 1990

Mr. Clair Fancy
Florida Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: AC57-172938, Acrylonitrile Construction Permit

Dear Mr. Fancy:

Submitted herewith is proof of publication of the Department's intent to issue the subject construction permit.

Should you have any questions or wish to discuss please call.

Sincerely,

A handwritten signature in cursive script that reads 'K N Sharitz'.

K. N. Sharitz, Manager
Environmental & Regulatory Affairs

/bcm
(KNS90041)

Attachment

cc: Mr. Bill Thomas, FDER, Tallahassee
Mr. Ed Middleswart, FDER, Pensacola

The Press-Gazette

PUBLISHED WEEKLY
Milton, Santa Rosa County, Florida

STATE OF FLORIDA

County of Santa Rosa

Before the undersigned authority personally appeared _____
Angeleque M. Hill

who on oath says that he is cashier

of the Press Gazette, a weekly newspaper published at

Milton in Santa Rosa County, Florida; that the attached copy

of advertisement being a Notice of Intent to Issue

in the matter of American Cyanamid to construct

acrylonitrile vapor recovery system

in the _____ court,

was published in said newspaper in the issues of:

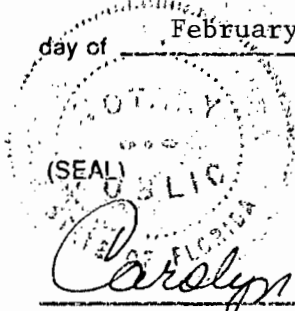
- February 19, _____ A.D., 19 90
- _____ A.D., 19
- _____ A.D., 19
- _____ A.D., 19
- _____ A.D., 19
- _____ A.D., 19

Affiant further says that the Press-Gazette is a newspaper published at Milton in said Santa Rosa County, Florida, and that said newspaper has heretofore been continuously published in said Santa Rosa County, Florida, each week and has been entered as second class mail matter at the post office in Milton in Santa Rosa 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.

Angeleque M. Hill

Sworn to and subscribed before me this _____ 19

day of February _____ 19 90



Carolyn J. Barnes

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: NOV. 12, 1990.
BONDED THROUGH NOTARY PUBLIC UNDERWRITERS.
Notary Public

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to American Cyanamid Company to construct an acrylonitrile vapor recovery system within their facility located at 1801 Cyanamid Road, Milton, Santa Rosa County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action.
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida
32501-5794

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.

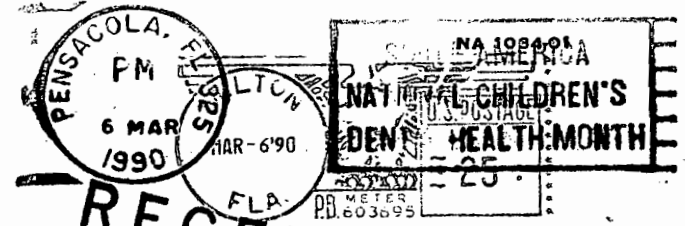
021990
021990

21516



American Cyanamid Company
1801 Cyanamid Road
Milton, FL 32570-2799

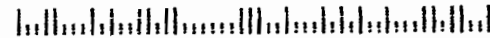
Mr. Clair Fancy
Florida Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, FL 32301-8241



RECEIVED

MAR 8 1990

DER-BAQM



DEPARTMENT OF ENVI

JOHN GUNN, 1/25/90

ROUTING AND TRANSMITTAL

1. TO: (NAME, OFFICE, LOCATION)

Patty, Jim

2.

3.

4.

PLEASE REVIEW FOR YOUR AN RULE. NEED BY TOMMOROW.

Jim P.

I believe this covers the rule's requirements. Please give me a copy of this after it's signed.

REMARKS:

As John Gunn wrote acrylonitrile rule, please have him check this out before I sign. should try to get this out tomorrow.

BILL,

1/25/90

READY FOR SEALING.

THANKS, Jim P.

Patty,

John Gunn wants a copy of the final permit.

Jim P.

ESG INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DATE 1/25

PHONE

FRI

Clair

P 938 762 816

RECEIPT FOR CERTIFIED MAIL

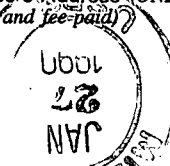
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	
Dr. Donald R. Holland, American	
Street and No.	Cyanamid
1801 Cyanamid Rd.	
P.O., State and ZIP Code	
Milton, FL 32571	
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: 1-26-90	
Permit: AC 57-172938	

PS Form 3800, June 1985

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. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Dr. Donald R. Holland Plant Manager American Syanamid Company 1801 Cyanamid Rd. Milton, FL 32571	4. Article Number P 938 762 816 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X Carlos Campbell	8. Addressee's Address (ONLY if requested and fee paid) 
6. Signature - Agent X	
7. Date of Delivery JAN 26 1990	

PS Form 3811, Mar. 1988

* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT



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 23, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Dr. Donald R. Holland
Plant Manager
American Cyanamid Company
1801 Cyanamid Road
Milton, Florida 32571

Dear Dr. Holland:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for American Cyanamid to construct an acrylonitrile vapor recovery system at the facility in Milton, Santa Rosa 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 Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/kt

Attachments

cc: E. Middleswart, NW District
R. Bentz, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

American Cyanamid Company
1801 Cyanamid Road
Milton, Florida 32571

DER File No. AC 57-172938

INTENT TO ISSUE

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

The applicant, American Cyanamid Company, applied on November 14, 1989, to the Department of Environmental Regulation for a permit to construct an acrylonitrile vapor recovery system at their facility in Milton, Santa Rosa County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required 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 Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless 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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

E. Middleswart, NW District
R. Bentz, P.E.

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 1-26-90.

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.

Kimi Jaber
Clerk

1-26-90
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to American Cyanamid Company to construct an acrylonitrile vapor recovery system within their facility located at 1801 Cyanamid Road, Milton, Santa Rosa County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

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

American Cyanamid Company
Milton, Santa Rosa County, Florida

Acrylonitrile Vapor Recovery System
Permit No. AC 57-172938

Florida Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

January 23, 1990

I. Application

A. Applicant

American Cyanamid Company
1801 Cyanamid Road
Milton, Florida 32571

B. Request

The Department received a complete application on November 14, 1989, for a construction permit to install an acrylonitrile vapor recovery piping system at the applicant's facility in Milton, Florida.

C. Location/Classification

The applicant's acrylonitrile fiber manufacturing facility (SIC Code 2824) is located approximately 18 miles northeast of Pensacola in Milton, Santa Rosa County, Florida. Latitude is 30° 34' 04"N while longitude is 87° 06' 49"W. The UTM coordinates of the site are: Zone 17, 488.2 km E and 3,381.5 km N.

II. Process Description/Emissions

It is proposed to install vapor recovery piping to return displaced vapor from three acrylonitrile storage tanks to tank cars or trucks during the acrylonitrile unloading process. Each acrylonitrile storage tank will have its own vapor return line to the unloading stations. The system will be capable of unloading two tank cars or trucks simultaneously to any one of the three acrylonitrile storage tanks at a rate of 135 gallons per minute per connected car. Each connected car will capture 1,100 cubic feet of acrylonitrile vapor from the storage tanks. Instrumentation will be provided to control the pumping rate so as not to overpressure the storage tanks resulting in venting of acrylonitrile vapor through the conservation vents. The vapor recovery system is designed for a control efficiency approaching 100% resulting in essentially no emissions.

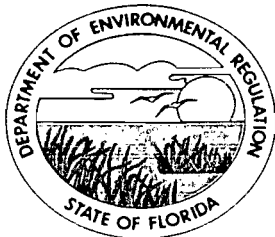
III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for each of the regulated air pollutants. Applicable rules are F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, and F.A.C. Rule 17-2.600(13)(a)7., Specific Emission Limiting and Performance Standards, Synthetic Organic Fiber Production.

IV. Conclusion

Based on the information provided by American Cyanamid Company, the Department has reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





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:
American Cyanamid Co.
1801 Cyanamid Road
Milton, FL 32570

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990
County: Santa Rosa
Latitude/Longitude: 30°34'04"N
87°06'49"W

Project: Acrylonitrile Vapor
Recovery System

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

For the construction of an acrylonitrile vapor recovery system at the permittee's Santa Rosa facility in Milton, Santa Rosa County, Florida. The UTM coordinates are Zone 17, 488.2 km E and 3381.5 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER form 17-1.202(1) received November 14, 1989.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including 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.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

GENERAL CONDITIONS:

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The acrylonitrile vapor recovery system and unloading pumps shall be allowed to operate at a maximum rate of 135 gallons per minute per connected car for up to 8760 hours per year and shall be installed so that each vapor return line must be connected to the delivery vessel in order for the acrylonitrile unloading pump to operate (F.A.C. Rule 17-2.600(13)(a)7.b.).

3. The vapor-laden delivery vessel and vapor recovery system shall be vapor-tight at all times except for periods of normal pressure/vacuum venting as required by the U.S. Department of Transportation, for maintenance inspection, or for gauging (F.A.C. Rule 17-2.600(13)(a)7.c.).

4. A vapor recovery system leak test meeting all requirements of F.A.C. 17-2.600(13)(a)7.f. and F.A.C 17-2.600(13)(a)9. shall be conducted within 30 days after operation begins and the results reported to the Department's Northwest District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the vapor recovery system being placed in operation.

PERMITTEE:
American Cyanamid Company

Permit Number: AC 57-172938
Expiration Date: Dec. 31, 1990

SPECIFIC CONDITIONS:

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

6. An application for an operation permit must be submitted to the Department's Northwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Dale Twachtman, Secretary



American Cyanamid Company
Fibers Division
Santa Rosa Plant
1801 Cyanamid Road
Milton, Fla. 32570
Tel. (904) 994-5311

RECEIVED

NOV 14 1989

DER - BAQM

RECEIVED
DER - MAIL ROOM
1989 NOV 14 PM 12: 22

November 13, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Rule Chapter 17-2.600(13)(a) FAC

Dear Mr. Glunn:

Submitted herewith are four (4) copies of Cyanamid's application for a construction permit to install vapor recovery piping for our acrylonitrile storage tanks and tank car unloading facilities in compliance with referenced regulation. Also, included is Cyanamid's check no. 21905321 in the amount of \$500.00 for permit application fee as determined from 17-4.050(4)(a) FAC.

Should you have any questions or wish to discuss please call me at 904-994-2505.

Sincerely,

K. N. Sharitz, Manager
Environmental & Regulatory Affairs

/bcm
(KNS89163)

Encl.

cc: Mr. Ed Middleswart, FDER, Pensacola
(letter only)

AMERICAN CYANAMID COMPANY
MILTON, FLA. 32570

CHECK No. 21905321 62-23
311

THIS CHECK IS IN FULL PAYMENT OF THE ITEMS LISTED BELOW.					
OUR NO.	INV. DATE	INV. NO.	GROSS AMT.	CASH DISC'T.	NET AMT.
	11-13-89	Air Pollution Source Construction Permit - Application Fee for Acrylonitrile Vapor Recovery piping.	\$500.00		

PAY →

DOLLARS	CENTS
\$500.00	

DATE 11-13-89

VOID AFTER 90 DAYS

TO THE ORDER OF

FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION
BUREAU OF AIR QUALITY MANAGEMENT
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400

AUTHORIZED SIGNATURE

Sam Spina

AUTHORIZED SIGNATURE NOT VALID UNLESS COUNTER-SIGNED IF DRAWN FOR MORE THAN \$2,500.00.

MORGAN BANK (DELAWARE)
MORGAN CHRISTIANA CENTER
500 STANTON - CHRISTIANA ROAD
NEWARK, DE 19713-2107

1989 NOV 14 PM 12:23
RECEIVED
DER - MAIL ROOM

DEPARTMENT OF ENVIRONMENTAL REGULATION

#500 pd.
11-14-89
R. apt. 1117676

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



AC57-172938

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Vapor Recovery System [] New¹ [X] Existing¹

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

COMPANY NAME: American Cyanamid Company COUNTY: Santa Rosa

Identify the specific emission point source(s) addressed in this application (i.e. Lime
See Tank Farm Area on Attached Plant Outline Map
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 1801 Cyanamid Road City Milton

UTM: East 488218 North 3381497

Latitude 30° 34' 04" N Longitude 87° 06' 49" W

APPLICANT NAME AND TITLE: Dr. Donald R. Holland, Plant Manager

APPLICANT ADDRESS: 1801 Cyanamid Road, Milton FL 32571

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of American Cyanamid

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof; I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: Dr. Donald R. Holland

Dr. Donald R. Holland, Plant Manager
Name and Title (Please Type)

Date: 13 Nov 89 Telephone No. 904/994-5311

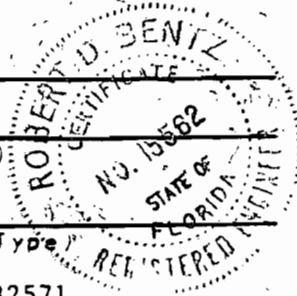
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

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

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

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

Signed Robert D. Bentz
Robert D. Bentz
Name (Please Type)
American Cyanamid Company
Company Name (Please Type)
1801 Cyanamid Road, Milton, FL 32571
Mailing Address (Please Type)



Florida Registration No. 15562 Date: 13 Nov 89 Telephone No. 904/994-5311

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.

Vapor recovery piping to return displaced vapor from acrylonitrile storage tanks to tank cars during tank car unloading. Project will result in compliance with new FDER rules for acrylonitrile. See Project Design Basis.

B. Schedule of project covered in this application (Construction Permit Application Only):
Start of Construction 18 weeks after permit approval Completion of Construction 26 weeks after permit approval

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.)

See attached Project Design Basis

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

Not Applicable

BEST AVAILABLE COPY

E. Requested permitted equipment operating time: hrs/day _____; days/wk _____; wks/yr _____
if power plant, hrs/yr _____; if seasonal, describe: ~ 80 tank cars are unloaded
per month, unloading occurs 5 days per week with 2 shifts per day. See attached
Project Design Basis

F. If this is a new source or major modification, answer the following questions.
(Yes or No) No

1. Is this source in a non-attainment area for a particular pollutant? _____
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. _____

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? _____

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? _____ No

a. If yes, for what pollutants? _____

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Acrylonitrile	Acrylonitrile	100	---	vapor returned to
vapor recovery				tank cars during
pipng				unloading

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

1. Total Process Input Rate (lbs/hr): Not Applicable

2. Product Weight (lbs/hr): Not Applicable

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

Not Applicable

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	

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

See Attached Drawing E-8494 and

D. Control Devices: (See Section V, Item 4) Project Design Basis

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Vapor return piping	Acrylonitrile	Approaching 100%	---	vapor
				returned
				to tank
				cars

E. Fuels Not Applicable

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

F. If applicable, indicate the percent of fuel used for space heating. Not Applicable

Annual Average _____ Maximum _____

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

Not Applicable

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

Not Applicable

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: Piping from
acrylonitrile storage tanks to acrylonitrile tank cars.

See attached drawing E-8494

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

Not Applicable

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

Not Applicable

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: _____

¹Explain method of determining efficiency.

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

Best Available Copy

- 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) Mailing Address:
 - (3) City:
 - (4) State:

¹Explain method of determining efficiency.

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

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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:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data / Not Applicable

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

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

Best Available Copy

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

3. 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
ISP	_____ 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.

PROJECT DESIGN BASIS AND PRELIMINARY SCOPE
AN UNLOADING VAPOR RETURN SYSTEM
EP-9732 10-24-89

1. PROJECT OBJECTIVE AND DESIGN BASIS:

Objective:

Compliance with a recent FDER rule requiring containment of AN vapor displaced from storage as a result of unloading operations. The rule requires that system design provide positive assurance that vapor containment is connected for unloading to proceed.

Design Basis

- * Unloading transfer rate to support max unloading time of 3 hr./tank car.
 - 135 GPM liquid AN transfer rate per car connected.
 - 1100 ft³ vapor per car connected.
- * Operational capability to unload two cars simultaneously to any one of the three AN storage tanks.
- * Max allowable pressure drop in vapor return piping is limited by vapor pressure that can be contained in storage tanks without lifting existing conservation vents:
 - #1 AN Storage Tank, 111-001: 3 oz/in² or 5.2 in. water.
 - #2 and #3 AN Storage Tanks, 251-2A&B: 2 oz/in² or 3.5 in. water.
 - System design pressure drop, 1.5 to 2.0 in. water at 2200 ft³/hr transfer rate.

2. PHYSICAL SCOPE AND EQUIPMENT REQUIREMENTS:

2.1 General Location

Existing Organic Tank Farm, Area A.

2.2 Scope and Materials of Construction

- * Engineering Flowsheet: E-8494, issue 2.
- * Vapor return piping, one dedicated vapor return line for each tank to car unloading stations with a car connection available at each station.
 - Elevated and long vertical sections: Sch 40 carbon steel, ASTM A53, Grade A. Assembled in flanged spools.
 - Ground level, close supported sections: Light weight carbon steel tubing, 16 ga. wall thickness, assembled in socket tube fittings, Hoffman "Smooth Flow" or equivalent.
 - Corrosion protection, epoxy primer and polyurethane top coats per established plant standards.
- * Flame arrestors at each tank connection and each car connection.
 - In line design, size commensurate to line size.
 - Stainless steel construction, 304 SS min.
 - Vendor to support flame containment capability with velocity test data.

2.2 Scope and Materials of Construction (cont'd)

- * Car connections, one at each loading station for each tank. Color coded and tagged with tank identification.
 - Hose, light weight, low pressure, non-metallic braid re-inforcement. Inner tube of teflon or polyethelene.
 - Connection valves, dry disconnect valves and cam lock adaptor, OPW "Kamvalok" or equal. Requires valve to be connected for adaptor internal valve to be opened.

- * Auxiliary connection hardware will be provided to support occasional unloading tank trucks.
 - Adaptor from vapor return hose to truck vent connection.
 - Adaptor from liquid suction connection for cars to truck connection.

- * Electrical/instrumentation interlocks, pressure switch at each tank set at 2.5-3.0 inches of water. Direct interlock with selected unloading pump, interrupts unloading when tank overhead pressure approaches conservation vent lift pressure.
 - All electrical components FM rated for Class I, Division 1, Group D service, either as explosion proof or intrinsically safe devices.

3.0 PROJECT SCHEDULE

Activity	Elapsed Time in Weeks
Engineering	8
Purchase/Bid	10
Construction	8
Startup	3
Total Elapsed Time	29

COST SUMMARY \$K

ITEM	DESCRIPTION	MAT'L	LABOR	TOTAL
1.0	ENGINEERING	0.0	16.0	16.0
2.0	CONSTRUCTION	60.0	51.0	111.0
3.0	STARTUP	0.0	3.0	3.0
	PROJECT TOTAL	60.0	70.0	130.0

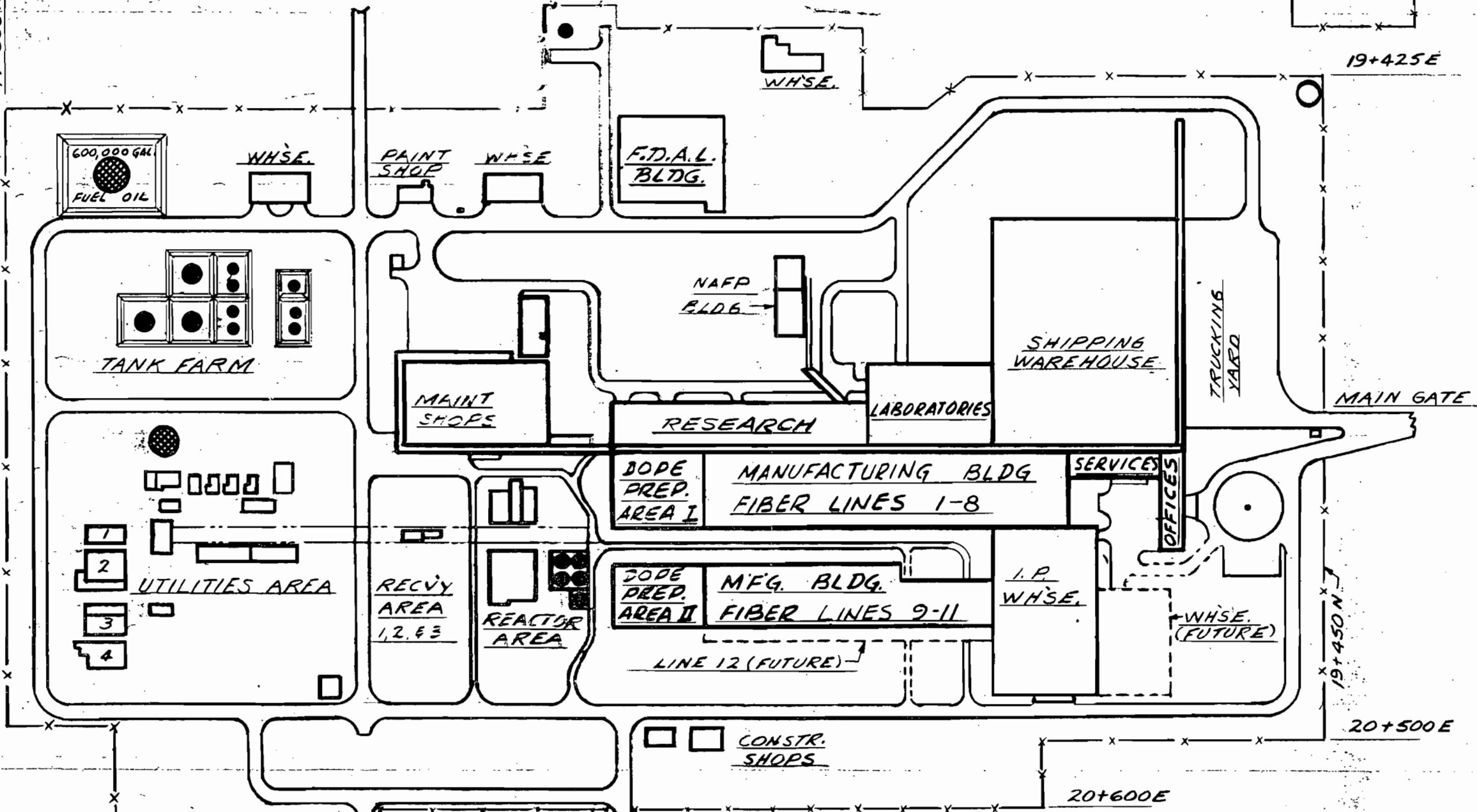


POWER
CO.
SUB-
STATION

17+300 N

19+475 E

19+425 E



EAST GATE

AMERICAN CYANAMID COMPANY
FIBERS DIVISION  SANTA ROSA PLANT

PENSACOLA, FLORIDA

DEPT. COST CENTER - EQUIP. CODE NO.

American Cyanamid Company
FIBERS DIVISION - 8/21/73 - SANTA ROSA PLANT
TOTAL PROPERTY - 1,800 ACRES APPROX.
FENCED PROPERTY - 52 ACRES APPROX.

PLANT OUTLINE MAP

DESIGN	DATE	SCALE	DWG. NO.	ISSUE
DW'G.	DATE	1"=200'	B-10179	
CK'D.	DATE			
APP'V'D.	DATE			

TOLERANCES: MATERIAL - HEAT TREATMENT & FINISH AS NOTED ON DRAWING