Add a New Site

Site Name: Red Panther Chemical Company

Official / Legal Name: Red Panther Chemical Company

Air Type: ~~Federal~~ True Minor **Water Type:** Ind

HW Type: Non Gen **SW Type:**

Site General Information

ENTERED BY MCC
ON 12/16/97

County: Coahoma

Contact Name: Cain, Bobby

Contact Title: Quality Control Manager

Contact Phone: 601-627-4731

Physical Address: Normandy & Patton Streets

City, State, Zip: Clarksdale MS 38614

Mailing Address: P.O Box 550

City, State, Zip: Clarksdale Ms 38614

Owner's Name:

Owner's Address:

City, State, Zip:

Operator or Contractor Name:

Address City, State, Zip:

Site Identification Information

ECED Contact:

SIC1: 2879 **SIC2:** **SIC3:**

Air ID: 00010 5 digit ID assigned by Air Divisio

Dunn and Bradstreet Number:

ChemTreat, Inc.
HOME OFFICE: 500 LICKINGHOLE ROAD
ASHLAND, VA. 23005-3294 • (804) 798-3231

PRODUCT SAFETY DATA SHEET

SECTION I

TRADE NAME
CHEMTREAT CL-1406

CHEMICAL NAME AND SYNONYMS
Neutralized Organophosphonate, Polymer and Nonferrous Metal Corrosion Inhibitor

EMERGENCY TELEPHONE N
(804) 257-7792

SECTION II HAZARDOUS INGREDIENTS

PRINCIPAL HAZARDOUS COMPONENT(S)	CAS NO.	%	ORAL LD_{50}	DERMAL LD_{50}	TLV (Units
Potassium hydroxide	1310-58-3	<2	365 mg/kg (Rats)	>2 g/kg (Rabbits)	2 mg/m³ ACGIH & OSHA
Aminotri(methylenephosphonic acid)	6419-19-8	>1	2910 mg/kg (Rats)	>6310 mg/kg (Rabbits)	NE

SECTION III PHYSICAL DATA

BOILING POINT (°F)	>212	SPECIFIC GRAVITY (H_2O = 1) at 20°C	~1.13
VAPOR PRESSURE (mm Hg.) at 20°C	<17.5	PERCENT VOLATILE BY VOLUME (%)	~81
VAPOR DENSITY (AIR=1)	NA	EVAPORATION RATE (H_2O=1)	<1
SOLUBILITY IN WATER	Complete	pH at 20°C	~13.3

APPEARANCE AND ODOR: Straw color; mild odor.

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method Used): None

FLAMMABLE LIMITS % by Vol. — Lel: None — Uel: None

EXTINGUISHING MEDIA: Water, CO_2, Dry Chemical, Foam

SPECIAL FIRE FIGHTING PROCEDURES: Firefighters should wear full protective clothing including a NIOSH/MSHA approved self-contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Keep containers cool with water spray to minimize the potential of decomposition.

ED PANTHER CHEMCIAL CO
O BOX 550
CLARKSDALE, MS 38614

RECEIVED
JUN 17 1994
Dept. of Environmental Quality
Office of Pollution Control

Cooling Tower NESHAP Survey

Facility Name: Red Panther Chemical

Site Address: Normandy & Patton St.

City: Clarksdale State: Ms ZIP: 38614

Contact & Title: David Cdeman, Asst Gen. Mgr. Phone: 627-4731

Standard Industrial Classification Code (if known): 2879

If this facility has an air emissions permit please provide the permit number in the following space. 0540-00010

If your operation does not have an Industrial Process Cooling Tower please check here _____ , sign at the end of the survey and return it.

The following information is needed only for those operations that do have an Industrial Process Cooling Tower.

Please give the name, address, and contact for all vendors from which you obtain water treatment chemicals.

Name: Chemtreat Inc.

Contact: _____

Address: 500 Lickinghole Road

City: Ashland State: Va ZIP: 23005-3294

Name: _____

Contact: _____

Address: _____

City: _____ State: _____ ZIP: _____

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	OSHA TLV	ACGIH TLV
	NE	NE

EFFECTS OF OVEREXPOSURE

Corrosive to all tissues, eyes, skin and mucous membranes.
Persons with pre-existing skin conditions may be more susceptible to the effects of this product.

HEALTH EFFECTS

No applicable information was found on the long term health effects of this product.
Nitrilo tris (methylene phosphonic acid) has been demonstrated to have possible effects on calcium metabolism. Rats which were fed high doses of this material showed reduced weight gain and possible reproductive effects.

PRIMARY ROUTE OF ENTRY

Skin
Ingestion
Inhalation of mists

EMERGENCY FIRST AID PROCEDURE

EYES: Immediately flush eyes with plenty of water for at least 15 minutes, holding eyelids apart to ensure flushing of entire eye surface. Seek medical attention. SKIN: In case of contact immediately wash with plenty of water while removing contaminated clothing. Seek medical advice. Wash and decontaminate clothing before reuse. INGESTION: If ingested, call a physician at once. INHALATION: If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. If breathing is difficult, give oxygen. Call a physician.

SECTION VI REACTIVITY DATA

STABILITY	STABLE	√	CONDITIONS TO AVOID	None Known
	UNSTABLE			

INCOMPATABILITY (Materials to Avoid)	Strong acids, oxidizing agents and cationic polymers.
HAZARDOUS DECOMPOSITION PRODUCTS	Oxides of carbon and nitrogen.

HAZARDOUS POLYMERIZATION				CONDITIONS TO AVOID
MAY OCCUR		NO	√	None Known

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wearing appropriate protection equipment (see Section VIII), contain spill. Using an inert chemical absorbent, collect spilled material and place in a properly labeled container for disposal.

WASTE DISPOSAL METHOD

This material may be considered hazardous under RCRA 261.22 (Corrosivity Criteria). Dispose of in accordance with local, state, and federal regulations.

SECTION VI SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify Type) When TLV is exceeded, wear NIOSH approved self-contained respirator. For Example MSA Comfo II Respirator, GMC Cartridge (Yellow) TC#-23C-47, and Type F Filter TC#-21C-133.

EYE PROTECTION Chemical splash goggles	**SKIN PROTECTION** Rubber gloves, apron, and boots
VENTILATION Local exhaust	**OTHER PROTECTION** Eye wash fountain and safety shower.

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Wash thoroughly after handling. Avoid breathing mists and vapors. Do not get on skin, eyes, or clothing. Do not ingest.

OTHER PRECAUTIONS

Keep container securely closed when not in use. Label precautions also apply to empty container. Recondition or dispose of empty containers in accordance with government regulations. For industrial use only.

SECTION X MISCELLANEOUS DATA

NIF - No Information Found NA - Not Available NE - Not Established

D.O.T. Class: Compound, cleaning, liquid, Corrosive Material, NA 1760

NFPA

This product does not contain any components listed as a carcinogen by IARC, NTP, OSHA or ACGIH.

If this product contains a toxic chemical, subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372, it is listed in Section II of this Material Safety Data Sheet followed by two asterisks (**).

John A. Nygren/Technical Director

PREPARED BY John A. Nygren DATE

CL-1406

Revised Edition
February 5, 1991

ChemTreat, Inc.
HOME OFFICE: 500 LICKINGHOLE ROAD
ASHLAND, VA. 23005-3294 • (804) 798-3231

PRODUCT SAFETY DATA SHEET

SECTION I

TRADE NAME
CHEMICAL TREATMENT CL-2150

CHEMICAL NAME AND SYNONYMS
Blend of Isothiazolin's

EMERGENCY TELEPHONE NO.
(800) 424-9300
ONLY IN THE EVENT OF CHEMICAL EMERGENCIES INVOLVING A SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT INVOLVING CHEMICALS

SECTION II HAZARDOUS INGREDIENTS

PRINCIPAL HAZARDOUS COMPONENT(S)	CAS NO.	%	ORAL LD_{50}	DERMAL LD_{50}	TLV (Units)
5-chloro-2-methyl-4-isothiazolin-3-one	26172-55-4	1.15	3.81 g/kg (Rats)	>5 g/kg (Rabbits)	TWA= 0.1 mg/m³
2-methyl-4-isothiazolin-3-one	2682-20-4	.35			STEL= 0.3 mg/m³ for total isothiazolones
					Manufacturer's Recommendation

SECTION III PHYSICAL DATA

BOILING POINT (°F)	212° Estimated	SPECIFIC GRAVITY (H_2O = 1) at 20°C	~1.03
VAPOR PRESSURE (mm Hg.) at 20°C	17 Estimated	PERCENT VOLATILE BY VOLUME (%)	96
VAPOR DENSITY (AIR=1)	.62 Estimated	EVAPORATION RATE ( )	<1
SOLUBILITY IN WATER	Complete	pH at 20°C	3.0-5.0
APPEARANCE AND ODOR	Pale yellow-green liquid; mild aromatic odor.		

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method Used)	Not Applicable	FLAMMABLE LIMITS % by Vol.	Lel NAP	Uel NAP
EXTINGUISHING MEDIA	Non-Combustible			
SPECIAL FIRE FIGHTING PROCEDURES	Wear MSHA/NIOSH approved, pressure demand self-contained respirator and full protective gear. Use water spray to cool fire exposed containers.			
UNUSUAL FIRE AND EXPLOSION HAZARDS	Avoid exposure to fumes and vapors from a fire, can possibly include sulfur dioxide; hydrogen chloride and oxides of nitrogen.			

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	TWA=1 mg/m³ STEL=0.3 mg/m³	OSHA TLV	NE	ACGIH TLV	NE

EFFECTS OF OVEREXPOSURE

INHALATION: Harmful if inhaled. INGESTION: Harmful or fatal if swallowed. EYE CONTACT: Corrosive to eyes; causes irreversible eye damage. SKIN CONTACT: Corrosive to the skin; causes skin burns. These effects may be delayed for hours. Harmful if absorbed through skin; may be fatal from large exposures.

HEALTH EFFECTS

Sensitization(human): Can cause allergic contact dermatitis.
Rat aerosal inhalation: LC_{50} : 4 hr.; 23C- 1.4 mg/l males; 1.5 mg/l females; (nominal, a.i.)
Corrosive under test conditions for D.O.T. skin corrosivity.

PRIMARY ROUTE OF ENTRY

Skin and Eye Contact
Ingestion
Inhalation

EMERGENCY FIRST AID PROCEDURE EYES: Immediately flush eyes with plenty of water for at least 15 minutes, holding eyelids apart to ensure flushing of entire eye surface. Seek medical attention. SKIN: In case of contact immediately wash with plenty of water while removing contaminated clothing. Seek medical advice. Wash and decontaminate clothing before reuse. INHALATION: If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. If breathing is difficult, give oxygen. Call a physician. INGESTION: If swallowed, do not induce vomiting. Give large quantities of water. Call a physician immediately. Never give anything by mouth to an unconscious person. (Continued in Section X)

SECTION VI REACTIVITY DATA

STABILITY	STABLE	√	CONDITIONS TO AVOID
	UNSTABLE		None Known

INCOMPATABILITY (Materials to Avoid)	Strong oxidizing agents.
HAZARDOUS DECOMPOSITION PRODUCTS	Hydrogen chloride and oxides of sulfur and nitrogen.

HAZARDOUS POLYMERIZATION				CONDITIONS TO AVOID
MAY OCCUR		NO	√	None Known

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear protective clothing, splashproof goggles and impervious overshoes.
CAUTION: Keep spills out of municipal sewers and open bodies of water. Dike and absorb spill with inert material (dry earth, sand). Shovel all contaminated solids, diking material, absorbent and soil into corrosion proof drums. Seal before disposal.

WASTE DISPOSAL METHOD

For discard, this is a hazardous waste: RCRA No. D002, reportable quantity: 1 lb. (CERCLA (Superfund) Sec. 103). Landfill contaminated solids in sealed drums in accordance with local, state and Federal regulations. This material may be considered to be hazardous under RCRA 261.22 (Corrosivity Criteria).

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify Type) When exposure limits are exceeded, wear MSHA/NIOSH approved full face respirator (For Example: Wilson 1200 with either Black R21 organic vapor cartridge or Yellow R5 organic vapor/acid gas cartridge.)

EYE PROTECTION
Splashproof goggles and face shield (ANSI Z87.1 or equiv.)

SKIN PROTECTION
Impervious clothing, Rubber gloves, apron, and boots

VENTILATION
Mechanical local exhaust at point of vapor or mist release

OTHER PROTECTION
Eye-wash fountain and safety shower.

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Do not get on skin, eyes, or clothing. Do not breathe vapor or mist. Do not ingest. Wash thoroughly after handling.

OTHER PRECAUTIONS

Keep away from heat and oxidizers. Keep container securely closed when not in use. Use with adequate ventilation. Label precautions also apply to empty container. Recondition or dispose of empty containers in accordance with government regulations.

SECTION X MISCELLANEOUS DATA

NIF - No Information Found NAP - Not Applicable NE - Not Established

D.O.T. Class: Corrosive liquid, n.o.s., Corrosive Material, UN 1760

NFPA

EMERGENCY FIRST AID PROCEDURE CONT:
Note to Physician: Mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.

This material is a registered pesticide under FIFRA. Refer to container label for additional information.

This product does not contain any components listed as a carcinogen by IARC, NTP, OSHA or ACGIH.

If this product contains a toxic chemical, subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372, it is listed in Section II of this Material Safety Data Sheet followed by two asterisks (**).

John A. Nygren/Technical Director

PREPARED BY John A. Nygren DATE

CL-2150
Revised Edition
February 5, 1991

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

June 1, 1995

Mr. David Coleman
Red Panther Chemical Co.
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Title V Air Operating
Permit Program
Facility No. 0540-00010

The Title V Operating Permit program fee for 1995 will soon be due. The attached reporting form shows your source's allowable emissions as currently recorded in our files.

As provided by Section 49-17-32 of the Mississippi Code Annotated, you may elect to use either actual or allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for calculating actual annual emissions were specified in Section 49-17-30 and are listed on the attachments. If you choose the basis of actual emissions, you must submit the attached reporting form showing your inventory of emissions for the 1994 calendar year by July 1, 1995, along with the calculations and the methodology used in determining the inventory. If an inventory of emissions has not been received by July 1, 1995, the allowable emissions shown on the attached reporting form will be used as the basis for this year's assessment of fees.

This fee is due September 1st of each year. An invoice which reflects the billable emissions and amount due will be sent to you prior to September 1, 1995. If you have a billing address different from the address at which you received this letter, please indicate the correct billing address in your response. The invoice you receive will allow you to make quarterly payments if you so desire.

If you have any questions concerning this letter or the attachments, feel free to contact the Air Facilities Branch at (601) 961-5171.

Sincerely,

Wayne B. Anderson, P.E., Chief
Air Facilities Branch

WBA:sr
Attachments

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 0540 - 00010 **Date:** _____ **SIC Code:** 2879

Facility Name: Red Panther Chemical Co.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	5.03	
SO2	27.33	
NOX	0	
CO	0	
VOC*	15.65	
LEAD	0	
TRS	0	
Total HAPs (Voc)	15.65	
Total HAPs (Non-Voc)	6.2	
CFCs/HCFCs	0	
Other	0	

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

_____ _____
Signature and Title Date

Coahoma

JUN 1994 RECEIVED

RECEIVED JUN 16 1994 DEQ-OPC

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: 1993 **MDEQ Facility ID #:** 0540 - 00010 **Date:** 6/6/94 **SIC Code:** 2879

Facility Name: RED PANTHER CHEMICAL CO.

Mailing Address: P.O. BOX 550 (Street or P.O. Box) CLARKSDALE (City) MS (State) 38614 (Zip)

Site Address: NORMANDY & PATTON ST. (Street Location) CLARKSDALE (City) COAHOMA (County)

Contact and Title: DAVID COLEMAN, ASST. GENERAL MANAGER **Contact's Phone #:** (601) 627-4731

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	5.03	
SO2	27.33	
NOX	0	
CO	0	
VOC* (Methanol)	15.65	24.36 Pounds
LEAD	0	
TRS	0	
Total HAPs (Voc) (Methanol)	15.65	24.36 Pounds
Total HAPs (Non-Voc)	8.2	
CFCs/HCFCs	0	
Other	0	

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

David Coleman Asst.Gen.Mgr. — Signature and Title

6/6/94 — Date

1993 MASS BALANCE FOR METHANOL

INPUT: (BULK RECEIPTS)	=	310,760.000#
(VYDATE L) = (3,410,643.36 X .45)	=	1,534,789.512#
(FROM FORMULATIONS)		
3403F : DIAZINON L&G (19411.92 X .09)(.13)	=	227.119#
: MALATHION 5 (39,741.795 x .05)(.13)	=	25.832#
TOTAL FROM 3403F	=	252.951#
3404F : DIAZINON L&G (19411.92 X .06)(.10)	=	116.472#
MALATHION 5 (39,741.795 X .02)(.10)	=	79.484#
TOTAL FROM 3404F	=	195.956#
3409F : MALATHION 5 (39,741.795 X .025)(.14)	=	139.096#
TOTAL FROM 3409F	=	139.096#
TOTAL INPUT :	=	1,846,137.515#
OUTPUT LANNATE L : (44,706.96 X .70)	=	32,294.872#
LANNATE LV : (4,018,881.3 X .07)	=	281,321.691#
3403F : DIAZINON L&G (19411.92 X .06)(.13)	=	227.119#
MALATHION 5 (39,741.795 X .05)(.13)	=	25.832#
TOTAL FROM 3403F	=	252.951#
3404F : DIAZINON L&G (19411.92 X .06)(.10)	=	116.472#
MALATHION 5 (39,741.795 X .02)(.10)	=	79.484#
TOTAL FROM 3404F	=	195.956#
3409F : MALATHION 5 (39,741.795 X .025)(.14)	=	139.096#
TOTAL FROM 3409F	=	139.096#
VYDATE L : (3,406,463.65 X .45)	=	1,532,908.643#
TOTAL OUTPUT :	=	1,846,113.209#

TOTAL INPUT - TOTAL OUTPUT = TOTAL RELEASE (LOSS)

1,846,137.515# (TOTAL INPUT)
1,846,113.209# (TOTAL OUTPUT)]

24.307# (TOTAL RELEASE (LOSS)

Coahoma

RECEIVED
JUN 28 1993
Dept. of Environmental Quality
Bureau of Pollution Control

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385
JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: 1992 MDEQ Facility ID #: 0540 - 00010 Date: 6/23/93 SIC Code: 2879

Facility Name: RED PANTHER CHEMICAL CO.

Mailing Address: P.O. BOX 550 (Street or P.O. Box) CLARKSDALE (City) MS (State) 38614 (Zip)

Site Address: NORMANDY & PATTON STS. (Street Location) CLARKSDALE (City) COAHOMA (County)

Contact and Title: DAVID COLEMAN - QUALITY CONTROL MANAGER Contact's Phone #: (601) 627-4731

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	5.03	INSIGNIFICANT EMISSION LEVELS. <250 LBS.
SO2	27.33	0
NOX	0	0
CO	0	0
VOC*	15.85	7.769
LEAD	0	0
TRS	0	0
Total HAPs (Voc)	15.85	7.769
Total HAPs (Non-Voc)	6.2	0
CFCs/HCFCs	0	0
Other	0	0

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

QUALITY CONTROL MGR. 6/23/93

Signature and Title Date

1992 MASS BALANCE FOR METHANOL

Input: (Bulk receipts)	1,986,660.94 lbs.
(Vydate L) 563,912 gal x 8.19#/gal = 4,618,439.28 x 45% =	2,078,297.68 lbs.
From Formulations:	
3403F: Diazinon L&G(37,517.04 x .09 = 3.376.5336 x .13 =	438.95 lbs.
Dursban (37,658.16 x .03 = 1,129.7449 x .13 =	146.87 lbs.
Malathion 5(43,487.2575 x .005 = 217.4363 x .13 =	28.27 lbs.
MP 4 EC (305,766.05 x .024 = 7338.3852 x .13 =	953.99 lbs.
MP 7.2 EC(72,482.3 x .02 = 1,449.646 x .13 =	188.45 lbs.
Total from 3403F =	1,756.53 lbs.
3404F: Diazinon(37,517.04 x .06 = 2,251.0224 x .10 =	225.10 lbs.
Dursban(37,658.16 x .02 = 753.1631 x .10 =	75.32 lbs.
Malathion 5(43,487.2575 x .02 = 869.7452 x .10 =	86.97 lbs.
MP 4 EC(305,766.05 x .016 = 4,892.2568 x .10 =	489.23 lbs.
MP 7.2 EC(72,482.3 x .02 = 1,449.646 x .10 =	144.96 lbs.
Total from 3404F	1,021.58 lbs.
3409F: Malathion 5(43,487.2575 x .025 = 1,087.1811 x .14 =	152.21 lbs.
MP 7.2 EC(72,482.3 x .04 = 2,899.292 x .14 =	405.90 lbs.
Total from 3409F	558.11 lbs.
TOTAL INPUT:	4,068,294.84 lbs.
Output: Lannate L: 336,226 gal x 7.43#/gal = 2,498,159.18 x .70 =	1,748,711.43 lbs.
Lannate LV: 382,655 gl x 8.52#/gal = 3,260,220.6 x .07 =	228,215.44 lbs.
3403F: Diazinon L&G(37517.04 x .09 = 3,376.5336 x .13 =	438.95 lbs.
Dursban(37,517.04 x .03 = 1,129.7449 x .13 =	146.87 lbs.
Malathion 5(43,487.2575 x .005 = 217.4363 x .13 =	28.27 lbs.
MP 4 EC(305,766.05 x .024 = 7,338.3852 x .13 =	953.99 lbs.
MP 7.2 EC(72,482.3 x .02 = 1,449.646 x .13 =	188.45 lbs.
Total from 3403F	1,756.53 lbs.

3404F: Diazinon L&G(37,517.04 x .06 =		
2,251.0224 x .10 =		225.10 lbs.
Dursban(37,658.16 x .02 =		
753.1631 x .10 =		75.32 lbs.
Malathion 5(43,487.2575 x .02 =		
869.7452 x .10 =		86.97 lbs.
MP 4 EC(305,766.05 x .016 =		
4,892.2568 x .10 =		489.23 lbs.
MP 7.2 EC(72,482.3 x .02 =		
1,449.646 x .10 =		144.96 lbs.
Total 3404F		1,021.58 lbs.
3409F: Malathion 5(43,487.2575 x .025 =		
1,087.1811 x .14 =		152.21 lbs.
MP 7.2 EC(72,482.3 x .04 =		
2,899.292 x .14 =		405.90 lbs.
Total 3409F		558.11 lbs.
Vydate L: 565,423 gal x 8.15#/gal =		
4,608,197.45 x .45 =		2,073,688.85 lbs.
TOTAL OUTPUT		4,053,951.94 lbs.

Input = Output
4,068,294.84 = 4,053,951.94
Differnce = 14,342.90 lbs (.35%) loss

1992 MASS BALANCE FOR XYLENE

PROCESSED

INPUT:Diazinon L&G:

T500 [4,737 gal x 7.92#/gal = 37,517.04 x .5597 = 20,998.2873 x .20] = 4,199.66 lbs. +

3403F[37,517.04 x .09 = 3,376.5336 x .15] = 506.48 lbs. +

3404F[37,517.04 x .06 = 2,251.0224 x .15] = 337.65 lbs.

Total in Diazinon L&G 5,043.79 lbs.

Dursban 1:

T500 [4,878 gal x 7.72#/gal = 37,658.16 x .8205 = 30,898.52028 x .20] = 6,179.71 lbs. +

3403F[37,658.16 x .03 = 1,129.7449 x .15] = 169.46 lbs. +

3404F[37,658.16 x .02 = 753.1632 x .15] = 112.97 lbs. +

Dursban Tech[37,658.16 x .2106 = 7,930.8085 x .375] = 2,974.05 lbs.

Total in Dursban 1 9,436.19 lbs.

Malathion 5 EC:

T500 [4,905.5 gal x 8.865#/gal = 43,487.2575 x .3337 = 14,511.6978 x .20[= 2,902.34 lbs. +

3403F [43,487.2575 x .005 = 217.4363 x .15] = 32.62 lbs. +

3404F [43,487.2575 x .02 = 869.7452 x .15]= 130.46 lbs. +

3409F [43,487.2575 x .025 = 1,087.1814 x .11] = 119.59 lbs.

Total in Malathion 5 EC 3,185.01 lbs.

Methyl Parathion 4 EC:

Aromatic 100 [34,865 gal x 8.77#/gal = 305,766.05 x .3901 = 119,279.3361 x .03] = 3,578.38 lbs. +

3403F[305,766.05 x .0240 = 7,338.39 x .15] = 1,100.76 lbs. +

3404F [305,766.05 x .016 = 4,892.2568 x .15] = 733.84 lbs. +

Methyl Technical [305,766.05 x .5699 = 174,256.0719 x .18] = 31,366.09 lbs. +

Total in Methyl Parathion 4 EC 36,779.07 lbs.

INPUT (cont)

Methyl Parathion 7.2 EC:	
Aromatic 100 [7,205 gal x 10.06#/gal = 72,482.3 x .0241 = 1,746.8234 x .03] =	52.40 lbs. +
3404F[72,482.3 x .02 = 1,449.646 x .15] =	217.45 lbs. +
3403F[72,482.3 x .02 = 1,449.646 x .15]=	217.45 lbs. +
3409F[72,482.3 x .04 = 2,899.292 x .11]=	318.92 lbs. +
Methyl Para. Tech (72,482.3 x .8959 = 64,936.8926 x .18] =	11,688.64 lbs.
Total in Methyl Parathion 7.2. EC	12,494.86 lbs.
TOTAL PROCESSED XYLENE INPUT	66,938.92 lbs.
PLUS INPUT FROM REPACKAGE:	
Asana Bulk: 3,700,778.7 x .03 =	111,023.36 lbs.
Fruit Tree Spray: 2,240.44 x .353 =	790.88 lbs.
TOTAL XYLENE INPUT	178,753.16 lbs.

OUTPUT:

Diazinon L&G [37,517.04 x .11] =	4,126.87 lbs. +
Dursban 1:[37,658.16 x .228] =	8,586.06 lbs. +
Malathion 5 EC [43,487.2575 x .0495] =	2,152.62 lbs. +
Methyl 4 EC [(305,766.05 x .0585 = 17,887.3139)+ (305,766.05 x .1026 = 31,371.5967) =	49,258.91 lbs. +
Methyl 7.2 EC [72,482.3 x .024] =	1,739.58 lbs.
TOTAL PROCESSED OUTPUT:	65,864.04 lbs.
PLUS OUTPUT FROM REPACKAGE:	
Asana: 3,693,850.4 x .03 =	110,815.51 lbs.
Fruit Tree Spray: 2,485.62 x .353 =	877.42 lbs.
TOTAL XYLENE OUTPUT	177,556.97 lbs.

INPUT + OUTPUT
178,753.16 = 177,556.97 lbs
Difference = 1,196.19 lbs (.67%)loss

MANUFACTURING PROCESS OPERATIONS

Company Name	Address	FOR AGENCY USE
Red Panther Chemical Company	Normandy & Patton Streets P.O. Box 550 Clarksdale, MS 38614	

FACILITY NUMBER	Information for Calendar Year	Date
0540	19 92	

Reference Number	Process or Unit Operation Name	Rated Process Capacity Tons/Hour	Feed Input		Number of Emission Points To Air	Product Output*	
			Quantity Per Hour	Quantity Per Year		Quantity Per Hour	Quantity Per Year
WP-1	Powder Mfg. Unit #1 (Building #8)	0.25	500 lb.	3.0 M	One	500	3.0 M
WP-1a	Powder Mfg. Unit #1a (Building #9)	0.25	500 lb.	3.0 M	One	500	3.0 M
WP-2	Powder Mfg. Unit #2 (Building #11)	0.50	1000 lb.	6.0 M	One	1000	6.0 M
WP-3	Powder Mfg. Unit #3 (Building #2)	0.25	500 lb.	3.0 M	One	500	3.0 M
LI-1	Liquid Insecticide Plant (Buildings #3 & #4)	0.10	200 lb.	1.2 M	One	200	1.2 M

*Specify Units of Measure Used

(FOR AGENCY USE ONLY)

MANUFACTURING PROCESS OPERATIONS

Reference Number	Stack Data				Air Pollution Control Equipment			
	Height Feet	Inside Unit Dia. Feet	Exit Gas Velocity Feet/Sec.	Exit Gas Temperature °F	Manufacturer and Model Number	Type* (use Table 1)	Collection Efficiency Design	Collection Efficiency Actual
WP #1	20	1.00	32	Ambient	MikroPul Mod. #Unknown	35	99.9%	99.9%
WP #1a	30	2.00	40	"	MikroPul Mod. #Unknown	35	99.9%	99.9%
WP #2	20	1.00	42	"	Nax Equipment Co. 96LST64-3	35	99.9%	99.9%
WP #3	20	1.00	32	"	MikroPul Mod. #Unknown	35	99.9%	99.9%
WF #1	18'	1.00	76	"	[illegible]	10	99.9%	99.9%

Note: All reverse jet bag houses filter less than 6 SCFM/Sq. Ft. cloth area. All powder production units have secondary filter baghouses to refilter the air before release to the atmosphere. The high efficiency of the baghouses is enhanced by the redundant filtration resulting in overall filtration efficiency of greater than 99.9%.

*For Wet Scrubbers Give Gallons per minute Water Flow and Water Pressure if known.

MANUFACTURING PROCESS OPERATIONS

(FOR AGENCY USE ONLY)

11 12

Reference Number	Process Emissions*			Basis for Estimation	(Agency Comments Only)
	Particulates	Sulfur Oxides	Others (Specify by chemical composition)		
WP #1	.0005 lb/hr 3 lb/yr	0	0	Redundant Baghouse 99.9%-99.9%	
WP #1a	.0005 lb/hr 3 lb/yr	0	0	"	
WP #2	.001 lb/hr 6 lb/yr	0	0	"	
WP #3	.0005 lb/hr 3 lb/yr	0	0	"	
WP #4	.0002 lb/hr 1.2 lb/yr	0	0	—	

*Please Express Emissions as Tons per Year and Pounds per Hour and Identify Units Being Used.

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

June 8, 1993

RED PANTHER CHEMICAL CO.
P.O. BOX 550
CLARKSDALE, MS 38614

Dear Madam or Sir:

Re: Title V Permit Program

As you may be aware, the Federal Clean Air Act was amended in 1990, and, under Title V of the Act, states are required to develop and implement a Federal Air Operating Permit Program. In 1993, the Mississippi legislature passed SB 2649 which established the legal authority needed for the DEQ to develop a Title V program that EPA can approve. One of the required program elements is a fee program which covers the entire direct and indirect cost of the Title V program. SB 2649 established that this fee would be based on the emissions of regulated air pollutants from all facilities required to hold a Title V permit and would be assessed annually on the previous year's emissions.

A review of your current permit and file indicates that your source will be required to hold a Title V permit. Our evaluation of your allowable emissions is shown on the attached form. As provided by SB 2649, you may elect to use either actual or allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for calculating actual annual emissions were specified in SB 2649 and are listed on the attachments. If you choose the basis of actual emissions, you must submit your inventory of emissions for the previous calendar year (1992), by July 1, 1993, along with the methodology used in determining the inventory. If we do not receive an inventory of emissions from you by July 1, 1993, we will assume that you have elected to use the allowable emissions we have determined as the basis for this year's assessment of fees.

We have identified the pollutants which your files indicate that your source emits. It is your responsibility by law to report any and all pollutants emitted, not just those we identified. The attached list of regulated pollutants should be reviewed to make sure all

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 0540 - 00010 **Date:** _____ **SIC Code:** 2879

Facility Name: RED PANTHER CHEMICAL CO.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	5.03	
SO2	27.33	
NOX	0	
CO	0	
VOC*	15.65	
LEAD	0	
TRS	0	
Total HAPs (Voc)	15.65	
Total HAPs (Non-Voc)	6.2	
CFCs/HCFCs	0	
Other	0	

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

_____ _____
Signature and Title Date

MDEQ Number:	0540 - 00010
Name:	RED PANTHER CHEMICAL CO.
1 HAPs > 10:	12.5
2 HAPs > 10:	0
3 HAPs > 10:	0
Total HAPs:	21.85
CFCs/HCFCs:	0
Other:	0
HAP List:	METHANOL

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
James I. Palmer, Jr., Executive Director

MEMORANDUM

TO: Wayne Anderson / Dan McLeod

FROM: Brian Ketchum

SUBJECT: Source Re-Evaluation - Red Panther Chemical Company
Facility No. 0540-00010
Clarksdale, Mississippi

DATE: March 18, 1998

According to a phone conversation and letter received on March 4, 1998, all formulation operations at the facility were ceased on August 31, 1996, and currently the facility is being utilized only as a storage location for agricultural supplies. The facility currently stores bags of soy bean seeds, cotton seeds, and agricultural chemicals in 55 and 2 ½ gallon containers.

Based on this information, Red Panther has no air emissions and should be classified as a true minor source. Since the facility no longer has emissions that exceed the Title V threshold limits, it is recommended that they be taken out of the Title V Program.

FILE COPY

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

March 18, 1998

Mr David Coleman, President
Red Panther Chemical Company
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Facility No. 0540-00010
Program Re-classification
Clarksdale, Mississippi

We received a letter on March 4, 1998, concerning the above referenced facility's permitting status. According to this letter and a recent phone conversation, the facility ceased all formulation operations on August 31, 1996, and currently the facility is being utilized only as a storage location for agricultural chemicals. Based on this information, we agree that the facility's potential to emit is less than the Title V threshold limits, and therefore, the facility has been taken out of the Title V Program.

Please be aware that if the facility plans operations in the future that would cause the release of air emissions, a construction application and the resulting issuance of a Permit to Construct would be required in accordance with Mississippi Air Regulations, APC-S-2, Section I.B.1.

If you have any questions, please contact me at (601) 961-5393.

Sincerely,

Brian Ketchum, P.E.
Air Facilities Branch

BSK

OFFICE OF POLLUTION CONTROL
P.O. Box 10385 Jackson, MS 39289.0385 Phone 601.961.5171 Fax 601.354.6612

FILE COPY

RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

MARCH 04,1998

MR.BRIAN KETCHUM,P.E.
OFFICE OF POLLUTION CONTROL
AIR FACILITIES BRANCH
P.O.BOX 10385
JACKSON,MS 39289

0540-00010

DEAR MR. KETCHUM:

RE: CONVERSATION ON THE MORNING OF MARCH 04,1998.

RED PANTHER CHEMICAL COMPANY CEASED ITS FORMULATION OPERATIONS ON AUGUST 31,1996. THIS LETTER IS CONCERNING THE NOTICE RED PANTHER RECEIVED CONCERNING THE TITLE V OPERATING PERMIT. DURING OUR CONVERSATION YOU REQUESTED A LETTER STATING OUR PRESENT OPERATING STATUS. WE ARE STRICTLY IN THE WAREHOUSING BUSINESS AT THIS TIME. IF YOU NEED ANY FURTHER INFORMATION PLEASE DO NOT HESITATE TO CALL. THANKS FOR YOUR HELP. OUR PHONE NUMBER IS 601-6270-4731.

REGARDS,

David Coleman

DAVID COLEMAN
PRESIDENT

RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

January 6, 1996

Mr. Wayne Anderson, Chief
Air Facilities Branch
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

Subject: Deferment of Title V Permit Application

Dear Mr. Anderson:

As requested by Mr. Mark Wyatt of your staff, this letter is written to provide you with additional information related to our request to defer submittal of the Title V permit application until January 27, 1997. As explained in Leech and Associate's letter to you on January 24, 1996, we believe that emissions from this facility are significantly less than the Title V thresholds established for criteria and hazardous air pollutants (HAPs). Based on our consultant's preliminary assessment, criteria pollutants are less than 10 tons per year, and total HAPs are less than 5 tons per year. This is supported by our production over the last three years. Production rates have not varied by over 10% from 1993 to 1995. HAPs in 1993 were reported by 24.36 pounds. Although this emission rate was based on inventory balances, we do not expect the level to approach the Title V threshold levels when calculated using emission factors. In addition, we will no longer be producting two major products in 1997. This will also have the effect of reducing overall emissions.

We do not have large operations that produce excessive emissions. Emissions are primarily associated with small process and storage tanks, inline valves and components, and a small fired boiler and process heaters. In addition, raw materials are incorporated into the products produced, and are not indiscriminately released into the environment.

We are gathering additional information needed to make more definitive emissions computations. We would appreciate your consideration in allowing us until May 1, 1996 to complete these computations and submit the information to you.

I hope that this information is sufficient for you to grant our request. Please contact me at (601) 627-4731 ext 3028 if you have any further questions.

Sincerely,

Ross Davis
President

cc: T. J. Leech, Leech & Associates

RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

January 6, 1996

Mr. Wayne Anderson, Chief
Air Facilities Branch
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

Subject: Deferment of Title V Permit Application

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Sincerely,

Ross Davis
President

cc: T. J. Leech, Leech & Associates

Leech and Associates
Environmental Specialists

0540-00010

January 24, 1996

Mr. Wayne Anderson, Chief
Air Facilities Branch
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, TN 39289-0385

Subject: Red Panther Chemical Company, Clarksdale, MS

Dear Mr. Anderson:

I am writing to you on behalf of my client, Red Panther Chemical Company, located in Clarksdale, Mississippi. The purpose of this letter is to request deferment of the Title V permit application for Red Panther Chemical Company until January 27, 1997. This company is a contract formulator of pesticides. Emissions are primarily associated with process and storage tanks, and in-line valves and components. There is also a gas fired boiler and six small process heaters.

I am in the process of calculating the total criteria pollutant emissions and hazardous air pollutants (HAPs) that was emitted from this facility in 1994. Although I have not completed the computations, I am confident that all criteria pollutants are significantly less than 10 tons per year, and that individual and total HAPs are less than 5 tons per year. The emission rates from this facility will never exceed these levels, without making significant process changes. Any such change would be submitted to your Department for approval.

I hope that this request is sufficient for now to obtain a deferment for this source. I will be happy to submit my calculations to you when I am completed.

Please contact me at (901) 344-5340 if you have any questions concerning this request.

Sincerely

Thomas J. Leech III

Thomas J. Leech, III
Environmental Representative

cc Robert Gaston, Red Panther Chemical Company

3720 Plum Point Drive East
Olive Branch, Mississippi 38654-8000
Telephone (601) 895-4415 or (901) 344-5340, Facsimile: (901) 344-5387

RED PANTHER CHEMICAL COMPANY

VENDOR: DEPT. OF ENVIRONMENTAL QUALITY 1211

OUR REF. NO.	YOUR INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	CHECK AMOUNT
009690	STMT	11/17/95	216.84		.00	216.84

0540-0001 0

TOTALS ->001211	112795	216.84		.00	216.84

RED PANTHER CHEMICAL COMPANY
P. O. BOX 550
CLARKSDALE, MISSISSIPPI 38614
(601) 627-4731

First National Bank of Clarksdale
PO Box 220 Clarksdale, MS 38614

85-102
842

001211

CHECK NO.	CHECK DATE	VENDOR NO.
1211	11/27/95	000405

CHECK AMOUNT

*******216.84 *******216.84

PAY TO THE ORDER OF
DEPT. OF ENVIRONMENTAL QUALITY
DEPT. OF ENVIRONMENTAL QUALITY
P.O. BOX 20325
JACKSON MS 39289-1325

BY Charles E. Brown

BY Diane P. Campbell
AUTHORIZED SIGNATURE

⑈001211⑈ ⑆084201029⑆ 016⑈8963⑈

DEC 1995
RECEIVED
AS/BS
FEES

DEPT OF ENVIRONMENTAL QUALITY
TITLE V AIR PERMIT FEE
P. O. Box 20325
Jackson, MS 39289-1325

** INVOICE **

*** TITLE V AIR OPERATING PERMIT FEE ***

BILL TO:
RED PANTHER CHEMICAL CO

P O BOX 550
CLARKSDALE, MS 38614

INVOICE # 172
INVOICE DATE: 8/01/95

CONTACT PERSON: Cheryl Shelby
TELEPHONE: 601-961-5381

FACILITY I.D. # 0540-00010

TERMS: DUE 9/1/95

POLLUTANT	ACTUAL OR ALLOWABLE EMISSIONS	TONS OF EMISSIONS BILLED	FEE PER TON OF EMISSIONS	TOTAL FEE
PARTICULATE MATTER	5.030	5.030	16.00	80.48
SO2	27.330	27.330	16.00	437.28
NOX	0.000	0.000	16.00	0.00
CO	0.000	0.000	16.00	0.00
VOC	15.650	15.650	16.00	250.40
LEAD	0.000	0.000	16.00	0.00
TRS	0.000	0.000	16.00	0.00
TOTAL HAP's (VOC)	15.650	0.000	16.00	0.00
TOTAL HAPs (Non-Voc)	6.200	6.200	16.00	99.20
CFC's / HCFC's	0.000	0.000	16.00	0.00

TOTAL ANNUAL FEE DUE 867.36

As per Section 49-17-30 of the MS Code, the maximum emission rate used for calculation of fees for any pollutant is 4,000 tons, with total fees not to exceed $250,000 per facility. You were billed for actual or allowable emissions based upon the option which you previously indicated.

* * * FAILURE TO REMIT PAYMENT BY THE DUE DATE MAY * * *
* * * * * * * * RESULT IN A LATE PENALTY * * * * * * * *

FILE COPY

842

RED PANTHER CHEMICAL COMPANY
P. O. BOX 550
CLARKSDALE, MISSISSIPPI 38614

August 24, 1995.

№ 17660

To
UNITED SOUTHERN BANK
CLARKSDALE, MISSISSIPPI 38614

PAY $216.84

TO THE ORDER OF —

Dept. of Environmental Quality
Title V Air Permit Fee
P.O. Box 20325
JACKSON, MS. 39289-1325

RED PANTHER CHEMICAL COMPANY

By Charles E. Brown

By Diane P. Campbell

⑈017660⑈ ⑆084201210⑆ 010 0025259⑈

Invoice No. 72
Quarter 9/1/95 Due - 1st Payment

ACCOUNT DISTRIBUTION

T/C 1	GENERAL LEDGER ACCT. NO. 9	UNITS 46	DEBIT $ 56	CREDIT $ 56	SUB. NO. 68
	2405-00		216.84		

RED PANTHER CHEMICAL COMPANY

№ 17660

DETACH BEFORE DEPOSITING

0540-00610

AUG 1995
RECEIVED
AS/BS
FEES

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

February 7, 1995

Mr. David Coleman
Red Panther Chemical Co.
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Facility No. 0540-00010

On October 20, 1993, the Environmental Protection Agency (EPA) proposed a regulation governing accidental release prevention. This rule proposes requirements for a risk management program for facilities that have more than a threshold quantity of a regulated substance. Also, the list of the regulated substances and the threshold quantities was promulgated January 31, 1994.

We have attached a copy of the proposed regulation, the promulgated regulated substance list and a "fact sheet" which clarifies some of the provisions. We are sending this information to assist you in completing Section C of your Title V Permit Application. We understand that EPA will not be promulgating the final risk management program regulation until some time in 1996.

If you have any questions, please contact Joseph Curro at (601) 961-5655, Kirk Shelton at (601) 961-5333, or me at (601) 961-5390.

Sincerely,

Melanie Magee

Melanie Magee
Air Toxics Branch

MM
Enclosures

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 25, 1995

Mr. David Coleman
Red Panther Chemical Co.
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Facility No. 0540-00010

As you know, Mississippi's Title V operating permit program becomes effective on January 27, 1995. At that time, the provisions of Section 112(g) of the Clear Air Act as amended in 1990 also become effective. Under Section 112(g), a major source of hazardous air pollutants proposing new construction, reconstruction, or modifications must perform a Case-by-Case Maximum Achievable Control Technology (MACT) determination when no federal promulgated MACT standard exists. The MACT determination must reflect the maximum degree of reduction of HAP emissions taking into consideration the costs of achieving such emission reductions, and any non-air quality health and environmental impacts, and energy requirements.

The MACT determination must be submitted to our office prior to construction in order to establish federally enforceable emission limitations. Once reviewed, the permitting authority will issue a Notice of MACT Approval containing the MACT emission limitation and any other requirements.

The proposed regulations (40 CFR Part 63, Subpart B) for implementing Section 112(g) were published in the Federal Register on April 1, 1994. This regulation and the proposed Guidelines for MACT Determinations under Section 112(g) [EPA 450/3-92/007(b)] are available in the EPA library or by contacting this agency. At this time, we are expecting further EPA guidance on the modification provision of the proposed regulations.

Enclosed is a promulgation schedule for source category MACT standards. If you have any questions, please call me at 601-961-5538 or Richard Sumrall at 601-961-5791.

Sincerely,

D. Anthony Robinson
Air Toxics Branch

MACT.FIN.212

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE CO

MEMO

TO: Cheryl Shelby
FROM: Buster McMillan
DATE: January 13, 1995
RE: Red Panther (Facility No. 0540-00010)

It was brought to our attention that the actual emissions reported by Red Panther was 24.36 "lbs/yr" (not TPY) for VOC's. The correct amount, after the conversion, should be 0.01 TPY VOC's.

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE CO

MEMO

TO: Cheryl Shelby
FROM: Buster McMillan
DATE: January 13, 1995
RE: Red Panther (Facility No. 0540-00010)

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STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

January 12, 1995

Certified Mail No. Z 200 270 540

Mr. David Coleman
Red Panther Chemical Co.
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Facility No. 0540-00010

As you know from previous correspondence, the referenced facility is one that we have identified as subject to Title V, and, as such, requires a Title V Operating Permit.

On Wednesday, December 28, 1994, EPA promulgated in the Federal Register full approval of our Title V Operating Permit Program. The effective date of this promulgation is January 27, 1995. In accordance with State and Federal requirements the deadline for submission of the facility's application for a Title V Operating Permit is **January 27, 1996.** Enclosed is an application form. This form must be used for the Title V application.

Also enclosed is an addendum to the Title V application forms necessary for making application for a synthetic minor Operating Permit. Please note that the facility must have either been issued a synthetic minor Operating Permit or have submitted a Title V application by January 1?, 1996. If you plan on obtaining a synthetic minor Operating Permit, we suggest that you submit that application by April 1, 1995, to facilitate obtaining that permit prior to the deadline for filing your Title V application.

If you have any questions, feel free to contact us.

Very truly yours,

Don Watts, Chief
Air Permitting Branch

DW:sr
Enclosure

T5APPSUB.FIN.284

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

September 27, 1994

Mr. David Coleman
Red Panther Chemical Co.
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Facility No. 0540-00010
Synthetic Minor Operating Permit Program

As of our latest review, your current file indicates that your facility will be required to hold a Title V Operating Permit. This letter is to address the requirements and conditions of the Synthetic Minor Operating Permit Program for potential Title V facilities. After revisions to the State Implementation Plan (SIP) are approved by the United States Environmental Protection Agency (EPA), the Mississippi Department of Environmental Quality (DEQ) will have the authority to issue Synthetic Minor Operating Permits.

In order to receive a Synthetic Minor Operating Permit, your facility must first be classified as a Synthetic Minor Source. A Synthetic Minor Source is any facility which would otherwise constitute a major source under Commission Regulation APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act", except that the owner or operator of the facility elects for federally enforceable emissions limitations which may include permit conditions restricting hours of operation; type or amount of material stored, combusted, or processed; or establishing more stringent air pollution control efficiency requirements to lower allowable emissions for air pollutants in the State Permit to Operate below applicability thresholds for a Title V major source. As you may be aware, the current thresholds defining a facility as a Title V major source are 10 tons per year (tpy) or more of any hazardous air pollutant, 25 tpy or more of any combination of hazardous air pollutants, or 100 tpy or more of any air pollutant.

We are trying to determine how many Title V sources are planning to pursue a Synthetic Minor Operating Permit. Therefore, we would like for you to complete and return the enclosed form by October 10, 1994. Your indication is not a commitment; you will still have the opportunity to pursue either a Title V Permit or a Synthetic Minor Permit. This information will simply be used as a tool in planning the most efficient use of our resources.

If you have any questions, please call me at (601)961-5171.

Sincerely,

Brian Ketchum
Title V Permitting Section

Enclosure

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

May 13, 1994

Mr. David Coleman
Red Panther Chemical Co.
P.O. Box 550
Clarksdale, MS 38614

Dear Mr. Coleman:

Re: Title V Air Operating Permit Program

As you are aware, Title V of the Federal Clean Air Act requires all states to develop and implement a Federal Air Operating Permit Program. Sections 49-17-1 through 49-17-43 of the Mississippi Code Annotated establish the legal authority for the DEQ to develop a Title V program. One of the required program elements is a fee program which covers the entire direct and indirect cost of the Title V program. Section 49-17-30 established that this fee would be based on the emissions of regulated air pollutants from all facilities required to hold a Title V permit and would be assessed annually.

A review of your current file indicates that your source will be required to hold a Title V permit. The evaluation of your allowable emissions is shown on the attached reporting form. As provided by Section 49-17-32, you may elect to use either actual or allowable (potential) emissions in determining the annual quantity of emissions to be used in assessing fees. Acceptable methods for calculating actual annual emissions were specified in Section 49-17-32 and are listed on the attachments. If you choose the basis of actual emissions, you must submit the attached reporting form showing your inventory of emissions for the 1993 calendar year by July 1, 1994, along with the calculations and the methodology used in determining the inventory. If an inventory of emissions has not been received by July 1, 1994, the allowable emissions shown on the attached reporting form will be used as the basis for this year's assessment of fees.

Section 49-17-30 established that the interim fee prior to full implementation of the Title V program is $4/ton of emissions of each pollutant for which fees can be assessed under the Title V program. For purposes of fee assessment and collection, the maximum emission rate of each pollutant used in the calculation of fees shall be 4,000 tons per year per facility. Fees will be assessed on all regulated pollutants except carbon monoxide (CO) and CFCs/HCFCs.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

P.O. BOX 10385

JACKSON, MS 39289-0385

In accordance with Section 49-17-32, Mississippi Code of 1972, as amended, all sources which choose to base their Annual fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

Calendar Year Reported: _____ **MDEQ Facility ID #:** 0540 - 00010 **Date:** _____ **SIC Code:** 2879

Facility Name: RED PANTHER CHEMICAL CO.

Mailing Address: _____ _____ _____ _____
(Street or P.O. Box) (City) (State) (Zip)

Site Address: _____ _____ _____
(Street Location) (City) (County)

Contact and Title: _____ **Contact's Phone #:** _____

(1) Pollutant	(2) Annual Allowable (Potential) Emission Rate (TPY)	(3) Actual Annual Emission Rate (TPY)
Particulate Matter (PM)	5.03	
SO2	27.33	
NOX	0	
CO	0	
VOC*	15.65	
LEAD	0	
TRS	0	
Total HAPs (Voc)	15.65	
Total HAPs (Non-Voc)	8.2	
CFCs/HCFCs →	0	
Other	0	

* Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

_____ _____
Signature and Title Date

MDEQ Number:	0540 - 00010
Name:	RED PANTHER CHEMICAL CO.
1 HAPs > 10:	12.5
2 HAPs > 10:	0
3 HAPs > 10:	0
Total HAPs:	21.85
CFCs/HCFCs:	0
Other:	0
HAP List:	METHANOL

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

February 17, 1994

Dear Sir:

Under the Clean Air Act as amended in 1990, the Environmental Protection Agency (EPA) is required to publish National Emission Standards for Hazardous Air Pollutants (NESHAP) according to selected source categories. The EPA has recently proposed a NESHAP which, when finalized, will require that no chromium or chromium compounds be used in any Industrial Process Cooling Tower (IPCT) for water treatment programs or any other reason. This standard will apply for any cooling tower that is a major source or an integral part of a facility that is a major source.

The Mississippi Department of Environmental Quality is attempting to identify facilities in Mississippi that may be impacted. We are asking for your help in this determination by completing and returning the enclosed survey. Also enclosed is a sheet which gives the definition of a major source as stated in the CAA and a brief description of what an industrial process cooling tower is and how it is used.

We believe you will be able to complete this survey in just a few minutes. Please return this survey by March 25, 1993. If you have any question, please call me at (601) 961-5672.

Sincerely,

Scott Hodges

Scott Hodges
Air Toxics Branch

Enclosure

Definition of a major source as defined in Section 112 (a)(1) of the Clean Air Act:

Major Source - The term "major source" means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants listed in Title III of the Clean Air Act(see attachment), or any such lesser quantity as the EPA may establish by rule.

Definition of a Cooling Tower and Industrial Process Cooling Tower as defined in 40 CFR Part 63, Subpart Q:

Cooling Tower - "Cooling tower" means an open water recirculating device that uses fans or natural draft to draw or force ambient air through the device to cool warm water by direct contact.

Industrial Process Cooling Tower - "Industrial Process Cooling Tower" or IPCT means any cooling tower that is used to remove heat that is produced as an input or output of a chemical or industrial process(es), as well as any cooling tower that cools industrial processes in combination with heating, ventilation or air conditioning systems.

Hazardous Air Pollutants Subject to the Provisions of Section 112 of the 1990 Clean Air Act Amendments

Chemical Name	CAS No.
Acetaldehyde	75070
Acetamide	60355
Acetonitrile	75058
Acetophenone	98862
Acetylaminofluorene(2)	53963
Acrolein	107028
Acrylamide	79061
Acrylic acid	79107
Acrylonitrile	107131
Allyl chloride	107051
Aminobiphenyl(4)	92671
Aniline	62533
Anisidine(o)	90040
Antimony Compounds	—
Arsenic Compounds (inorganic including arsine)	—
Asbestos	1332214
Benzene	71432
Benzidine	92875
Benzotrichloride	98077
Benzyl chloride	100447
Beryllium Compounds	—
Biphenyl	192524
Bis(2-ethylhexyl)phthalate (DEHP)	117817
Bis(chloromethyl)ether	542881
Bromoform	75252
Butadiene(1,3)	106990
Cadmium Compounds	—
Calcium cyanamide	156627
Caprolactam	105602
Captan	133062
Carbaryl	63252
Carbon disulfide	75150
Carbon tetrachloride	56235
Carbonyl sulfide	463581
Catechol	120809
Chloramben	133904
Chlordane	57749
Chlorine	7782505
Chloroacetic acid	79118
Chloroacetophenone(2)	532274
Chlorobenzene	108907
Chlorobenzilate	510156
Chloroform	67663
Chloromethyl methyl ether	107302
Chloroprene (Neoprene; 2-Chloro-1,3-butadiene)	126998
Chromium Compounds	—
Cobalt Compounds	—
Coke Oven Emissions	—
Cresol(m)	108394
Cresol(o)	95487
Cresol(p)	106445
Cresols/Cresylic acid	1319773
Cumene (Isopropylbenzene)	98828
Cyanide Compounds[1]	—
D(2,4), salts and esters	94757
DDE	3547044
Diazomethane	334883
Dibenzofurans	132649
Dibromo-3-chloropropane(1,2)	96128
Dibutylphthalate	84742
Dichlorobenzene(1,4)(p)	106467
Dichlorobenzidene(3,3)	91941
Dichloroethyl ether (Bis(2-chloroethyl)ether)	111444
Dichloropropene(1,3)	542756
Dichlorvos	62737
Diethanolamine	111422
Diethyl aniline (N,N) (Dimethylaniline (N,N))	121697
Diethyl sulfate	64675
Dimethoxybenzidine(3,3')	119904
Dimethyl aminoazobenzene	60117
Dimethyl benzidine(3,3')	119937
Dimethyl carbamoyl chloride	79447
Dimethyl formamide	68122
Dimethyl hydrazine(1,1)	57147
Dimethyl phthalate	131113
Dimethyl sulfate	77781
Dinitro-o-cresol(4,6), and salts	534521
Dinitrophenol(2,4)	51285
Dinitrotoluene(2,4)	121142
Dioxane(1,4) (1,4-Diethyleneoxide)	123911
Diphenylhydrazine(1,2)	122667
Epichlorohydrin (Chloro-2,3-epoxypropane(1))	106898
Epoxybutane(1,2) (1,2-Butylene oxide)	106887
Ethyl acrylate	140885
Ethyl benzene	100414
Ethyl carbamate (Urethane)	51796
Ethyl chloride (Chloroethane)	75003
Ethylene dibromide (1,2-Dibromoethane)	106934
Ethylene dichloride (1,2-Dichloroethane)	107062
Ethylene glycol	107211
Ethylene imine (Aziridine)	151564
Ethylene oxide	75218
Ethylene thiourea	96457
Ethylidene dichloride (1,1-Dichloroethane)	75343
Formaldehyde	50000
Glycol ethers[2]	—

[1] X'CN where X = H' or any other group where a formal dissociation may occur, for example, KCN or $Ca(CN)_2$.

[2] Includes mono- and di- ethers of ethylene glycol, diethylene glycol and triethylene glycol $R-(OCH_2CH_2)_n-OR'$ where:
n = 1, 2, or 3

FILE COPY

October 31, 1991

Mr. Bobby Cain
Quality Control Manager
Red Panther Chemical Company
P.O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Cain:

Re: Operating Permit No. 0540-00010
Clarksdale, Mississippi
Coahoma County

We have received your application for renewal of the referenced Operating Permit. In accordance with Regulation APC-S-2, Section IX.B., your existing Operating Permit "shall remain in effect until final action on the application is taken by the Permit Board", even if the permit expires prior to the final action.

If you have any questions, please contact us.

Very truly yours,

Tim Parrish
Stationary Source Compliance Section

TP:jc

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

October 21, 1993

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Red Panther Chemical Co.
PO Box 550
Clarksdale, MS 38614

Dear Sir:

The Federal Clean Air Act as amended in 1990 required the Environmental Protection Agency (EPA) to publish a list of all categories and subcategories of major and area sources of hazardous air pollutants. In addition, the EPA is required to establish air emission standards for each category and subcategory. The Hazardous Organic National Emission Standard for Hazardous Air Pollutants (HON) is one of the first emission standards proposed by EPA. When finalized, this regulation will reduce organic hazardous air pollutant emissions from chemical processes in the Synthetic Organic Chemical Manufacturing Industry and seven other processes. These other processes are: Styrene-Butadiene Rubber production; Polybutadiene production; Chlorine production; Pesticide production; Pharmaceutical Production; Chlorinated Hydrocarbon use; and Miscellaneous Butadiene use.

We are attempting to identify facilities in Mississippi that will be impacted by this new regulation. We are therefore asking for your help in securing information on your chemical manufacturing processes. Enclosed is a survey that outlines the needed information. Please complete and return this survey by November 30, 1993.

If you have any questions, please call me at (601) 961-5791.

Sincerely,

Richard Sumrall
Air Toxics Branch

RS/ss
Enclosure

10-19-93.2/ss