



Air Products and Chemicals, Inc.
Escambia Plant
4575 Highway 90 East
Pace, FL 32571
Telephone (850) 994-5511

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BUREAU OF AIR REGULATION

May 7, 2002

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
Mailstop 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Part 1 Section 112(j) MACT Application

Dear Ms. Phillips:

The Clean Air Act Amendments of 1990 require that USEPA promulgate technology-based emissions control standards for hazardous air pollutants (Maximum Achievable Control Technology (MACT) standards) by May 15, 2002 for equipment or processes in certain named source categories. It is our understanding that USEPA will miss the May 15, 2002 deadline for promulgating emissions standards for numerous source categories and therefore will trigger the statutory "MACT Hammer" under Section 112(j) of the Clean Air Act Amendments.

Under 40 CFR §§63.50-63.56 which implements the Section 112(j) regulations, facilities that are major sources of hazardous air pollutants (HAPs) and that operate emissions units that may fall within one or more of the source categories where no emission standards have been promulgated must submit a Part 1 Section 112(j) MACT Application by May 15, 2002. The Part 1 Application provides basic information about the facility and identifies the relevant source categories and types of emission points belonging to the relevant source categories at the facility. Per the Department's letter of April 5, 2002, Air Products and Chemicals Inc. ("APCI"), is submitting the following information as the Part 1 Application.

Name, Address, and Brief Description of the Major Source

APCI's Escambia Plant is located at 4575 Highway 90 in Pace, Florida. The facility is divided into two operating areas.

"Area A" manufactures ammonia and methanol from natural gas. The ammonia is used to produce nitric acid and amines. The amines area is divided into four operating facilities. Ammonia and methanol produced onsite are used as raw materials in the production of methylamines in the Methylamines Plants Numbers 1 and 4. Higher alcohols are procured and used with ammonia in the production of other amines in the Higher Amines Plant Number 2. Higher Amines Plant Number 3 consists of a 72-inch batch distillation column, which can process numerous amines and associated wastewaters. Area A also contains the boilers, which can provide steam to all process areas.

"Area B" uses ammonia and nitric acid to manufacture ammonium nitrate solutions and prills.

Identification of the Relevant Industry Type Source Categories & Emission Units

1. Subpart DDDDD: Industrial / Commercial Institutional Boilers & Process Heaters

The following list of Escambia emission units are subject to Subpart DDDDD.

- Emission Unit No. 001: Riley-Stoker Boiler
- Emission Unit No. 003: B&W Boiler
- Emission Unit No. 006: Methylamines #1 Gas-fired Heater
- Emission Unit No. 007: Higher Amines Gas-fired Heater
- Emission Unit No. 008: Ammonia Reformer
- Emission Unit No. 010: Methanol Reformer
- Emission Unit No. 060: Methylamines #4 Gas-fired Heater

3. Subpart GGGGG: Site Remediation

Per EPA, Sources must meet the following three (3) criteria to be subject to this standard:

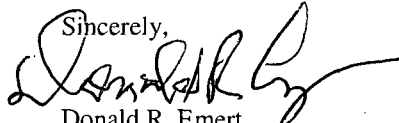
- The facility is a major source of HAP
- A MACT activity (non-remediation activity that is covered by another source category of major sources) is performed at the facility
- A remediation activity is conducted at the facility
- The source category excludes the following activities:
 - Remediation performed at gasoline stations, farm sites, and residential sites.
 - Remediation performed under CERCLA
 - Corrective action activities initiated under permits or orders, including such activities under authorized state programs, at RCRA TSDF facilities

Escambia Plant Evaluation: The Escambia Plant is currently conducting Site Remediation for Dinitrotoluene, which is listed as a HAP. As previously established, the Escambia Plant is a major source of HAP and MACT activity is performed at the facility. The site does meet the given criteria but the corrective action activities were initiated under a Consent Order, originally authored by EPA and now FDEP who was given authorization for the program. The FDEP has already approved the project's implementation plan, the design of all systems, and the operating and maintenance plan. APCI believes this would be "corrective action activities initiated under permits or orders" and therefore, this project should be classified as an exemption to this source category.

Identification of Any Affected Sources for Which a Section 112(g) MACT Determination Has Been Made.

There are no sources at APCI's Escambia Plant for which a Section 112(g) MACT determination has been made.

Please do not hesitate to call L.A. Cich at 850-995-5393 if you have any questions regarding this notification or require further information.

Sincerely,

Donald R. Emert
Plant Manager

cc: Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Other Industry Type Source Categories, Which Were Evaluated But Deemed Not Applicable

1. Subpart EEEE - National Emission Standards for Organic Liquids Distribution (OLD)

Per EPA, this MACT standard applies to the organic liquids distribution (OLD) (non-gasoline) operations, which are carried out at storage terminals, refineries, crude oil pipeline stations, and various manufacturing facilities. The regulated liquids consist of organic liquids that contain 5 percent by weight or more of the organic HAP compounds in Table 1 of the proposed subpart EEEE, and all crude oil except black oil.

Escambia Plant Evaluation: Of the sixty-nine (69) HAPs regulated by this standard, only Methanol and Triethylamine are distributed or have been distributed at the Escambia Plant. All Triethylamine has been relocated to another APCI facility. Methanol as well as Triethylamine production, storage, and transfers are already regulated by 40 CFR 63, Subpart G. Per 40 CFR 63.2338 (b)(1), APCI believes that this equipment would not also be subject to Subpart EEEE.

2. Subpart FFFF: Miscellaneous Organic NESHAPs (MON)

Per EPA, a facility is subject to the requirements of the MON if they own or operate a miscellaneous organic chemical manufacturing process unit (MCPU), which meets the following criteria:

- Is located at a major source of HAP emissions
- Uses or produces a HAP
- Is *not* part of an affected source under another subpart of 40 CFR 63

Escambia Plant Evaluation: The Escambia Plant's Methylamines Plants Numbers 1 and 4, Higher Amines Plant No. 3, and Methanol Plant are already regulated under 40 CFR 63 (HON) for the production, use and/or storage of the following organic hazardous air pollutants: methanol, dimethylformamide, and triethylamine. Hexane is an impurity in some purchased methanol used in the methylamines plant, but chemicals solely present as impurities are exempt from regulation by 40 CFR 63 (HON). Toluene is also present as an impurity in the methylamines product but is exempt from regulation by 40 CFR 63 (HON) since it exists only as an impurity. APCI does not believe any of these facilities would be subject to the MON rule because they are affected sources under 40 CFR 63 (HON).

APCI has reviewed MON applicability for the Higher Amines Plant No. 2. The facility occasionally produces cyclohexylamine, which can contain benzene as an impurity from the purchased feedstock cyclohexanol. The benzene impurity does not serve a useful purpose in the production or use of the product. Benzene is already regulated by 40 CFR 63 (HON), but chemicals solely in existence as impurities are exempt from regulation by 40 CFR 63 (HON). APCI does not believe that the MON rule would apply to this facility because the MON is not intended to apply to facilities solely because of impurities in feedstocks or products. The Higher Amines Plant No. 2 produces all amines using a catalyst that contains nickel, which is a listed HAP. Nickel can be a trace contaminant in the product, but it is not a reactant in any of the processes. APCI does not believe that the MON rule applies to these processes because the MON is intended to apply to emissions of organic hazardous air pollutants, not inorganic HAPs used as a catalyst.

The Ammonia Reformer also utilizes a catalyst containing nickel. Although nickel is part of the catalyst, it is not a reactant in the process. APCI does not believe that the MON rule applies to this process because the MON is intended to apply to emissions of organic hazardous air pollutants, not inorganic HAPs used as a catalyst.



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

May 8, 2002

Mr. Donald R. Emert
Plant Manager
Air Products and Chemicals, Inc.
Escambia Plant
4575 Highway 90 East
Pace, FL 32571

Re: 112(j) Notification Information Submittal

Dear Mr. Emert:

Thank you for submitting the referenced information in your letter dated May 7, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to this information submittal as a "Part 1 Section 112(j) MACT application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

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