



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

January 30, 1996

Brian Gebbia, Plant Manager
Air Products and Chemicals, Inc.
Post Office Box 467
Pensacola, Florida 32592-0467

Dear Mr. Gebbia:

This is in response to a request from T. R. Knepper, Air Products, dated January 17, 1996 to amend permit 1130004002AC to construct a Methanol Loading Scrubber.

By this letter, permit 1130004002AC is amended as follows:

1. The emission unit I.D. number for the methanol loading scrubber was incorrectly listed as 009. The correct emission unit I.D. number is 028.
2. The maximum allowable operating rate in Specific Condition No. 3 is listed as 42,350 (100% basis) pounds of methanol produced per hour. This is corrected to 45,315 (100% basis) pounds of methanol produced per hour.

All other Specific Conditions of permit 1130004002AC remain in effect.

This letter shall be attached to and be made part of permit 1130004002AC.

Sincerely,

Ed K. Middleswart, P.E.
Program Administrator
Air Resources Management

EKM:cm

cc: T. R. Knepper, Air Products



Department of Environmental Protection

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ENTERED
JAN 16 1996

PERMITTEE:

Air Products and Chemicals,
Incorporated

AIRS I.D. Number: 1130004
Air Permit Number: 1130004002AC
Emission Unit: ~~000~~ 028 RP
Date of Issue: January 10, 1996
Expiration Date: December 1, 1996
County: Santa Rosa
Project: Methanol Loading Scrubber

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called 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:

Construction of a Methanol Loading Scrubber to collect and recover process emissions from the methanol loading rack. There are approximately 25 tons per year of methanol emissions recovered by this scrubber.

Located south of U.S.90, east of Pace, Santa Rosa County.

ANDY,
Operating rate SC#3 was
extracted from 4057-17967
for the methanol plant
issued 7-13-90, 4057-103265,
issued 7-19-85. The operating
rate decreases as the catalyst
becomes saturated. Thus the
S.C. RICK

1130004002AC

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

PERMITTEE: AIRS I.D. Number: 1130004
Air Products and Chemicals Air Permit Number: 1130004002AC
Emission Unit: ~~009~~ 02J
Date of Issue: January 10, 1996
Expiration Date: December 1, 1996

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Construction

2. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during the life of this permit. Projects beyond one year require annual status reports. [FAC Rule 62-4.030]

Operation

3. The maximum allowable operating rate is 42,350 (100% basis) pounds of methanol produced per hour. This is the operating rate at which compliance with standards shall be demonstrated. This allowable operating rate is a function of catalyst life which varies capacity up to 10%. [FAC Rule 62-4.070, FAC Rule 62-296.320(1)(a)]

4. The Methanol Loading Scrubber may operate up to 8760 hours per year. Records of periods of methanol loading shall be kept for a minimum of five years and be made available for Department inspection. [FAC Rule 62-4.070 and construction application]

5. Methanol shall only be loaded into vapor-tight tank trucks and railcars. Records of current vapor-tightness certification in accordance with United States Department of Transportation within the last twelve months shall be kept for a minimum of five years and be made available for Department inspection. [FAC Rule 62-296.820]

6. All pressure/safety devices associated with the loading rack and scrubber system shall not operate during methanol loading. Bypass lines that could divert methanol flow away from the scrubber must be carsealed closed or equipped with a flow indicator that is checked every fifteen minutes during methanol loading. Carseal mechanisms must be visually checked monthly for proper closure. Records of flow indicator checks and/or carseal mechanism checks shall be kept for a minimum of five years and be made available for Department inspection. Each period of time when the control device is bypassed must be recorded. [FAC Rule 62-296.820]

PERMITTEE:

Air Products and Chemicals

AIRS I.D. Number: 1130004

Air Permit Number: 1130004002AC

Emission Unit: ~~009020~~

Date of Issue: January 10, 1996

Expiration Date: December 1, 1996

SPECIFIC CONDITIONS:

7. Methanol emissions shall be continuously monitored. A monitoring device (CEM) to measure pH, scrubber inlet flows or other process parameters approved by the Administrator or his designee, with a continuous recorder shall be installed, calibrated, operated and maintained according to manufacturers specifications. An operating range shall be established ensuring proper operation of the scrubber. The monitoring device (CEM) summary report shall be submitted semiannually no later than 60 calendar days after the end of the six month period. The report shall consist of but not be limited to periods the monitoring device operated outside the operating range and periods of CEM shutdown/malfunction. A performance test shall be conducted within six months of completion of construction with the Department being notified 60 days prior to testing to allow witnessing. A site specific test plan may be requested by the Department. The performance test results shall be submitted to the Department within 45 days after completion of the testing. Records of performance tests and monitoring device recorder data shall be kept for a minimum of five years and be available for Department inspection. [FAC Rule 62-296.820]

8. A scrubber startup/malfunction/shutdown plan shall be posted on site, updated and be made available for Department inspection. The plan shall include but not be limited to procedures for startup/shutdown, malfunctions and bypasses and forms for recordkeeping of startup/shutdown, malfunctions and bypasses. The initial plan shall be submitted to the Department within 90 days of completion of construction. Actions taken inconsistent with the plan shall be reported to the Department within two working days with written notification within seven days. [FAC Rule 62-296.820]

Emissions

9. Methanol emissions from the transfer operations of tanker truck loading and rail car loading must be reduced by 98% by weight or reduced to 20 ppmv, dry basis corrected to 8% oxygen, whichever is less stringent. [FAC Rule 62-296.820]

10. No objectionable odors shall be allowed off plant property. If the Department determines the facility is emitting objectionable odors, the Permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not be limited to, dispersion modeling analysis, strategies to reduce odorous chemicals utilization, and modifications of manufacturing production cycles, manufacturing methods and/or plant exhaust systems. [FAC Rule 62-296.320(2)]

PERMITTEE:

Air Products and Chemicals

AIRS I.D. Number: 1130004

Air Permit Number: 1130004002AC

Emission Unit: ~~009-028~~

Date of Issue: January 10, 1996

Expiration Date: December 1, 1996

SPECIFIC CONDITIONS:

11. Visible emissions shall not exceed 20% opacity. [FAC Rule 62-296.310(2)]

12. All fugitive dust generated at this site shall be adequately controlled. [FAC Rule 62-296.310(3)]

Testing

13. This source will be operated at its maximum permitted rate occasionally to allow the Department to determine compliance by inspection. Compliance shall be assumed if visible emissions are undetected by Department inspections.

If visible emissions are detected by Department inspection ~~is~~ ^{this} shall constitute good reason to believe that the applicable emission standard is being violated and the permittee shall conduct a visible emissions test to show compliance. The test shall be conducted in accordance with DEP Method 9. Such tests shall be conducted within 30 days after being notified of the applicability of this condition required in accordance with FAC Rule 62-297.310.

Administrative

14. An annual operation report (DEP Form 62-210.990(5)) shall be submitted by March 1st of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District, Air Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370]

15. A major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely any required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, MS5505, Tallahassee, Florida 32399-2400. [FAC Rule 62-213]

PERMITTEE:

Air Products and Chemicals

AIRS I.D. Number: 1130004

Air Permit Number: 1130004002AC

Emission Unit: ~~009-028~~

Date of Issue: January 10, 1996

Expiration Date: December 1, 1996

SPECIFIC CONDITIONS:

16. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents and submit DEP Form 62.210.900(1) for major sources and 62-210.900(2) for minor sources. The application, compliance test report and appropriate fee when required are to be submitted before the expiration of this construction permit and within 75 days after completion of construction if the permittee desires to continue operation. [FAC Rule 62-4.050 and 62-210.300]

17. The permanent ⁰²⁸⁹¹⁰ source identification number for this point source is 1130004~~009~~. Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source. [FAC Rule 62-297.570]

18. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

Issued this 10th day of JAN, 1996.

December 1, 1996

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



ED K. MIDDLESWART, P.E.
Air Program Administrator

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 403.141, 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. 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 acknowledgment 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.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are 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 this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

GENERAL CONDITIONS:

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 provide the Department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 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 62-4.120 and 62-730.300, 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. 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.

GENERAL CONDITIONS:

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.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- 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.

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 the 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.