

Check Sheet

Company Name: JACKSONVILLE SHIPYARDS, INC  
Permit Number: AC 16-58084  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

**Cross References:**

- AO 16-40678
- 
- 

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit
- Correspondence with:
  - EPA
  - Park Services
  - Other
- Proof of Publication
  - Petitions - (Related to extensions, hearings, etc.)
  - Waiver of Department Action
  - Other

**Final Determination:**

- Final Determination *ok*
  - Signed Permit *ok*
  - BACT Determination
  - Other
- issued 5/17/83 -*

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

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 one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

**Folder Name:** Jacksonville Shipyards, Inc

**Permit(s) Numbered:**

AC	16	-	58684
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Period during  
which document  
was received:

Detailed Description

APPLICATION	1.	PHOTOS OF SITE
-------------	----	----------------

file: permit file

DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES  
Bio-Environmental Services Division  
Air and Water Pollution Control

June 26, 1984



DER

JUN 29 1984

BAQM

Mr. Richard G. Seitz  
Jacksonville Shipyards, Inc.  
P.O. Box 2347  
Jacksonville, Florida 32203

Re: Grit Storage Facility

Dear Mr. Seitz:

Prior to issuance of Operation Permit A016-81822 for the captioned sources, please submit an Operation and Maintenance Plan in accordance with Rule 17-2.650(2)(g)FAC. Your response on or before July 15, 1984 is requested.

If you have any questions concerning this matter, please advise.

Very truly yours,

Jerry E. Woosley  
Assistant Engineer

JEW/vj  
Enclosure

cc: Mr. Madison Smith, without enclosure  
cc: Mr. Doug Dutton - DER, without enclosure  
~~cc:~~ Mr. Clair Fancy, P.E., without enclosure



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

May 3, 1984

Mr. J. Madison Smith  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Smith:

Modification of Conditions  
Permit No. AC 16-58684

We are in receipt of your request for a modification of the conditions in the construction permit for your Grit Handling Facility. The conditions are changed as follows:

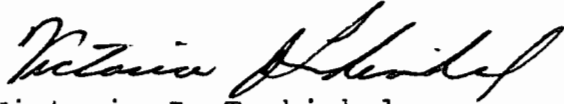
<u>Modified Condition</u>	<u>From</u>	<u>To</u>
Expiration Date	April 30, 1984	August 31, 1984

New Specific Condition

7. Submit complete test reports for filter systems No. 1 and 2 to Bio-Environmental Service on or before June 1, 1984.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

  
Victoria J. Tschinkel  
Secretary

VJT/s

cc: Bio-Environmental Service

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel  
FROM: Clair Fancy *Clair Fancy*  
DATE: May 2, 1984  
SUBJ: Extension of Jacksonville, Shipyards, Inc.  
Air Construction Permit Number  
AC 16-58684

RECEIVED

MAY 3 1984

Office of the Secretary

The Bureau has received another request from Jacksonville Shipyards, Incorporated for an extension of the expiration dates for their grit handling system. This action is needed because these units have not been completed and put into operation.

Therefore, we respectfully request that the extensions, with conditions, be granted.

CHF/WH/s

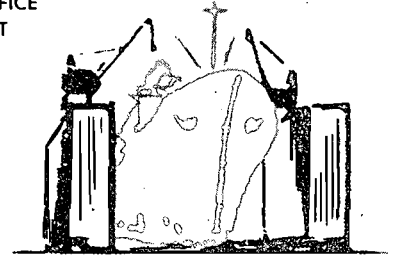


# JACKSONVILLE SHIPYARDS, INC.

SUBSIDIARY OF FRUEHAUF CORPORATION

NEW YORK OFFICE  
21 WEST STREET  
212-943-2397

CABLE ADDRESS-JAXSHIPPING  
TELEX 5-6284



(904)355-1711

P. O. BOX 2347

JACKSONVILLE, FLORIDA 32203

April 27, 1984

Mr. Clair Fancy  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Re: Permit No. AC 16-58684

Dear Fancy,

As per our telephone conversation Thursday, April 26, 1984, this is a follow up letter indicating the posture of our Grit Handling Facility.

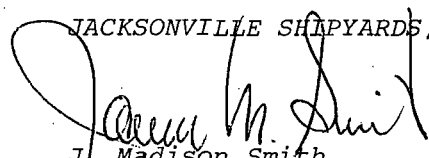
Our Modification of Conditions Permit expires April 30, 1984, and as I stated by phone, we feel we will miss our target date by some fifteen days. We had some equipment and building delays that made our schedule impossible; (a) the scrubbers were delivered six weeks late; (b) building was to be erected in three days by sub-contractor, which turned out to be twenty-five days.

At this time Jacksonville Shipyards feel that we can complete modification and test all systems and have a report to the local agency (Bio-Environmental Services) on or by June 1, 1984.

As photos and completion schedule (attached) indicates, this project is near completion at this time. However, we feel an extension of time is necessary. Thus, Jacksonville Shipyards, Inc., respectfully request our Permit AC 16-58684 be extended from April 30, 1984, to June 1, 1984.

If I may be of any other assistance in this matter, please advise.

Very truly yours,

JACKSONVILLE SHIPYARDS, INC.  
  
J. Madison Smith  
Ass't. Manager Medical/Safety  
& Environmental Affairs

Attachments

cc: Jerry Woosley

GRIT STORAGE HANDLING SYSTEM AND DUST COLLECTION

ACCOMPLISHMENTS:

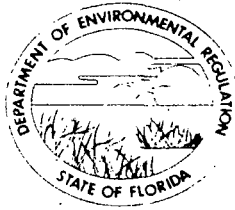
- |   |                      |
|---|----------------------|
| 1. Pit                                      | Complete             |
| 2. Slab                                     | Complete             |
| 3. Building                                 | Complete             |
| 4. Bucket Elevator                          | 99% one piece missed |
| 5. Belt Conveyor                            | Complete             |
| 6. Scrubber Installation<br>and Duct System | 75%                  |
| 7. Electrical                               | 70%                  |

THINGS TO BE ACCOMPLISHED:

1. Electrical System to complete
2. Finish Duct System to Scrubbers
3. Bucket Elevator - Test run and adjust
4. Belt Conveyor - Test run and adjust
5. Operational test of Complete System
6. Rail Tracks to be relayed
7. Clean-up area
8. Paving

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

October 24, 1983

Mr. J. Madison Smith  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Smith:


Modification of Conditions  
Permit No. AC 16-58684

We are in receipt of your request for a modification of a permit condition. The condition is changed as follows:

<u>Condition</u>	<u>From</u>	<u>TO</u>
Expiration Date	September 30, 1983	April 30, 1984

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

  
Victoria J. Tschinkel  
Secretary

VJT/s

cc: Dan Farley, Dan Farley and Associates  
Steve Pace, Jacksonville Bio-Environmental Services  
Doug Dutton, FDER, Northeast District



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
**INTEROFFICE MEMORANDUM**

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel  
FROM: Clair Fancy *Clair Fancy*  
DATE: October <sup>25</sup>~~21~~, 1983  
SUBJ: Modification of Permit Conditions

**RECEIVED**  
OCT 25 1983  
Office of the Secretary

Jacksonville Shipyards Incorporated, has requested that the expiration date for construction permit No. AC 16-58684 (two scrubbers for a grit storage silo and conveyor) be extended seven months to April 30, 1984. Rule 17-2.650(2)4.b., FAC, (RACT) allows up to March 15, 1985 for this source to be brought into compliance. Neither Jacksonville Bio-Environmental Services or the Bureau of Air Quality Management object to the requested extension. We recommend that the attached permit modification letter be approved by you.

CHF/ks

# DAN FARLEY & ASSOCIATES

September 29, 1983

Mr. Clair Fancy  
Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32304

DER

SEP 30 1983

BAQM

Dear Mr. Fancy:

RE: JSI PERMIT NO. AC16-58684  
ISSUED 5-17-83  
EXPIRES 9-30-83

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The reason for this letter is it seems that I have failed to recognize that due to the extended processing time and modifications of this permit application, we ended up with an impossible expiration date. This permit for the modifications to JSI's Grit Storage Silo was required by BES as a condition in JSI's Grit Blasting Permit issued May 14, 1981.

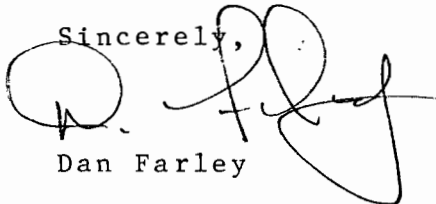
It seems to me that the extended length of time that was required to process this permit for modification of the existing storage silo was due primarily to the desire by the BES to impose an annual limitation on JSI with regard to total grit usage and now it seems that some earlier expected completion date for facilities modification is no longer feasible.

Also, JSI received their new floating dry dock this summer and the engineering personnel have been tied up with replacement of the old dry dock.

I would like to point out that the grit blasting permit also called for JSI to construct a bridge over Hogans Creek such that all grit transfer would be conducted entirely within the confines of JSI; all the parking, grit transfer and transport locations have been paved. JSI has also constructed a large blasting booth to handle smaller component parts and they have instituted the sweeping programs outlined in the permit. Those modifications to the storage silo are all that remains to complete the conditions attached to the May 81 permit.

The bottom line is JSI is currently purchasing the necessary components to undertake these modifications. JSI expects all necessary components to be delivered within 90 days and that all construction and testing of this modified silo and transfer facility be completed by April 30, 1984.

Therefore, please consider this an official request to extend the expiration date of this permit to April 30, 1984. If you should have any questions with this request, please do not hesitate to contact me.

Sincerely,  
  
Dan Farley

cc: Richard Seitz  
Madison Smith  
Bob Sholtes  
Doug Chunn  
Steve Pace

10/18  
Bill T. NO, says  
John  
This got temporarily buried  
Have Willard (~~Patricia~~ ~~WAA~~  
~~expert~~ ~~test~~ ~~of~~ ~~time~~) club rule  
to make sure 4/30/84 does not  
violate the rule. If so, give them  
the extension but emphatically  
state that there will be no more  
extensions. This is for a compliance  
schedule that has dragged for  
some time.  
Clair

No. **0157011**  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

SENT TO		J. Madison Smith	
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		5/19/83	

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

**SENDER:** Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
 Show to whom and date delivered.....¢  
 Show to whom, date and address of delivery.....¢  
 RESTRICTED DELIVERY  
 Show to whom and date delivered.....¢  
 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery \$ \_\_\_\_  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Mr. J. Madison Smith  
 P. O. Box 2347  
 Jacksonville, FL 32203

3. ARTICLE DESCRIPTION:  

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157011	

 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY  
**MAY 20 1983**

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

May 18, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. J. Madison Smith  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Smith:

Enclosed is Permit Number AC 16-58684, dated May 17, 1983 to Jacksonville Shipyards, Inc. issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

*Laurel Allgeier*  
for C. H. Fancy, P.E.  
Deputy Bureau Chief  
Bureau of Air Quality  
Management

CHF/bjm

Enclosure

cc: Dan Farley, Dan Farley & Associates  
Robert Sholtes, Environmental Consultants  
John Ketteringham, DER Northeast District office  
Jerry Woosley, Jacksonville Bio-Environmental Services

FINAL DETERMINATION

Jacksonville Shipyard, Inc.  
Duval County, Florida

Application Number: AC 16-58684

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

May 12, 1983

Jacksonville Shipyard, Inc. request for the construction of air pollution abatement equipment on their grit storage facility has been reviewed by the Bureau of Air Quality Management. Notice of the department's Intent to Issue was published in the Florida Times-Union on April 7, 1983.

The preliminary determination and technical review was available for public inspection at the City of Jacksonville Bio-Environmental Services Division Office, the DER Northeast District Office and the Bureau of Air Quality Management's Office.

One comment was received during the public notice period. Mr. Dan Farley, consultant for Jacksonville Shipyard noted a mistake indicating the grit storage facility as a new source on page one of the permit application. This section has been reworded to clear up this matter.

Since no substantial comments were received, it is requested that the permit be issued with the above mentioned change.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

PERMITTEE:  
Jacksonville Shipyard, Inc.  
P. O. 2347  
Jacksonville, FL 32203

Permit Number: AC 16-58684  
Expiration Date: September 30, 1983  
County: Duval  
Latitude/Longitude: 30° 19' 20"N/  
81° 38' 30.1"W  
Project: Grit Storage Facility

This permit is issued under the provisions of Chapter(s) 403  
17-2 and 17-4, Florida Statutes, and Florida Administrative Code Rule(s)  
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 air pollution abatement equipment venting  
the railcar/truck grit receiving building and transfer system and  
a 700 ton grit storage silo to be located at the Jacksonville  
Shipyard on Shop Road, Jacksonville. The UTM's of the proposed  
facility are Zone 17, 437.990 km East and 3354.411 km North.

Construction shall be in accordance with the attached permit  
application, plans, documents, and drawings except as otherwise  
noted on pages 3 and 4 - "Specific Conditions".

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form  
17-1.122(16).
2. Response to incompleteness letter received January 4, 1983.
3. Request for changes to preliminary determination received  
March 18, 1983.



PERMITTEE:  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, Fl 32203

I. D. Number:  
Permit Number: AC 16-58684  
Expiration Date: Sept. 30, 1983

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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:**  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, Fl 32203

**I. D. Number:**  
Permit Number: AC 16-58684  
Expiration Date: Sept. 30, 1983

**GENERAL CONDITIONS:**

6. The permittee shall at all times 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, 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 the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- 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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; 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.

PERMITTEE:  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, FL 32203

I. D. Number:  
Permit Number: AC 16-58684  
Date of Issue:  
Expiration Date: Sept. 30, 1983

**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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, FL 32203

**I. D. Number:**  
**Permit Number:** AC 16-58684  
**Expiration Date:** Sept. 30, 1983

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 measurements;
  - the person responsible for performing the sampling or measurements;
  - 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.

15. 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 submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

- 1. Maximum particulate matter emission shall be:

Source	Emission Limitation	Maximum Emission Rate (lb/hr)
Filter system #1	0.03 gr/dscf	1.93
Filter system #2	0.03 gr/dscf	1.93

- 2. Visible emissions shall not exceed five percent opacity.

PERMITTEE:  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, FL 32203

I.D. Number:  
Permit Number: AC 16-58684  
Expiration Date: Sept. 30, 1983

**SPECIFIC CONDITIONS:**

3. Maximum silo loading rate shall be 40 tons per hour of grit.
4. Compliance with the emission limitations shall be determined by mass particulate matter sampling using DER method 5 for the transfer facilities. Visible emissions tests, using DER method 9 testing, shall be conducted concurrently with the mass particulate sampling.
5. Quarterly reports of grit throughput shall be made to the Jacksonville Bio-Environmental Services Division.
6. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to the Jacksonville Bio-Environmental Services Division. Full operation of the source may then be conducted in compliance with terms of this permit until expiration of receipt of an operating permit.

Issued this 17 day of May, 1983

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ Pages attached.

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel  
FROM: Clair Fancy *Clair Fancy*  
DATE: May 10, 1983  
SUBJ: Approval of Air Construction Permit

RECEIVED  
MAY 16 1983

Office of the Secretary

Attached for your approval and signature is one Air Construction Permit for which the applicant is Jacksonville Shipyards Inc. The construction proposed is the retrofitting of air pollution abatement equipment to the applicant's existing grit storage and transfer unit in Jacksonville, Duval County, Florida.

Day 90, after which the permit would be issued by default, is May 31, 1983.

The Bureau recommends your approval and signature.

CF/pa

Attachment

DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES  
Bio-Environmental Services Division  
Air and Water Pollution Control

July 20, 1982



DER  
JUL 22 1982  
BAQM

Mr. John J. Sugrue  
Executive Vice President  
Jacksonville Shipyards Incorporated  
P.O. Box 2347  
Jacksonville, Florida 32203

Dear Mr. Sugrue:

It has come to the attention of the Bio-Environmental Services Division (BESD) that Jacksonville Shipyards Inc. (JSI) has modified their facility by returning one of their three drydocks to the Navy. It is further understood that JSI is seeking a \$30 million bond in order to buy a newer and larger drydock to replace the one returned to the Navy.

If indeed it is true that JSI intends to replace the returned drydock with a larger drydock, a permit to modify the JSI facility may be required pursuant to Section 17-2.210(1)FAC - "Permits Required". The referenced section of 17-2 FAC states "an air pollution Construction Permit shall be obtained by the owner or operator of any new or modified source prior to beginning construction in accordance with Chapter 17-2 Part V, and 17-4 FAC". Since the new drydock may represent a modification as defined by Section 17-2.100(102), "any physical change in or change in the method of operation of or addition to a stationary facility which increases the actual emissions of any pollutant regulated under this Chapter...", a permit to accomplish such needs to be addressed.

Further, if a permit is required to modify the facility, i.e., add the new drydock, JSI needs to address whether or not the emissions will increase over the level designated in Chapter 17-2, as "Significant Net Emissions Increase". It would appear that under Section 17-2.510(2) (d)4 FAC "Modifications to Major Facilities", JSI must establish whether the emissions from the new drydock will or will not exceed a significant net emission rate of 25 tons per year. If the emissions from the new drydock are equal to or greater than the 25 tons per year, such a modification (the proposed new drydock) would be subject to Section 17-2.510(4) FAC - "Preconstruction Review Requirements". The preconstruction review would require the incorporation of LAER, Statewide compliance, New Source Allowance/Emission Offsets and Net Air Quality Improvement prior to DER approving a permit for such a modification.

The most significant aspect of being subject to the "Preconstruction Review Requirements", would be that, pursuant to Section 17-2.640 FAC, an application to the Florida DER for determination of a Lowest Achievable Emission Rate, would be required.



DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DATE

KAHEL		FANCY		STARNES	
BLOMMEL		THOMAS		MARTY HALL	
BARKER		GEORGE		MARSHALL MOTT-SMITH	
J. ROGERS		PALAGYI		Steve	

REMARKS

*Evaluate what do you  
wsp to think?  
SSon  
Bill by Aug 12?  
Wat*

DISPOSITION

- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION

- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM:

STEVE SMALLWOOD

*JS*

DATE

7-90-82

PHONE



Naturally, should JSI be able to document that emissions will not increase, no further action would be required for the proposed new drydock. If such data exists, please forward a copy to this Agency for review, on or before August 20, 1982.

Otherwise, the above information regarding permitting of the proposed new drydock is forwarded to assist JSI in such an endeavor. Naturally, if a permit is required, it would be to JSI's benefit to initiate the process as soon as practical to insure that a permit can be obtained prior to installation of the drydock.

JSI's and your cooperation in this matter will be appreciated. If there are any questions on this issue, please contact this Office at your convenience.

Very truly yours,

Robert S. Pace, P.E.  
Air Pollution Engineer

RSP/vj

cc: Mr. Doug Dutton - DER  
✓cc: Mr. Steve Smallwood, P.E. - DER Tallahassee

DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES  
Bio-Environmental Services Division  
Air and Water Pollution Control

DER  
MAR 07 1983  
BAQM



March 3, 1983

Mr. James T. Wilburn  
Chief - Air Management Branch  
U. S. Environmental Protection Agency  
Region IV  
345 Courtland NE  
Atlanta, Georgia 30365

Dear Mr. Wilburn:

The Bio-Environmental Services Division (BESD) appreciated the opportunity to attend the Environmental Protection Agency's (EPA) Air Compliance Workshop in Orlando, Florida in February of this year. The workshop was quite informative and proved a very necessary media of information essential to helping this Agency in developing compliance strategies.

In this vain, I would like to take this opportunity to request assistance through your office for the National Enforcement Investigation Center to provide our Agency with various types of information relative to abrasive grit blasting. The information being requested revolves around:

- A. What types of abrasive grit blasting control technology are the NEIC aware of being currently utilized throughout the United States?
- B. The corporate structure and fiscal status of Fruehauf Corporation, Jacksonville Shipyards, Inc., and Key Houston, Inc.

It is felt that this information will be of great assistance to this Agency in its future efforts in developing or assisting in the development of a State RACT regulation to abate emissions from abrasive grit blasting facilities. This information, in conjunction with technical assistance to be obtained shortly, should augment and expedite efforts for RACT development.

EPA's and your continued cooperation and consideration of this request for assistance is greatly appreciated. If additional information or clarification is necessary, please contact me at your convenience.

Very truly yours,

Robert Steven Pace, P. E.  
Bio-Environmental Engineer

RSP/am

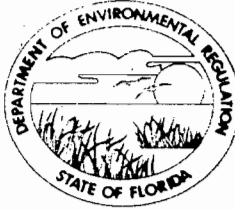
cc: Steve Smallwood, P. E. - DER



AREA CODE 904 / AIR POLLUTION — 633-3033 OR 633-3303 / WATER POLLUTION — 633-3415  
515 WEST 6TH STREET / JACKSONVILLE, FLORIDA 32206—4397

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

April 25, 1983

Mr. J. Madison Smith  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Smith:

Jacksonville Shipyards, Inc.  
Grit Transfer and Storage Facility  
AC 16-58684

On March 25, 1983, the Bureau of Air Quality Management requested that you publish, at your expense, a notice of the department's intent to issue a permit for the above referenced application. The bill for this notice was inadvertently sent to the DER Purchasing Office. I am returning a copy of the bill (attached) for you to handle in the event that you did not receive one.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa

Attachment

BEST AVAILABLE COPY



# The Florida Times-Union · Jacksonville Journal

ONE RIVERSIDE AVENUE / POST OFFICE BOX 1949 / JACKSONVILLE, FLORIDA 32201 / AREA CODE 904 791-4111

Jacksonville Shipyards

P/O Box 2347

Jacksonville, Florida 32202

DER  
APR 25 1983  
BAQ

Receipts given and advertising copy received subject to review, revision and approval by Florida Publishing Company and other conditions on rate card.

337801

JAC

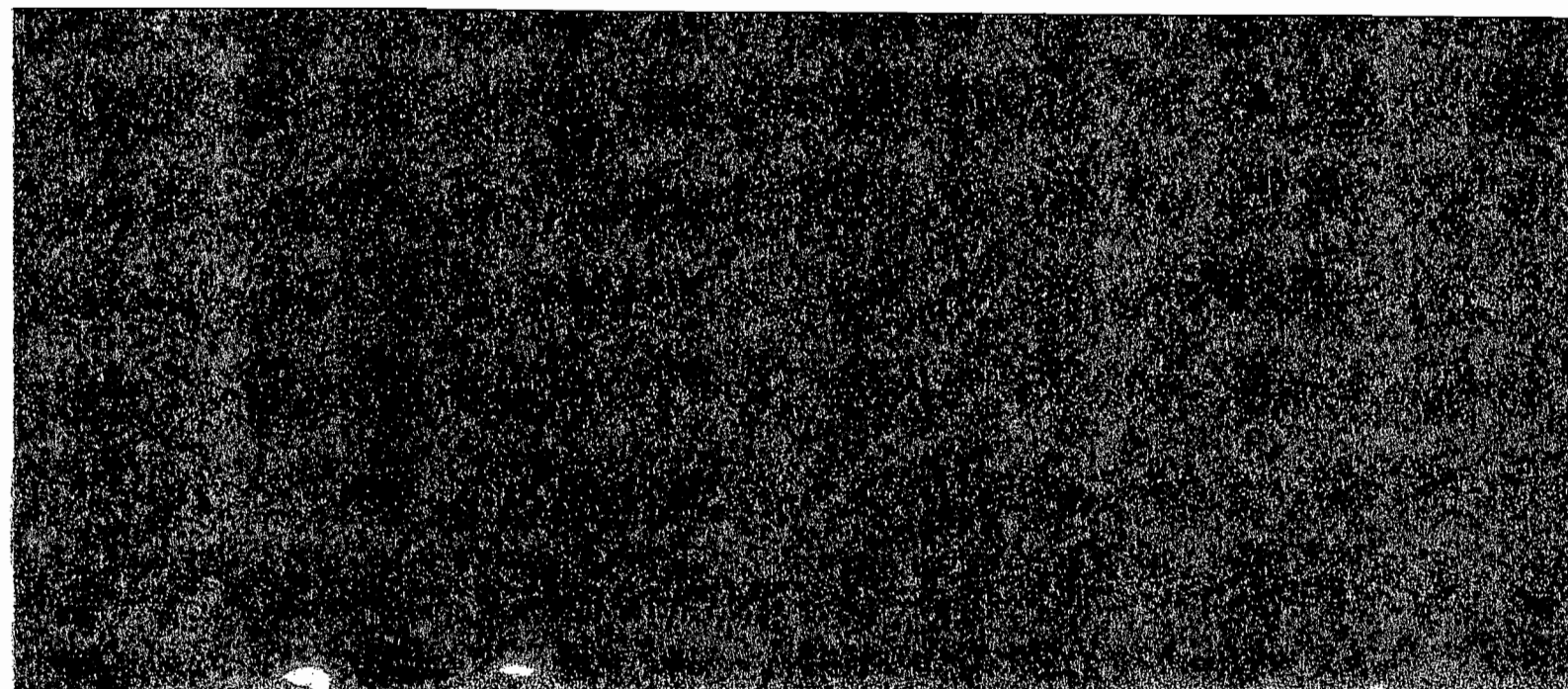
393409

DATE	LINES	INCHES	TIMES	RATE	AMOUNT	TOTAL AMOUNT
April 7, 1983	TU Legal	4 1/2	1	12.86		57.87

0272  
7920  
9403

PLEASE RETURN THIS STATEMENT WITH REMITTANCE TO ASSURE PROPER CREDIT

1437





FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared \_\_\_\_\_

George A. Dan \_\_\_\_\_ who on oath says that he is

Retail Advertising Supervisor \_\_\_\_\_ of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a \_\_\_\_\_

Legal Notice

in the matter of \_\_\_\_\_ Notice of proposed agency action

in the \_\_\_\_\_ Court,

was published in \_\_\_\_\_ The Florida Times Union

in the issues of \_\_\_\_\_ April 7, 1983

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval 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 said newspaper.

Sworn to and subscribed before me this 7th day of

April A.D. 19 83
Maoru S. King

Notary Public, State of Florida at Large.

My Commission Expires July 9, 1986

Handwritten signature of George A. Dan

NOTICE OF PROPOSED AGENCY ACTION
The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Shipyards, Inc. for the construction of pollution control abatement equipment on its existing grit transfer and storage unit of its facility in Jacksonville, Duval County. A determination of Best Available Control Technology (BACT) was not required. Any person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes. The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations: DER Bureau of Air Quality Management, 2600 Blair Stone Road, Tallahassee, Florida 32301; DER Northeast District Office, 3426 Bills Road, Jacksonville, Florida 32207; City of Jacksonville Bio-Environmental Services Division, 515 West Sixth Street, Jacksonville, Florida 32206. Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.

RECEIVED
APR 20 1983
D.E.R. Bureau of Accounting and Budgeting

<b>ROUTING AND TRANSMITTAL SLIP</b>	ACTION NO.
	ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) <i>Bill Thomas</i>	INITIAL
	DATE
2.	INITIAL
	DATE
3.	INITIAL
	DATE
4.	INITIAL
	DATE

REMARKS:

<p style="text-align: right;"><b>WOM</b> APR 20 1983 <b>DEF R</b></p>	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 & REPT	
INITIAL & FORWARD	
DISTRIBUTE	
CONCURRENCE	
FOR PROCESSING	
INITIAL & RETURN	

FROM: <i>Bill Thomas</i>	DATE
	PHONE

<b>ROUTING AND TRANSMITTAL SLIP</b>	ACTION NO.
	ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) <i>Patsy Adams</i>	INITIAL
	DATE
2.	INITIAL
	DATE
3.	INITIAL
	DATE
4.	INITIAL
	DATE

REMARKS:

*Copy  
Per your Request*

<p style="text-align: right;"><b>WOM</b> APR 20 1983 <b>DEF R</b></p>	INFORMATION
	REVIEW & RETURN
	REVIEW & FILE
	INITIAL & FORWARD
	DISPOSITION
	REVIEW & RESPOND
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INITIAL & FORWARD	
DISTRIBUTE	
CONCURRENCE	
FOR PROCESSING	
INITIAL & RETURN	

FROM:	DATE
	PHONE

# DAN FARLEY & ASSOCIATES

April 11, 1983

Mr. John Svec  
Department of Environmental  
Regulation  
Bureau of Air Quality  
Sixth Floor  
2600 Blair Stone Road  
Tallahassee, Florida 32301

DER  
APR 14 1983  
BAQM

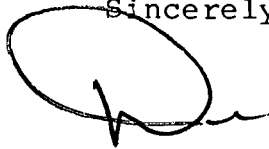
Dear John:

RE: Jacksonville Shipyards  
Application No. AC16-58684

As we discussed today, the technical evaluation and proposed permit is acceptable to Jacksonville Shipyards as written with the exception on page 1 of 6, ¶2, wherein the language should reflect the 700 ton grit storage silo as an existing structure.

Also attached is proof of publication for legal notice requirements.

Sincerely,



Dan Farley

cc: Madison Smith  
Doug Chunn  
Bob Sholtes



FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared \_\_\_\_\_

George A. Dan

who on oath says that he is

Retail Advertising Supervisor

of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a \_\_\_\_\_

Legal Notice

in the matter of Notice of proposed agency action

in the \_\_\_\_\_ Court,

was published in The Florida Times Union

in the issues of April 7, 1983

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval 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 said newspaper.

Sworn to and subscribed before me

this 7th day of

April A.D. 19 83

Notary Public, State of Florida at Large.

Handwritten signature of George A. Dan

My Commission Expires Notary Public, State of Florida

My Commission Expires July 9, 1986

NOTICE OF PROPOSED AGENCY ACTION
The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Shipyards, Inc. for the construction of pollution control abatement equipment on its existing grill transfer and storage unit at its facility in Jacksonville, Duval County. A determination of Best Available Control Technology (BACT) was not required.
Any person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.
The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:
DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
DER Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207
City of Jacksonville
Bio-Environmental Services Division
515 West Sixth Street
Jacksonville, Florida 32206
Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.



cc: Doug Dutton - DER  
Madison Smith - JSI

**DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES**  
Bio-Environmental Services Division  
Air and Water Pollution Control

April 1, 1983



Mr. C. H. Fancy, P. E.  
Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blainstone Road  
Tallahassee, Florida 32301

DER

APR 05 1983

Re: Jacksonville Shipyards, Inc.  
File #58684-BAQM

Dear Mr. Fancy:

Bio-Environmental Services Division (BESD) has reviewed the Technical Evaluation and Preliminary Determination dated February 22, 1983 and revised March 25, 1983 concerning the referenced Construction Permit application. This Agency offers the following comments:

(1) It is noted that Jacksonville Shipyards, Inc., (JSI) is a major facility as defined in Florida Administrative Code (FAC), Rule 17-2.100(95). Although there is some debate as to the quantities of particulate matter emissions (greater or less than 100 Tons/yr), it has been determined that JSI emits greater than 100 Tons/yr of Volatile Organic Compounds.

(2) In regards to the question of an Operation Permit versus a Construction Permit, Chapter 17-2.650(2)(f)4.b.i. clearly states that a Construction Permit application shall be filed. Chapter 17-2.210(2) states that "Subsequent to construction and compliance testing, each source shall obtain an Operation Permit in accordance with Chapter 17-2 and 17-4 FAC". This action necessitates the filing of an Operation Permit application or Certificate of Completion of Construction and processing fee.

Your consideration of the comments provided is requested. A specific response as to how the Department expects to address these issues in the final permit is requested. If I may be of further assistance, please advise.

Very truly yours,

Robert Steven Pace, P. E.  
Bio-Environmental Engineer

RSP/JEW/am



No. 0157997  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

SENT TO		Mr. J. Madison Smith	
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$	
	SPECIAL DELIVERY	\$	
	RESTRICTED DELIVERY	\$	
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	\$
		SHOW TO WHOM AND DATE DELIVERED	\$
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY		\$	
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$	
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		3/25/83	

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.  
 Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
 Show to whom and date delivered.....¢  
 Show to whom, date and address of delivery.....¢  
 RESTRICTED DELIVERY  
 Show to whom and date delivered.....¢  
 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery.\$ \_\_\_\_  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Mr. J. Madison Smith  
 P. O. Box 2347  
 Jacksonville, FL 32203

3. ARTICLE DESCRIPTION:  

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157997	

 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*Alma Clark*

4. DATE OF DELIVERY  
 MAR 28 1983

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:  
 INITIALS

JACKSONVILLE, FL GENERAL MAIL CIR  
 MAR 28 1983  
 127 USPO  
 CLERK'S INITIALS

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

March 25, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. J. Madison Smith  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Smith:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit for the addition of pollution control equipment on the grit transfer and storage facility in Jacksonville, Duval County, Florida.

Before final action can be taken on your proposed permit, you are required by Florida Administrative Code Rule 17-1.62(3) to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Duval County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice will be grounds for denial of the permit.

The Preliminary Determination and proposed permit constitute a proposed action of the department and is subject to administrative hearing under the provisions of Chapter 120, Florida Statutes, if requested within fourteen days from receipt of this letter. Any petition for hearing must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed with the Office of General Counsel, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to file a request for hearing within fourteen days shall constitute a waiver of your right to a hearing. Filing is deemed complete upon receipt by the Office of General Counsel.

Mr. J. Madison Smith  
March 25, 1983  
Page Two

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Bill Thomas of the Bureau of Air Quality Management.

Sincerely,



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa

Attachment

cc: Dr. Robert S. Sholtes, P.E., Sholtes and Koogler  
Environmental Consultants  
Mr. Dan Farley, Dan Farley and Associates  
Mr. John Ketteringham, DER Northeast District  
Mr. Jerry E. Woosley, Jacksonville Bio-Environmental  
Services Division  
Mr. Douglas D. Chunn, Commander Legler

AMENDMENT  
TECHNICAL EVALUATION  
and  
PRELIMINARY DETERMINATION

Jacksonville Shipyards, Inc.  
Duval County, Florida

Application Number: AC 16-58684

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

March 25, 1983

## NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Shipyards, Inc. for the construction of pollution control abatement equipment on its existing grit transfer and storage unit at its facility in Jacksonville, Duval County. A determination of Best Available Control Technology (BACT) was not required.

Any person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

DER Northeast District Office  
3426 Bills Road  
Jacksonville, Florida 32207

City of Jacksonville  
Bio-Environmental Services Division  
515 West Sixth Street  
Jacksonville, Florida 32206

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

**28-5.15 Requests for Formal and Informal Proceedings**

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

## I. PROJECT DESCRIPTION

### A. Applicant

Jacksonville Shipyards, Inc.  
Shop Road  
Post Office Box 2347  
Jacksonville, Florida 32203

### B. Project and Location

The applicant's proposed project consists of retrofitting air pollution abatement equipment to an existing grit storage and transfer unit. The facility is located on Shop Road in Jacksonville, Duval County. The UTM coordinates of the source are: Zone 17, 430.990 km East, 3354.411 km North.

### C. Process Description and Controls

The handling system will receive grit in a railcar/truck receiving building which will be enclosed. The grit will be transferred by an enclosed conveyor system to a bucket elevator. The bucket elevator will load a 700 ton storage silo at a rate of 80,000 pounds per hour. The grit will then be loaded from the storage silo into transport containers in which the grit will be carried to the sandblasting equipment.

All the transfer points will be vented to DeVansco venturi particulate scrubbers. Emissions of particulate matter shall not exceed 0.03 grains/standard cubic foot. Discharge from the scrubbers will be disposed of in an approved dumping area.

## II. RULE APPLICABILITY

The proposed project is located in an area designated as nonattainment for particulate matter and ozone according to Florida Administrative Code Rule 17-2.410. It is also located in an area designated as unclassifiable for sulfur dioxide according to Florida Administrative Code Rule 17-2.430. The project is located in an area classified as attainment for the remaining criteria pollutants.

The project is proposed to meet the requirements of Florida Administrative Code Rule 17-2.650(2)(c)11., Specific RACT Emission Limiting Standards for material handling, sizing, screening, crushing and grinding operations and a requirement in operating permit number AO 16-40678.



### III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

#### A. Emission Limitations

The pollutant emitted during the transfer operations is particulate matter. Filter system number 1 will be in operation when the grit receiving transporter is being filled. Both filter system number 1 and filter system number 2 will be in operation when the silo is being loaded from the railcar/truck receiving building.

Emission Source		
Source	Emission Limitation	Maximum Emission Rate - lb/hr
Filter System #1	0.03gr/dscf	1.93
Filter System #2	0.03gr/dscf	1.93

Visible emissions shall not be greater than 5 percent opacity

#### B. Air Quality Analysis

Particulate matter emissions will decrease, therefore, an ambient air quality analysis is not required.

### IV. CONCLUSIONS

The emissions limitation of 0.03 grains/dscf and the visible emission limitation not greater than 5 percent opacity complies with the requirements of reasonably available control technology (RACT) contained in Florida Administrative Code Rule 17-2.650(2)(c)11.b.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
Jacksonville Shipyard, Inc.  
P. O. 2347  
Jacksonville, FL 32203

Permit Number: AC 16-58684  
Expiration Date: September 30, 1983  
County: Duval  
Latitude/Longitude: 30° 19' 20"N/  
81° 38' 30.1" W  
Project: Grit Storage Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 a railcar/truck grit receiving building and transfer system and a 700 ton grit storage silo to be located at the Jacksonville Shipyards on Shop Road, Jacksonville. The UTM's of the proposed facility are Zone 17, 437.990 km East and 3354.411 km North.

Construction shall be in accordance with the attached permit application, plans, documents, and drawings except as otherwise noted on pages 3 and 4 -"Specific Conditions".

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16).
2. Response to incompleteness letter received January 4, 1983.
3. Request for changes to preliminary determination received March 18, 1983.

PERMITTEE:  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, Fl 32203

I. D. Number:  
Permit Number: AC 16-58684  
Expiration Date: Sept. 30, 1983

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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:**  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, Fl 32203

**I. D. Number:**  
**Permit Number:** AC 16-58684  
**Expiration Date:** Sept. 30, 1983

**GENERAL CONDITIONS:**

6. The permittee shall at all times 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, 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 the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- 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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; 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.

PERMITTEE:  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, FL 32203

I. D. Number:  
Permit Number: AC 16-58684  
Date of Issue:  
Expiration Date: Sept. 30, 1983

**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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, FL 32203

**I. D. Number:**  
**Permit Number:** AC 16-58684  
**Expiration Date:** Sept. 30, 1983

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 measurements;
  - the person responsible for performing the sampling or measurements;
  - 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.

15. 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 submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. Maximum particulate matter emission shall be:

Source	Emission Limitation	Maximum Emission Rate (lb/hr)
Filter system #1	0.03 gr/dscf	1.93
Filter system #2	0.03 gr/dscf	1.93

2. Visible emissions shall not exceed five percent opacity.

**PERMITTEE:**  
Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, FL 32203

**I.D. Number:**  
Permit Number: AC 16-58684  
Expiration Date: Sept. 30, 1983

**SPECIFIC CONDITIONS:**

3. Maximum silo loading rate shall be 40 tons per hour of grit.
4. Compliance with the emission limitations shall be determined by mass particulate matter sampling using DER method 5 for the transfer facilities. Visible emissions tests, using DER method 9 testing, shall be conducted concurrently with the mass particulate sampling.
5. Quarterly reports of grit throughput shall be made to the Jacksonville Bio-Environmental Services Division.
6. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to the Jacksonville Bio-Environmental Services Division. Full operation of the source may then be conducted in compliance with terms of this permit until expiration of receipt of an operating permit.

Issued this \_\_\_\_\_ day of \_\_\_\_\_, 1983

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ Pages attached.

COMMANDER LEGLER WERBER DAWES & SADLER

PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

2000 INDEPENDENT SQUARE

JACKSONVILLE, FLORIDA 32202-5055

March 17, 1983

STEVEN A. WERBER  
CHARLES E. COMMANDER III  
MITCHELL W. LEGLER  
MICHAEL F. DAWES  
LUTHER F. SADLER, JR.  
KENNETH N. FINK  
DOUGLAS D. CHUNN  
JOHN M. WELCH, JR.  
E. ROBERT MEEK  
ROBERT A. HEEKIN  
DAVID H. PEEK  
CHARLES V. HEDRICK  
LINDA Y. KELSO  
FREDERICK M. WILLIAMS  
NANCY T. BOWEN

TELEPHONE:  
(904) 359-2000

TELEX:  
56-320 COMLAW JAX

DER  
MAR 18 1983  
BAQM

Mr. C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Dept. of Environmental Regulation  
State of Florida  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

Re: Application #AC 16-58684

Dear Mr. Fancy:

As you know, at the request of Jacksonville Shipyards, Inc. (JSI) we met in Tallahassee on March 7, 1983 to discuss the proposed conditions in the permit which the Department proposed to issue. Although due to the numerous factual errors and other problems contained in the proposed permit and accompanying documents we requested that you simply retract it, you have requested, on the basis of departmental policy, that we request an extension of time within which to request a hearing to object to the proposed permit and that we respond to the proposed permit documents with our comments.

Throughout the permit documents you have treated the modification as a "new source" which is simply not correct. In fact, it is a minor modification to an existing facility. For example, under paragraph I.B. of the proposed permit it refers to "constructing a grit storage and transfer unit at their existing facility to replace the existing open grit storage system" which is not correct. There is an existing enclosed grit storage system.

In the second full paragraph under paragraph II. the Department has declared JSI as a major emitting facility as defined in FAC Rule 17-2.100(95), yet no determination through



Mr. C. H. Fancy, P.E.  
March 17, 1983  
Page Two

objective scientific data has ever been revealed to support that declaration. The fact that one may intuitively feel that it is a major emitting facility does not justify stating it as an accomplished fact in this official document.

We also do not agree that there is any need for an exemption from the new source review referred to in paragraph II since there is no concession that it is a new source.

We suggest that the reference to "annual emission rate" in paragraph III.A. should be clarified to refer to the annual emission rate of the storage silo only. Additionally, the annual grit consumption figure which was almost exceeded during one quarter last year, should be removed.

In paragraph III.B. the phrase "entails going from open storage to a silo" should be deleted since it is factually incorrect.

In the conclusion section the last sentence should be removed. There is no definition given for "annual throughput" nor is there any base line established to which later calculations could be compared. In addition, as we agreed during the meeting there is no standard at present which correlates input to actual emission rate when used in connection with abrasive grit blasting. As we agreed during the meeting, the so-called annual input or throughput limitations should be removed from this application and permit documents which relate solely to the storage silo modifications and not to the JSI facility and abrasive grit blasting in general. JSI is not totally opposed to an appropriate annual throughput limit, however, we feel that this issue should be resolved in some other proceeding and not in connection with this silo permit.

The provisions on page 1 of the permit must be changed to reflect that the work consists of a modification of our existing storage system and not the construction of a new one.

On page 4 of 4 of the permit, in paragraph 5, the reference to "materials input limitations" should be deleted for the reasons previously set forth. Also the onerous hourly operation reports should be changed to that which is necessary, i.e. the total amount of grit unloaded per quarter as we now report.

Mr. C. H. Fancy, P.E.  
March 17, 1983  
Page Three

It is our understanding that this source falls under Section 11 Materials Handling, etc. of the RACT rule and further is one of those sources in this category which existed at the time of RACT promulgation but was not permitted. The RACT rule recognizes this situation and requires that permits be issued with the regulation suggesting that they be operating permits. Following the requirements of 17-2.650(2)(d) it is recognized that a need exists to establish a permitted operating schedule (hr/day, day/wk, wk/yr). Due to the intermittent nature of the grit blasting operations, this schedule should cover a time period of 10 hours/day, 6 days/week and 52 weeks/year. This schedule will allow the operations to take place as required. Additionally, this schedule if fully utilized would theoretically allow emissions of 4.5 tons/year.

Finally, with reference to paragraph 6 on page 4 of 4 we fail to see the necessity of completing and submitting to the Bio-Environmental Services Division (BESD) an application for an operating permit. This improvement of our system, resulting in decrease of emissions of JSI from the silo, was previously agreed to by the BESD at the time of issuance of permit #AO 16-40678. Consequently, I would respectfully request that you consider issuing an operating permit rather than just a construction permit and that its expiration date be extended beyond September 30, 1983.

For your convenience we have enclosed a proposed form of permit documents which incorporate the various changes referred to above. We appreciate the opportunity of meeting with you and your staff recently and will be happy to discuss any of the above matters at your convenience.

Very truly yours,



Douglas D. Chunn

DDC/sj

*this they  
have to do  
NO.*

TECHNICAL EVALUATION  
and  
PRELIMINARY DETERMINATION

Jacksonville Shipyards, Inc.  
Duval County, Florida

Application Number: AC 16-58684

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

February 22, 1983

**BEST AVAILABLE COPY**

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Shipyards, Inc. for the addition of air pollution abatement equipment to its existing grit storage and transfer unit at its facility in Jacksonville, Duval County. A determination of Best Available Control Technology (BACT) was not required.

Any person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

DER Northeast District Office  
3426 Bills Road  
Jacksonville, Florida 32207

City of Jacksonville  
Bio-Environmental Services Division  
515 West Sixth Street  
Jacksonville, Florida 32206

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

I. PROJECT DESCRIPTION

A. Applicant

Jacksonville Shipyards, Inc.  
Shop Road  
Post Office Box 2347  
Jacksonville, Florida 32203

B. Project and Location

The applicant's proposed project consists of retrofitting air pollution abatement equipment to an existing grit storage and transfer unit at their facility located on Shop Road in Jacksonville, Duval County. The UTM coordinates of the source are: Zone 17, 430.990 km East, 3354.411 km North.

C. Process Description and Controls

The handling system will receive grit in a railcar/truck receiving building which will be enclosed. The grit will be transferred by an enclosed conveyor system to a bucket elevator. The bucket elevator will load a 700 ton storage silo at a rate of 80,000 pounds per hour. The grit will then be loaded from the storage silo into transport containers in which the grit will be carried to the sandblasting equipment.

All the transfer points will be vented to DeVansco venturi particulate scrubbers. Emissions of particulate matter shall not exceed 0.03 grains/standard cubic foot. Discharge from the scrubbers will be disposed of in an approved dumping area.

II. RULE APPLICABILITY

The proposed project is located in an area designated as nonattainment for particulate matter and ozone according to Florida Administrative Code Rule 17-2.410. It is also located in an area designated as unclassifiable for sulfur dioxide according to Florida Administrative Code Rule 17-2.430. The project is located in an area classified as attainment for the remaining criteria pollutants.

The project is proposed to meet the requirements of Florida Administrative Code 17-2.650(2)(c)11., Specific RACT Emission Limiting Standards for material handling, sizing, screening, crushing and grinding operations and a requirement in operating permit number AO 16-40678.

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

A. Emission Limitations

The pollutant emitted during the transfer operations is particulate matter. Filter system number 1 will be in operation when the grit receiving transporter is being filled. Both filter system number 1 and filter system number 2 will be in operation when the silo is being loaded from the railcar/truck receiving building.

Emission Source

Source	Emission Limitation	Maximum Emission Rate - lb/hr
Filter System #1	0.03gr/dscf	1.93
Filter System #2	0.03gr/dscf	1.93

Visible emissions shall not be greater than 5 percent opacity

The annual emission rate from the silo is based upon continuous operation.

B. Air Quality Analysis

Particulate matter emissions will decrease, therefore, an ambient air quality analysis is not required.

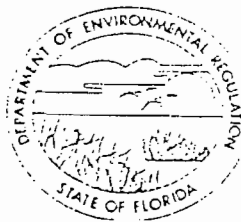
IV. CONCLUSIONS

The emissions limitation of 0.03 grains/dscf and the visible emission limitation not greater than 5 percent opacity complies with the requirements of reasonably available control technology (RACT) contained in Florida Administrative Code Rule 17-2.650(2)(c)11.b.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of Chapter 17-2, FAC.

## DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

PERMITTEE: Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

Permit/Certification Number: AC 16-58684  
Date of Issue:  
Expiration Date: September 30, 1983  
County: Duval  
Latitude/Longitude: 30° 19' 20"N/81° 38' 30.1"W  
Section/Township/Range:  
Project: Grit Storage Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 addition of air pollution abatement equipment to an existing railcar/truck grit receiving building and transfer system and 700 ton grit storage silo at the Jacksonville Shipyards on Shop Road, Jacksonville. The UTM's of the proposed facility are Zone 17, 437.990 km East and 3354.411 km North.

Additions shall be in accordance with the attached permit application, plans, documents, and drawings except as otherwise noted on pages 3 and 4 - "Specific Conditions".

Attachments are as follows:

1. Application to modify existing Air Pollution Sources, DER Form 17-1.122(16).
2. Response to incompleteness letter received January 4, 1983

DER Form 17-1.201(5) Effective November 30, 1982

Page 1 of 4



**BEST AVAILABLE COPY**

PERMITTEE: Jacksonville Shipyards, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

I.D. Number:  
Permit/Certification Number: AC 16-58684  
Date of Issue:  
Expiration Date: September 30, 1983

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, and 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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 acknowledgement of title and does not constitute authority for the use of submerged lands unless herein provided and the necessary title and 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, animals, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permit source, 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 at all times 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, 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 the permit;
  - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
  - 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 notify and provide the department with the following information:
  - a. a description of and cause of non-compliance; and

# BEST AVAILABLE COPY

PERMITTEE: Jacksonville, Shipyards, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

I.D. Number:  
Permit/Certification Number: AC 16-98684  
Date of Issue:  
Expiration Date: September 30, 1983

b. the period of noncompliance, including exact 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 non-compliance.

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time of 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 Rule 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
  - a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department during the course of any unresolved enforcement action.
  - b. The permittee shall retain 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 of continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 measurements;
    - the person responsible for performing the sampling or measurements;
    - 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.
15. 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 and information shall be submitted or corrected promptly.

PERMITTEE: Jacksonville Shipyards, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

Expiration Date:

SPECIFIC CONDITIONS:

1. Maximum particulate matter emissions shall be:

Source	Emission Limitation	Maximum Emission Rate (lb/hr)
Filter system #1	0.03 gr/dscf	1.93
Filter system #2	0.03 gr/dscf	1.93

2. Visible emissions shall not exceed five percent opacity.

3. Maximum silo loading rate shall be 40 tons per hour of grit.

4. Compliance with the emission limitations shall be determined by mass particulate matter sampling using DER method 5 for the transfer facilities. Visible emissions tests, using DER method 9 testing, shall be conducted concurrently with the mass particulate sampling.

5. Quarterly reports of grit throughput shall be made to the Jacksonville Bio-Environmental Services Division.

Issued this \_\_\_\_ day of \_\_\_\_\_, 1983

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL  
REGULATION

---

\_\_ pages attached.

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: <u>J. Svec</u>	Loctn.:	
To: _____	Loctn.:	
To: _____	Loctn.:	
From: _____	Date:	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Steve Pace, Jacksonville Bio-Environmental Services  
FROM: Clair Fancy, BAQM *CF*  
DATE: March 17, 1983  
SUBJ: Jacksonville Shipyards Grit Storage Silo

On Monday, March 7, Madison Smith, Dan Farley, and an attorney representing the shipyards, came over here to discuss the preliminary determination for the grit storage silo. They objected to a limitation on the amount of grit utilization, the statements in the preliminary determination about being a major facility, and several other items. They did not object to the emission limitations in the permit as required by the particulate RACT rules. Typical Jacksonville Shipyards.

We finally agreed to give them a waiver for their right to request a hearing until April 21. They will provide us with detailed comments as to what they want changed in the preliminary determination and the permit. My general feeling on this issue is that I would be willing to change the wording as long as it did not imply that they are not a major facility or any other word change that might compromise our position later.

I feel that when the EPA concludes its investigation of site 004, and once the technology review is completed for open air grit blasting, that Jacksonville BES and the DER will be able to resolve this issue in a satisfactory manner, even if it means going into the legal arena to accomplish that goal.

CHF/ks

cc: Bill Thomas  
John Svec

No. 0157974  
 RECEIPT FOR CERTIFIED MAIL  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

SENT TO		Mr. J. J. Sugrue	
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	¢
		SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢	
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		2/22/83	

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

Ⓢ SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
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 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery. ¢

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2. ARTICLE ADDRESSED TO:  
 Mr. J. J. Sugrue  
 P. O. Box 2347  
 Jacksonville, FL 32203


3. ARTICLE DESCRIPTION:  

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157974	

 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*Alia Clark*

4. DATE OF DELIVERY  
 FEB 23 1983

5. ADDRESS (Complete only if returned)  


6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS \_\_\_\_\_

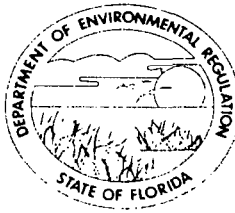
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★EPO: 1979-300-459

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

February 22, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. J. J. Sugrue  
Executive Vice President  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Sugrue:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit for the construction of a grit transfer and storage facility in Jacksonville, Duval County, Florida.

Before final action can be taken on your proposed permit, you are required by Florida Administrative Code Rule 17-1.62(3) to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Duval County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice will be grounds for denial of the permit.

The Preliminary Determination and proposed permit constitute a proposed action of the department and is subject to administrative hearing under the provisions of Chapter 120, Florida Statutes, if requested within fourteen days from receipt of this letter. Any petition for hearing must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed with the Office of General Counsel, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to file a request for hearing within fourteen days shall constitute a waiver of your right to a hearing. Filing is deemed complete upon receipt by the Office of General Counsel.

Mr. J. J. Sugrue  
February 22, 1983  
Page Two

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Bill Thomas of the Bureau of Air Quality Management.

Sincerely,



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa

Attachment

cc: Dr. Robert S. Sholtes, P.E., Sholtes & Koogler  
Environmental Consultants  
Mr. Dan Farley, Dan Farley and Associates  
Mr. John Ketteringham, DER Northeast District  
Mr. Jerry Woosley, Jacksonville Bio-Environmental  
Services Division

TECHNICAL EVALUATION  
and  
PRELIMINARY DETERMINATION

Jacksonville Shipyards, Inc.  
Duval County, Florida

Application Number: AC 16-58684

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

February 22, 1983



NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to Jacksonville Shipyards, Inc. for the construction of a grit transfer and storage facility at its facility in Jacksonville, Duval County. A determination of Best Available Control Technology (BACT) was not required.

Any person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

DER Northeast District Office  
3426 Bills Road  
Jacksonville, Florida 32207

City of Jacksonville  
Bio-Environmental Services Division  
515 West Sixth Street  
Jacksonville, Florida 32206

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

## I. PROJECT DESCRIPTION

### A. Applicant

Jacksonville Shipyards, Inc.  
Shop Road  
Post Office Box 2347  
Jacksonville, Florida 32203

### B. Project and Location

The applicant's proposed project consists of constructing a grit storage and transfer unit at their existing facility to replace the existing open grit storage system. The facility is located on Shop Road in Jacksonville, Duval County. The UTM coordinates of the source are: Zone 17, 430.990 km East, 3354.411 km North.

### C. Process Description and Controls

The handling system will receive grit in a railcar/truck receiving building which will be enclosed. The grit will be transferred by an enclosed conveyor system to a bucket elevator. The bucket elevator will load a 700 ton storage silo at a rate of 80,000 pounds per hour. The grit will then be loaded from the storage silo into transport containers in which the grit will be carried to the sandblasting equipment.

All the transfer points will be vented to DeVansco venturi particulate scrubbers. Emissions of particulate matter will be controlled to less than 0.03 grains/standard cubic foot. Discharge from the scrubbers will be disposed of in an approved dumping area.

## II. RULE APPLICABILITY

The proposed project is located in an area designated as nonattainment for particulate matter and ozone according to Florida Administrative Code Rule 17-2.410. It is also located in an area designated as unclassifiable for sulfur dioxide according to Florida Administrative Code Rule 17-2.430. The project is located in an area classified as attainment for the remaining criteria pollutants.

The Jacksonville Shipyards is a major emitting facility as defined in Florida Administrative Code Rule 17-2.100(95) for the criteria pollutant particulate matter. The project is proposed to meet the requirements of Florida Administrative Code Rule 17-2.650(2)(c)11., Specific RACT Emission Limiting

Standards for material handling, sizing, screening, crushing and grinding operations and a requirement in operating permit number AO 16-40678. The project is a modification to a major facility. Since net emissions will decrease, the project is exempt from the requirements of the new source review for nonattainment areas according to Florida Administrative Code Rule 17-2.510 (2)(d)4.

### III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

#### A. Emission Limitations

The pollutant emitted during the transfer operations is particulate matter. The particulate matter emissions generated during the unloading and transfer operations were estimated based upon the control efficiency of the venturi scrubber. Filter system number 1 will be in operation when the grit receiving transporter is being filled. Both filter system number 1 and filter system number 2 will be in operation when the silo is being loaded from the railcar/truck receiving building.

Source	Emission Limitation	Maximum Emission Rate - lb/hr
Filter System #1	0.03gr/dscf	1.93
Filter System #2	0.03gr/dscf	1.93

Visible emissions shall be less than 5 percent opacity

The annual emission rate is based upon continuous operation. In the permit application, potential annual emissions are based upon 18,000 tons of grit consumed each year and a silo loading rate of 40 tons per hour.

#### B. Air Quality Analysis

Particulate matter emissions will decrease, since this project entails going from open storage to a silo. Therefore, an ambient air quality analysis is not required.

### IV. CONCLUSIONS

The emissions limitation of 0.03 grains/dscf and the visible emission limitation of less than 5 percent opacity complies with the requirements of reasonably available control technology (RACT) contained in Florida Administrative Code Rule 17-2.650(2)(c)11.b. Annual throughput must be limited to avoid increases in annual emission rate.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

PERMITTEE: Jacksonville Shipyard, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

Permit/Certification Number: AC 16-58684  
Date of Issue:  
Expiration Date: September 30, 1983  
County: Duval  
Latitude/Longitude: 30° 19' 20"N / 81° 38' 30.1"W  
Section/Township/Range:  
Project: Grit Storage Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 a railcar/truck grit receiving building and transfer system and a 700 ton grit storage silo to be located at the Jacksonville Shipyards on Shop Road, Jacksonville. The UTM's of the proposed facility are Zone 17, 437.990 km East and 3354.411 km North.

Construction shall be in accordance with the attached permit application, plans, documents, and drawings except as otherwise noted on pages 3 and 4 - "Specific Conditions".

Attachments are as follows:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16).
2. Response to incompleteness letter received January 4, 1983

PERMITTEE: Jacksonville Shipyards, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

I.D. Number:  
Permit/Certification Number: AC 16-58684  
Date of Issue:  
Expiration Date: September 30, 1983

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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 at all times 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, 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 the permit;
  - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
  - 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 notify and provide the department with the following information:
  - a. a description of and cause of non-compliance; and

PERMITTEE: Jacksonville, Shipyards, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

I.D. Number:  
Permit/Certification Number: AC 16-58684  
Date of Issue:  
Expiration Date: September 30, 1983

b. the period of noncompliance, including exact 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.

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
  - a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
  - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 measurements;
    - the person responsible for performing the sampling or measurements;
    - 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.
15. 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 submitted or corrected promptly.



PERMITTEE: Jacksonville Shipyards, Inc.  
P. O. Box 2347  
Jacksonville, Florida 32203

Expiration Date: September 30, 1983

**SPECIFIC CONDITIONS:**

1. Maximum particulate matter emissions shall be:

Source	Emission Limitation	Maximum Emission Rate (lb/hr)
Filter system #1	0.03 gr/dscf	1.93
Filter system #2	0.03 gr/dscf	1.93

2. Visible emissions shall be less than five percent opacity.  
3. Maximum silo loading rate shall be 40 tons per hour of grit.  
4. Compliance with the emission limitations shall be determined by mass particulate matter sampling using DER method 5 for the transfer facilities. Visible emissions tests, using DER method 9 testing, shall be conducted concurrently with the mass particulate sampling.  
5. Compliance with the materials input limitations shall be determined by record keeping of the daily hours of operation and the daily amount of grit transfer. An annual operating report shall be submitted to the Jacksonville Bio-Environmental Services Division. This report shall contain daily operating hours and daily transfer of grit.  
6. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to the Jacksonville Bio-Environmental Services Division. Full operation of the source may then be conducted in compliance with the terms of this permit until expiration or receipt of an operating permit.

Issued this \_\_\_\_ day of \_\_\_\_, 19\_\_

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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\_\_\_\_ Pages attached.



# JACKSONVILLE SHIPYARDS, INC.

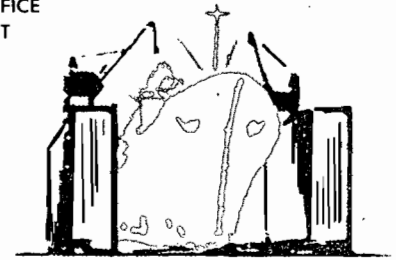
SUBSIDIARY OF FRUEHAUF CORPORATION

P. O. BOX 2347

JACKSONVILLE, FLORIDA 32203

NEW YORK OFFICE  
21 WEST STREET  
212-943-2397

CABLE ADDRESS-JAXSHIPPING  
TELEX 5-6284



(904)355-1711

December 28, 1982

State of Florida  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

Attention: C. H. Fancy, P.E.  
Deputy Bureau Chief  
Bureau of Air Quality Management

Subject: Permit No. A016-40678

Dear Mr. Fancy,

This is in reply to the questions in your letter of August 17, 1982.

1. Enclosed our check dated August 25, 1982, for \$80.00 in supplement to the check of \$20.00 sent with our application on July 26, 1982.
2. The attached diagrammatic "4 copies", "Grit Handling & Storage Facility - Air & Material Flow Diagram" answers your question 2-a,b,c.

Should additional information be required please call me at (904) 355-1711, ext. 225.

Sincerely,

Richard G. Seitz  
Vice President Engineering

RGS/ajp  
Enclosure

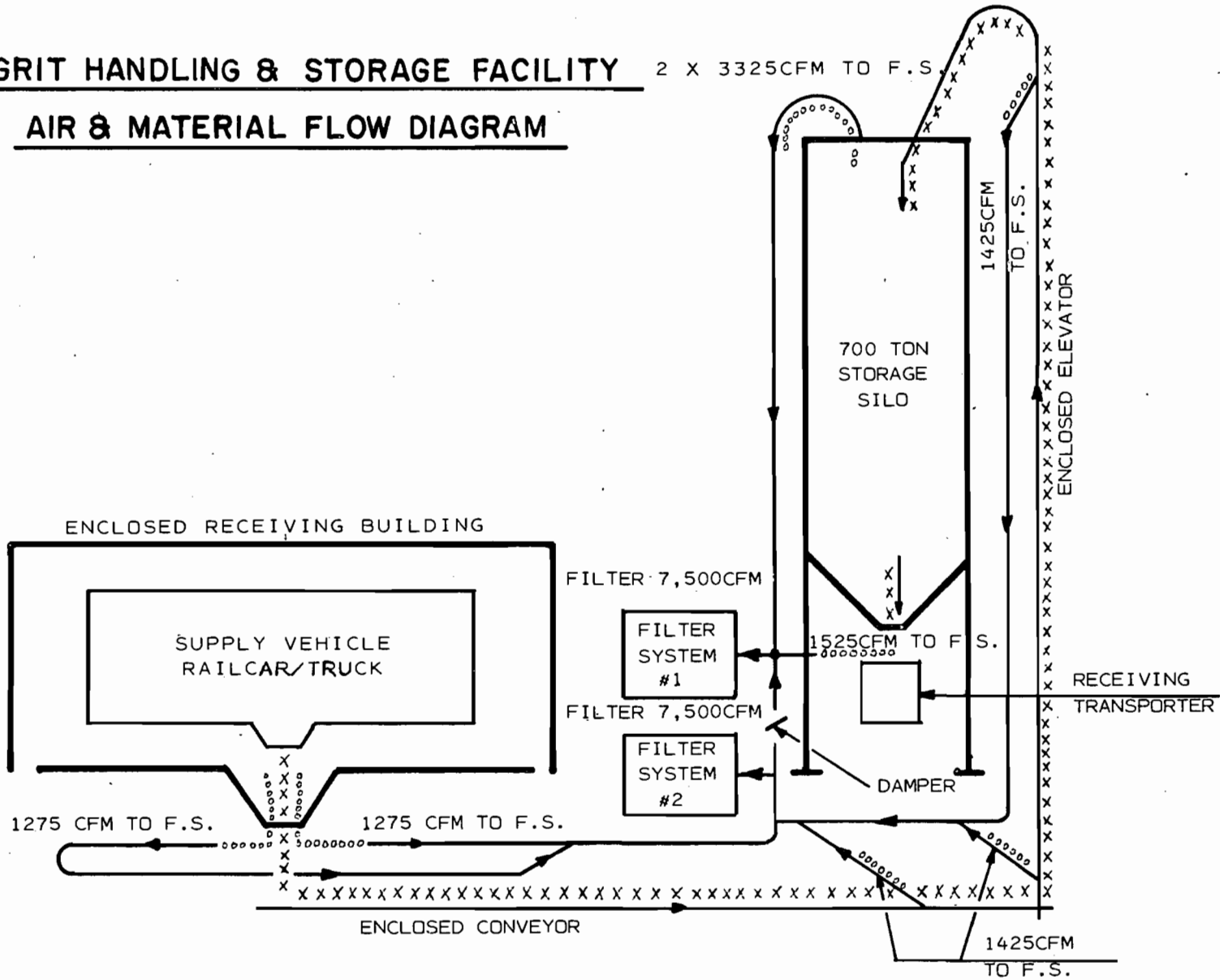
cc: D. Farley  
M. Smith

DER  
JAN 4 1983  
BAQM

# GRIT HANDLING & STORAGE FACILITY

2 X 3325CFM TO F.S.

## AIR & MATERIAL FLOW DIAGRAM



GRIT FLOW  $\xrightarrow{\text{XXXXXXXXXXXX}}$   
 AIR FLOW  $\xrightarrow{\text{oooooooooooo}}$   
 TO FILTER SYSTEM

FILLING RECEIVING TRANSPORTER  
 USE FILTER NO. 1 (CLOSE DAMPER)  
 FILLING SILO FR. RAILCAR USE  
 BOTH FILTER #1 & # 2 (OPEN  
 DAMPER)

DER

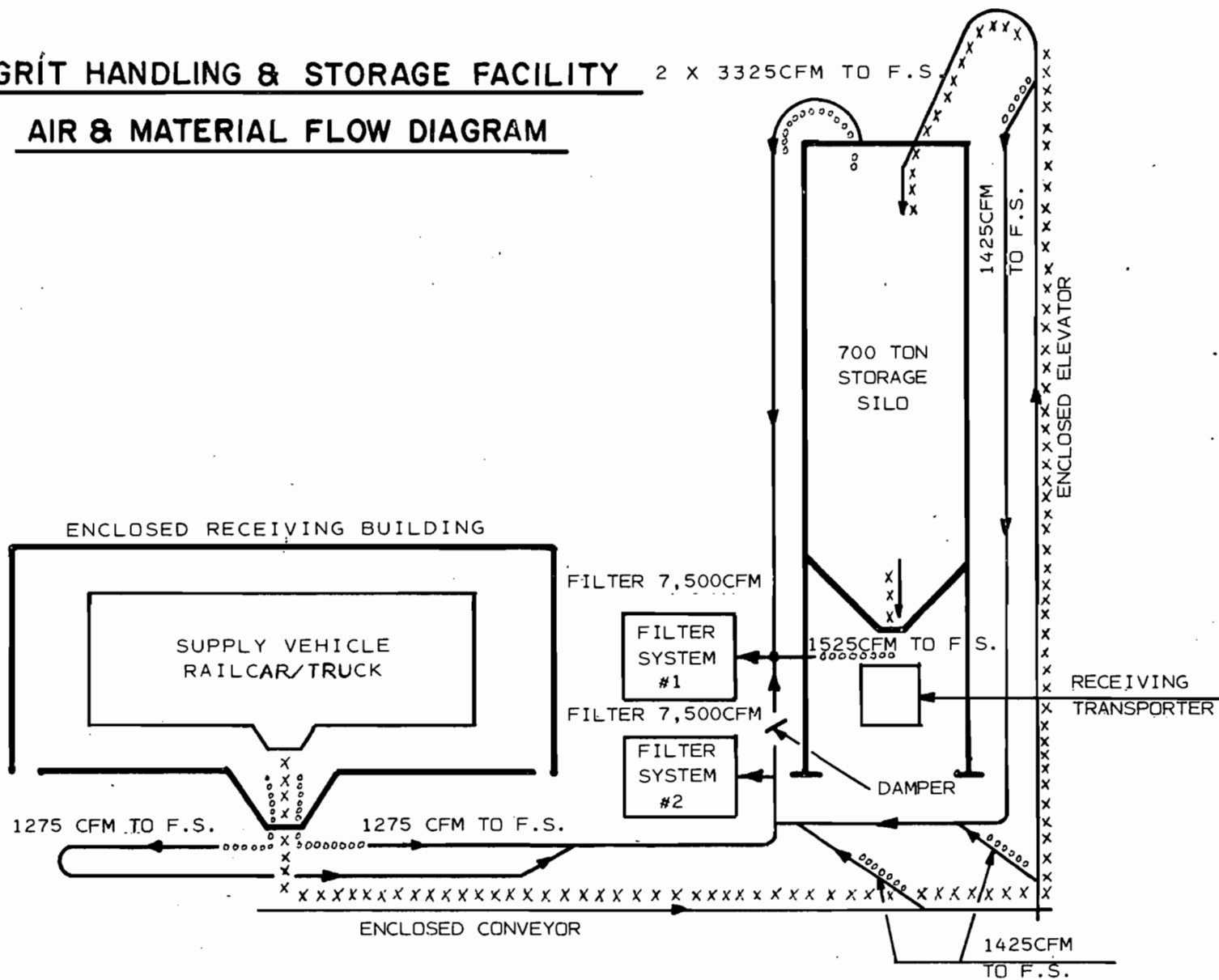
JAN 4 1983

BAQM

# GRIT HANDLING & STORAGE FACILITY

2 X 3325CFM TO F.S.

## AIR & MATERIAL FLOW DIAGRAM



GRIT FLOW  $\xrightarrow{\text{XXXXXXXXXX}}$   
 AIR FLOW  $\xrightarrow{\text{oooooooooooo}}$   
 TO FILTER SYSTEM

FILLING RECEIVING TRANSPORTER  
 USE FILTER NO. 1 (CLOSE DAMPER)  
 FILLING SILO FR. RAILCAR USE  
 BOTH FILTER #1 & #2 (OPEN  
 DAMPER)

DER

JAN 4 1983

BAQM

PS Form 3811, Jan. 1978

**SENDER:** Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

- Show to whom and date delivered.....
- Show to whom, date and address of delivery.....
- RESTRICTED DELIVERY  
Show to whom and date delivered.....
- RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery. \$ \_\_\_\_\_

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
J. J. Sugrue  
P. O. Box 2347  
Jacksonville, FL 32203

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	7682416	

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE  Addressee  Authorized agent

*Alma Clark*

4. DATE OF DELIVERY  
AUG 19 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

★GPO : 1979-300-459

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



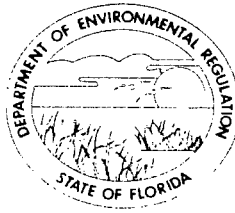
P16 7682416  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

PS Form 3800, Apr. 1976

SENT TO		J. J. Sugrue
STREET AND NO.		P. O. Box 2347
P.O., STATE AND ZIP CODE		Jacksonville, FL 32203
POSTAGE		\$ _____
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	_____ c
	SPECIAL DELIVERY	_____ c
	RESTRICTED DELIVERY	_____ c
	OPTIONAL SERVICES	
	RETURN RECEIPT SERVICE	
	SHOW TO WHOM AND DATE DELIVERED	_____ c
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	_____ c
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	_____ c
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	_____ c
TOTAL POSTAGE AND FEES		\$ _____
POSTMARK OR DATE		8/17/82

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

August 17, 1982

Mr. J. J. Sugrue  
Executive Vice President  
Post Office Box 2347  
Jacksonville, Florida 32203

Dear Mr. Sugrue:

Your air construction permit application for a grit storage facility has been transferred to this office for processing in accordance with the Department's division of responsibilities for major facilities. The application has been reviewed and has been found to be incomplete. Processing of the permit application will continue when the items listed below are received.

1. Effective July 8, 1982, the permit fee requirements contained in 17-4.05(4)(a), FAC changed. According to Subsection 5 of the above reference cite, the permit fee for construction of each source having potential emissions of less than 25 tons per year of any single pollutant is \$100.00. Therefore, a check for the difference must be received before processing can continue.
2. The application indicates that two De Vansco venturi particulate scrubbers, rated at 7500 afcm each, will be used. The air and material flow diagram indicates the system being vented into a 15,000 cfm collector. The following



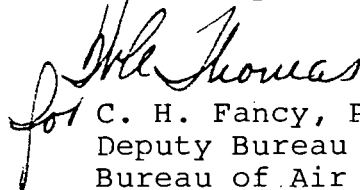
Mr. J. J. Sugrue  
August 17, 1982  
Page Two

additional information is required for the collection system.

- a. A flow diagram indicating which pick-up points are being ducted to which scrubber.
- b. The air flow from each pick-up point vent system to each scrubber.
- c. Indicate if the scrubbers will operate independently or in combination with each other.

When the above items are received processing of the permit applications will continue. If there are any questions concerning this matter, please contact John Svec of my staff at (904) 488-1344.

Sincerely,

  
for C. H. Fancy, P.E.  
Deputy Bureau Chief  
Bureau of Air Quality  
Management

CHF:JS:ras

cc: Robert Sholtes  
Steve Pace  
Doug Dutton

DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES  
Bio-Environmental Services Division  
Air and Water Pollution Control

August 12, 1982



Mr. Clair Fancy, P.E.  
Manager - CAP  
Bureau of Air Quality Management  
Dept. of Environmental Regulation  
Twin Towers Office Building  
2600 Blainstone Road  
Tallahassee, Florida 32301-8241

AUG 12 1982

BA

Re: Jacksonville Shipyards, Inc. (JSI)

Dear Mr. Fancy:

The Jacksonville Shipyards, Inc. (JSI) apparently intends to replace one of their drydocks with a new and larger drydock by mid 1983. The Bio-Environmental Services Division (BESD) advised JSI that if the new drydock would result in an increase in actual emissions, a DER Construction Permit Application would be necessary. JSI subsequently responded that no increase in grit purchase (hence utilization) was foreseen. If indeed no additional grit is utilized, then the addition of the drydock will not require a DER permit. However, BESD poses the following question to DER, "In order for the drydock not to represent a modification, is it necessary to establish, and henceforth limit the grit material utilized by JSI?".

YES

It would seem that failure to limit grit utilization would lead to the possibility that at some future point, the new drydock would represent a "modification" (a physical change that resulted in an increase in actual emissions). The current permit does not address grit utilization, hence it would necessitate a revision of the permit in order to limit grit utilization.

Enclosed for your reference is the previous correspondence between JSI and BESD on this specific subject.

DER's early response would be greatly appreciated.

Very truly yours,

Robert S. Pace, P.E.  
Air Pollution Engineer

RSP/vj  
Enclosure

cc: Mr. Doug Chunn -JSI Attorney  
cc: Mr. Doug Dutton - DER with enclosure  
cc: Mr. Madison Smith -JSI  
cc: Ms. Martha Harrell Hall - DER with enclosure



COMMANDER LEGLER WERBER DAWES & SADLER

PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

2000 INDEPENDENT SQUARE

JACKSONVILLE, FLORIDA 32202-5055

STEVEN A. WERBER  
CHARLES E. COMMANDER III  
MITCHELL W. LEGLER  
MICHAEL F. DAWES  
LUTHER F. SADLER, JR.  
KENNETH N. FINK  
DOUGLAS D. CHUNN  
JOHN M. WELCH, JR.  
E. ROBERT MEEK  
ROBERT A. HEEKIN  
DAVID H. PEEK  
CHARLES V. HEDRICK  
LINDA Y. KELSO  
FREDERICK M. WILLIAMS  
NANCY T. BOWEN

July 29, 1982

TELEPHONE:  
(904) 359-2000

TELEX:  
56-320 COMLAW JAX



Robert S. Pace, P.E.  
Air Pollution Engineer  
Department of Health, Welfare and  
Bio-Environmental Services  
Bio-Environmental Services Division  
515 W. 6th Street  
Jacksonville, Florida 32202

Dear Mr. Pace:

Our client, Jacksonville Shipyards, Inc., has requested that we respond to your letter of July 20, 1982.

Our client is of the opinion that the structural change does not represent a change in any potential pollution sources.

As you are no doubt aware, the State has not permitted any drydock as a pollution source. Of course, Jacksonville Shipyards was issued a permit in May of 1981 which specifically refers to abrasive blasting at the facility as a whole.

While the drydock which you describe will give our client some additional flexibility as to the positioning of various ships during repair, it is expected that the shipyard will receive the same mixture of ships in the future as it has repaired in the past. Due to these and various other considerations, we do not foresee the need for additional grit being purchased.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

*Douglas D. Chunn*

Douglas D. Chunn

DDC/wba

DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES  
Bio-Environmental Services Division  
Air and Water Pollution Control

July 20, 1982



Mr. John J. Sugrue  
Executive Vice President  
Jacksonville Shipyards Incorporated  
P.O. Box 2347  
Jacksonville, Florida 32203

Dear Mr. Sugrue:

It has come to the attention of the Bio-Environmental Services Division (BESD) that Jacksonville Shipyards Inc. (JSI) has modified their facility by returning one of their three drydocks to the Navy. It is further understood that JSI is seeking a \$30 million bond in order to buy a newer and larger drydock to replace the one returned to the Navy.

If indeed it is true that JSI intends to replace the returned drydock with a larger drydock, a permit to modify the JSI facility may be required pursuant to Section 17-2.210(1)FAC - "Permits Required". The referenced section of 17-2 FAC states "an air pollution Construction Permit shall be obtained by the owner or operator of any new or modified source prior to beginning construction in accordance with Chapter 17-2 Part V, and 17-4 FAC". Since the new drydock may represent a modification as defined by Section 17-2.100(102), "any physical change in or change in the method of operation of or addition to a stationary facility which increases the actual emissions of any pollutant regulated under this Chapter...", a permit to accomplish such needs to be addressed. (2)

Further, if a permit is required to modify the facility, i.e., add the new drydock, JSI needs to address whether or not the emissions will increase over the level designated in Chapter 17-2, as "Significant Net Emissions Increase". It would appear that under Section 17-2.510(2)(d)4 FAC "Modifications to Major Facilities", JSI must establish whether the emissions from the new drydock will or will not exceed a significant net emission rate of 25 tons per year. If the emissions from the new drydock are equal to or greater than the 25 tons per year, such a modification (the proposed new drydock) would be subject to Section 17-2.510(4) FAC - "Preconstruction Review Requirements". The preconstruction review would require the incorporation of LAER, Statewide compliance, New Source Allowance/Emission Offsets and Net Air Quality Improvement prior to DER approving a permit for such a modification.

The most significant aspect of being subject to the "Preconstruction Review Requirements", would be that, pursuant to Section 17-2.640 FAC, an application to the Florida DER for determination of a Lowest Achievable Emission Rate, would be required.



Naturally, should JSI be able to document that emissions will not increase, no further action would be required for the proposed new drydock. If such data exists, please forward a copy to this Agency for review, on or before August 20, 1982.

Otherwise, the above information regarding permitting of the proposed new drydock is forwarded to assist JSI in such an endeavor. Naturally, if a permit is required, it would be to JSI's benefit to initiate the process as soon as practical to insure that a permit can be obtained prior to installation of the drydock.

JSI's and your cooperation in this matter will be appreciated. If there are any questions on this issue, please contact this Office at your convenience.

Very truly yours,

Robert S. Pace, P.E.  
Air Pollution Engineer

RSP/vj

cc: Mr. Doug Dutton - DER  
cc: Mr. Steve Smallwood, P.E. - DER Tallahassee

# JACKSONVILLE SHIPYARDS, INC.

No. 907318

THE ATLANTIC NATIONAL BANK  
OF JACKSONVILLE  
JACKSONVILLE, FLORIDA

SUBSIDIARY OF FRUEHAUF CORPORATION  
P. O. BOX 2347  
JACKSONVILLE, FLORIDA 32203

63-2  
630

PAY TO THE ORDER OF \$20.00

DATE: July 27, 1982 AMOUNT: \$20.00

TO THE ORDER OF

DEPARTMENT OF ENVIRONMENTAL REGULATION

JACKSONVILLE SHIPYARDS, INC.  
ACCTS. PAYABLE DISB. A/C

BY: *[Signature]*



*[Handwritten mark]*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 33622

### RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Jacksonville Shipyards, Inc Date August 13, 1982

Address P.O. Box 2347, Jacksonville, FL 32203 Dollars \$ 20.00

Applicant Name & Address Same as above

Source of Revenue \_\_\_\_\_

Revenue Code 0101 Application Number AC 11-49684

By Patricia G. Adams

DEPARTMENT OF HEALTH, WELFARE  
& BIO-ENVIRONMENTAL SERVICES  
Bio-Environmental Services Division  
Air and Water Pollution Control



July 28, 1982

DER  
JUL 30 1982  
BAQM

Mr. Clair Fancy, Manager  
Central Air Permitting Section  
Dept. of Environmental Regulation  
2600 Blainstone Road  
Tallahassee, Florida 32301

Re: Jacksonville Shipyards, Inc.

Dear Mr. Fancy:

Enclosed is a Modification Permit application and processing fee (check #907318) for the Jacksonville Shipyards, Inc. grit storage facility. This application is being forwarded to your office for processing pursuant to the guidelines available to this Agency. Bio-Environmental Services Division offers the following comments:

- (1) The enclosed permit application is required pursuant to Permit A016-40678 (copy enclosed).
- (2) The silo is an existing source without control equipment and is located in a non-attainment area.
- (3) The fee submitted does not comply with DER's recently approved (July 8, 1982) fee schedule.

If I can be of further assistance in this matter, please advise.

Very truly yours,

Jerry E. Woosley  
Assistant Air Engineer

JEW/vj  
Enclosures

cc: Mr. Doug Dutton - DER  
cc: Mr. Richard Seitz - JSI  
cc: Dr. Robert Sholtes - Sholtes & Koogler



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

ST. JOHNS RIVER  
SUBDISTRICT

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

G. DOUG DUTTON  
SUBDISTRICT MANAGER

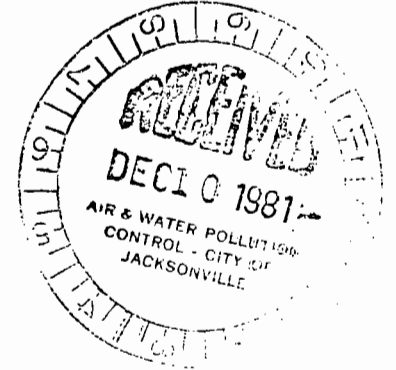
DER Copy

JUL 30 1982

December 10, 1981

BAQM

Mr. Richard G. Seitz  
Vice President - Engineering  
~~Jacksonville Shipyards, Inc.~~  
P. O. Box 2347  
Jacksonville, Florida 32203



Re: Permit A016-40678

Dear Mr. Seitz:

The Bio-Environmental Services Division has reviewed and recommended approval of the modification of the subject permit such as to include a schedule for construction of a new grit blast storage facility and the Department of Environmental Regulation has subsequently approved such a modification. Specifically, the grit blast storage facility shall be constructed according to the following table which now becomes a condition of Permit A016-40678:

Complete engineering (except for foundation details)	January 8, 1982
Submit Construction Permit application to Department of Health, Welfare & Bio-Environmental Services	January 11, 1982
Complete engineering for foundation	February 5, 1982
Submit Construction Permit application to City of Jacksonville	February 12, 1982
Complete foundation construction	May 7, 1982
Complete silo construction	July 5, 1982
Complete installation of mechanical, dust emission control and electrical system	August 30, 1982
Complete grading, road and railroad construction drainage and surfacing	October 11, 1982
Operational Facility	October 11, 1982

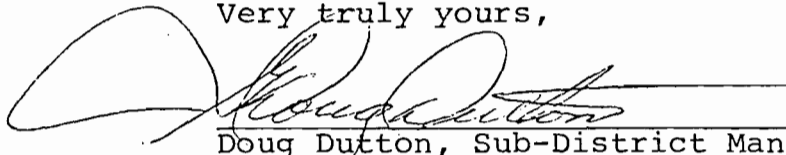


Mr. Richard G. Seitz  
Vice President - Engineering  
Jacksonville Shipyards, Inc.

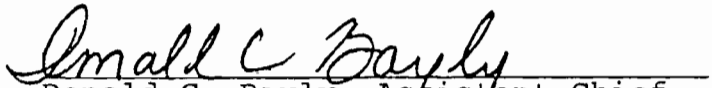
Permit A016-40678

Should Jacksonville Shipyards, Incorporated have any questions or comments regarding this matter, contact the Bio-Environmental Services Division.

Very truly yours,



Doug Dutton, Sub-District Manager  
Department of Environmental Regulation



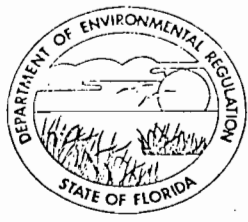
Donald C. Bayly, Assistant Chief  
Bio-Environmental Services Division

RSP/am

cc: Bio-Environmental Services Division

BES

3426 BILLS ROAD  
JACKSONVILLE, FLORIDA 32207



BOB GRAHAM  
GOVERNOR

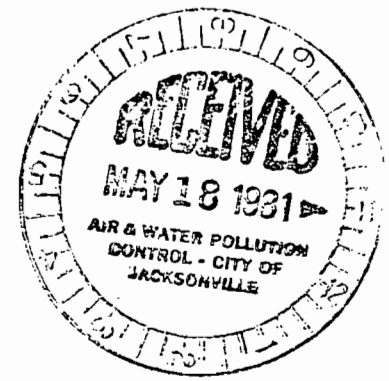
JACOB D. VARN  
SECRETARY

G. DOUG DUTTON  
SUBDISTRICT MANAGER

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**  
ST. JOHNS RIVER SUBDISTRICT

May 14, 1981

Mr. J. J. Sugrue  
Executive Vice President  
Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, Florida 32203



Dear Mr. Sugrue:

Duval County - AP  
Jacksonville Shipyards, Inc.  
Grit Blasting of Seagoing Vessels

Enclosed is Permit Number A016-40678, dated May 14, 1981, to operate the subject pollution source, issued pursuant to Section 403.061(14), Florida Statutes.

Should you object to this permit, including any and all of the conditions contained therein, you may file an appropriate petition for administrative hearing. This petition must be filed within fourteen (14) days of the receipt of this letter. Further, the petition must conform to the requirements of Section 28-5.201, Florida Administrative Code (see reverse side). The petition must be filed with the Office of General Counsel, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301.

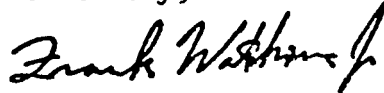
If no petition is filed within the prescribed time, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this matter.

The Jacksonville office of the Department concurs with the content of the letter from Walter W. Honour to Mr. Douglas D. Chunn, attorney, dated May 8, 1981. Copy of said letter is attached.

Mr. J. J. Sugrue  
May 14, 1981  
Page two

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement action for violation of the conditions and requirements thereof.

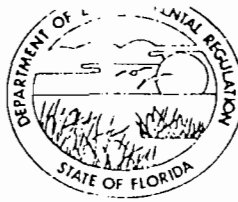
Sincerely,



Frank Watkins, Jr., P.E.  
Subdistrict Engineer

① FW:jjk

cc: Records Center, Tallahassee  
Robert S. Sholtes, Ph.D., P.E.  
Bio-Environmental Services Division



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

ST. JOHNS RIVER SUBDISTRICT

APPLICANT:

Jacksonville Shipyards, Inc.  
Post Office Box 2347  
Jacksonville, FL 32203

PERMIT/CERTIFICATION  
NO. A016-40678

COUNTY: Duval

PROJECT: Grit Blasting of  
Seagoing Vessels

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

For the Operation of A Facility Involved in the Repair and Overhaul and Painting of Seagoing Vessels. Surface Preparation of the Vessels Involves Selective Grit Blasting Where Rusting or Corroding Sections of the Ship Are Cleaned Down to Bare Metal.

Located at East Bay Street, Jacksonville, Duval County, FL  
UTM: E-438500 N-3,354,500

In accordance with the application dated March 9, 1981.

PERMIT NO.: A016-40678  
APPLICANT: Jacksonville Shipyards, Inc.

SPECIFIC CONDITIONS:

1. Supporting documents are retained in file of office to which they were submitted and not attached as stated in the leading paragraph and General Condition No. 2. They are as follows: application, descriptive narrative, location diagram.
2. Testing of emissions must be accomplished at  $\pm 10\%$  of the rate stated in the permit.
3. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
4. Any revision(s) to a permit (and application) must be submitted and approved prior to implementation.
5. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>Emission Rate</u>	<u>Maximum Allowable Emissions</u>
Total Suspended Particulate	Fugitive Particulate <u>17-2.05(3)</u>	No emissions without taking reasonable precautions

6 Pursuant to item #5 above, the following work practice shall constitute reasonable precautions for Jacksonville Shipyards, Inc. grit blasting and related activities:

- a). Wet blast, or black beauty in a wet slurry constituency, will be used whenever operationally possible.
- b). Main grit blast storage silo shall be equipped and maintained with a bag filter control device, through which all displaced air and entrained particulate shall be ducted. This installation shall be completed by January 1, 1982, and shall be permitted separately. A construction permit shall be applied for by July 1, 1981.
- c). All JSI grit transport containers shall be redesigned or maintained to eliminate spillage during on and off loading. Any redesign shall be completed and in operation by July 1, 1981.
- d). Beginning on June 1, 1981, all grit removed from the storage silo shall be transported entirely within the confines of Jacksonville Shipyards, Inc. property, except for that utilized at other locations or that sold to third-party purchasers.
- e). A regular sweeping program shall be instituted and maintained for all intra-yard transport routes. One employee shall be assigned the duty of operating a sweeper for 8 hours per day during each work week. The foregoing employee's time card shall be available for inspection by authorized pollution control agency personnel.

PERMIT NO.: A016-40678 Grit Blasting  
APPLICANT: Jacksonville Shipyards, Inc.

f). All blasting of miscellaneous components not fixed to a ship or barge and of a size compatible with the abrasive blast facility, and where operationally and economically feasible, shall be carried out in said abrasive blast facility, constructed for this purpose, pursuant to construction permit AC16-18726.

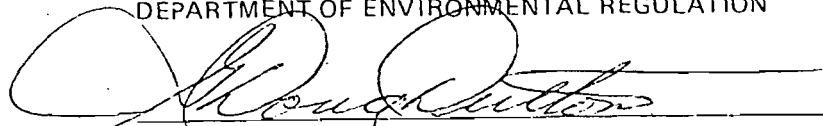
- ✓ 7. Jacksonville Shipyards, Inc. shall continue to investigate all reasonable techniques and proposals for the control of emissions from outdoor grit blasting on ships, and will implement control for such operations upon their demonstrated technological, operational, and economic feasibility and effectiveness in substantially reducing said emissions. Toward this end, JSI will submit to the Department an annual report of its investigations. The report, submitted on the anniversary date of this permit, shall specify control methods investigated during the past year, location of said operations, appraisal of usefulness and applicability of the method, and any known instances of actual use of said method by shipyards.
- ✓ 8. Jacksonville Shipyards, Inc. shall submit quarterly blasting reports to the Bio-Environmental Services Division and to the Department, no later than the 20th of the month following the end of the quarter. The reports shall contain the type and amount of blasting material used.

Expiration Date: May 15, 1984

Issued this 14th day of May, 1981

                     Pages Attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION



G. Doug Dutton, Signature Subdistrict Manager

PAGE 4 OF 4

AC 10-58684



DER

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

JUL 30 1982

BAQM

SOURCE TYPE: Grit Storage Facility  New<sup>1</sup>  Existing<sup>1</sup>

APPLICATION TYPE:  Construction  Operation  Modification

COMPANY NAME: Jacksonville Shipyards, Inc. COUNTY: Duval

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Grit Storage Facility

SOURCE LOCATION: Street Shop Road City Jacksonville

UTM: East 437990 North 3354411 (Zone 17)

Latitude 30 ° 19 ' 20 " N Longitude 81 ° 38 ' 30.1 " W

APPLICANT NAME AND TITLE: Mr. J. J. Sugrue, Executive Vice President

APPLICANT ADDRESS: Post Office Box 2347, Jacksonville, Florida 32203

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Jacksonville Shipyards, Inc.

I certify that the statements made in this application for a Modification

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 permitted establishment.

\*Attach letter of authorization

Signed: [Signature]

J. J. Sugrue, Executive Vice President

Name and Title (Please Type)

Date: 7-23-82 Telephone No. 904/355-1711

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 the permit application. There is reasonable assurance, in my professional judgment, that 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: [Signature]

Robert S. Sholtes, Ph.D., P.E.

Name (Please Type)

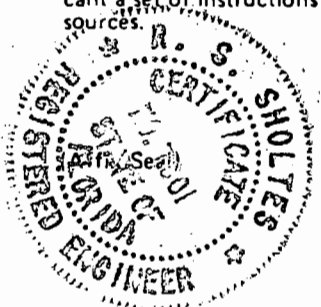
Sholtes & Koogler, Environmental Consultants

Company Name (Please Type)

1213 N.W. 6th Street, Gainesville, FL 32601

Mailing Address (Please Type)

Date: July 23, 1982 Telephone No. (904) 377-5822



Florida Registration No. 7601

<sup>1</sup>See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

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. Eliminate potential source of fugitive dust emission during transfer of grit  
material from railroad car (or truck) to main storage silo and from silo to trans-  
port containers by equipping and maintaining facility with venturi wet scrubber  
control device through which all displaced air and entrained particulate will be  
ducted.
- B. Schedule of project covered in this application (Construction Permit Application Only)  
Start of Construction August, 1982 Completion of Construction October, 1982
- 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.)  
Venturi wet scrubber control device, air ducting system and rail car/truck  
discharge building - total cost estimate \$165,000.00
- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.  
Permit number A016-40678, dated May 14, 1981. Per approval for construction/  
modification of storage facility made a permit condition on December 10, 1981.
- E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code?  Yes  No
- F. Normal equipment operating time: hrs/day \_\_\_\_\_ ; days/wk \_\_\_\_\_ ; wks/yr \_\_\_\_\_ ; if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: Operating time depends upon requirement for grit and fluctuates  
daily.
- G. If this is a new source or major modification, answer the following questions. (Yes or 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) requirements 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? \_\_\_\_\_
- Attach all supportive information related to any answer of "Yes". Attach any justification 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		
See application dated March 9, 1981 for which Permit No. A016-40678 was issued.				

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

1. Total Process Input Rate (lbs/hr): Loading to storage approx. 80,000 lbs. per hour

2. Product Weight (lbs/hr): \_\_\_\_\_

C. Airborne Contaminants Emitted: Limited by CH.17-2.650; Ract Regulation

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission <sup>2</sup> Rate per Ch. 17-2, F.A.C.	Allowable <sup>3</sup> Emission lbs/hr	Potential Emission <sup>4</sup>		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Dust	To be determined		0.03 GR/SCH	3.86	12	2.7	

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles <sup>5</sup> Size Collected (in microns)	Basis for Efficiency, (Sec. V, It <sup>5</sup> )
DeVansco Venturi Particulate Scrubber 2 @ 7500 CFM	Dust	See efficiency curves which are the official manufacturers performance data provided to our Key Houston Division as part of the Engineering documentation required by Key license to manufacturer.		

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3)

<sup>5</sup>If Applicable

E. Fuels

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

\*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, 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. Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.  
Sludge; disposed of in an approved dumping area

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

Stack Height: Approx. 20 ft. Stack Diameter: Rectangular 24" x 27" ft.  
 Gas Flow Rate: 2 @ 7500 ACFM Gas Exit Temperature: Ambient °F.  
 Water Vapor Content: 100% Rel. Hum. % Velocity: About 28 FPS

**SECTION IV: INCINERATOR INFORMATION**

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste \_\_\_\_\_  
 Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_  
 Approximate Number of Hours of Operation per day \_\_\_\_\_ days/week \_\_\_\_\_  
 Manufacturer \_\_\_\_\_  
 Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	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: \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

- Total process input rate and product weight — show derivation.
- 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.
- Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
- 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, etc.).
- 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).
- An 8½" 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.
- An 8½" 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).
- An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SECTION III.C. AIRBORNE CONTAMINANTS EMITTED.

Railroad discharge location	2550	CFM
Belt conveyor discharge	1425	CFM
Bucket elevator foot	1425	CFM
Bucket elevator head	1425	CFM
Top of silo (2 x 3325 CFM)	6650	CFM
Base of silo (loading station)	<u>1525</u>	<u>CFM</u>
TOTAL AIR DISCHARGE	15,000	CFM

So, allowable emission

$$= \frac{15,000 \times 60 \times 0.03}{7000} = 3.86 \text{ lbs/hr}$$

Potential emission if source operated without control

Following based on information obtained from U.S. Environment Protection Agency Publication EPA-450/3-77-010 of March 1977, "Technical Guidance for Control of Industrial Process Fugitive Particulate Emissions."

Refer to Table 2-1 and note sand might have an uncontrolled emission factor of about 0.3 lb. per ton. Table 2-4 shows coal at 0.4 lb. per ton. Since blasting grit has characteristics more like sand and probably is cleaner than coal, use the factor given for sand. Then, the uncontrolled potential emission, at the designed rate of 40 tons per hour, is  $40 \times 0.30 = 12$  lbs. per hour. Since yearly consumption varies, it is difficult to estimate the potential emission; however, assume the 1981 use of 17939 tons as being about average.

Then yearly potential is:

$$18,000 \text{ ton} \times 0.3 \text{ lb. per ton} = 5,400 \text{ lb} = 2.7 \text{ tons}$$

Copy of portions of EPA reference attached.

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KOXYLZIC

EPA-450/3-77-010

March 1977

**TECHNICAL GUIDANCE  
FOR CONTROL OF  
INDUSTRIAL PROCESS  
FUGITIVE PARTICULATE  
EMISSIONS**



**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
Office of Air and Waste Management  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

## 2.1 COMMON DUST SOURCES

Some industrial process fugitive emission sources occur at many plants. Rather than repeating descriptions of these sources for each industry, they are described in general terms in this section. The industrial process emission sources described here include transfer and conveying and loading and unloading. Only the unusual aspects of these common sources will be discussed in the sections on fugitive emissions from specific industries.

Also, there are several potential sources of fugitive dust within plant boundaries that are not directly associated with process operations. However, these sources are considered to be IPFPE because they occur on plant property. They should be included in an emission inventory or air quality analysis of the plant since they are often of the same order of magnitude as the fugitive process emissions. The fugitive dust sources described here include roads, storage piles, and waste disposal sites.

### 2.1.1 Transfer and Conveying

Description - Material transfer and conveying operations are common to nearly all processing industries. Equipment includes belt conveyors, screw conveyors, bucket elevators, vibrating conveyors, and pneumatic conveyors. The type of conveying equipment varies with the application, determined primarily by the quantity and characteristics (size, specific gravity, moisture content, etc.) of the material being handled, the transfer distance and elevation, and conditions of the working environment.

Generally, conveyor runs between processes are less than 300 meters (1000 ft). However, belt conveyors used for overland transfer, such as for moving coal from a preparation plant at a captive mine site to a power plant, may be over 20 kilometers (12 miles) long.

Loss of material from conveyors is primarily at the feeding, transfer, and discharge points and occurs due to spillage or windage. The majority of particulate emissions are generally from spillage and mechanical agitation of the material at transfer points. However, emissions from inadequately enclosed systems can be quite extensive.

Wetting can provide good control in many instances. However excessive moisture in the material or air currents can create discharge problems, especially on belt conveyors. Wet material being conveyed may cling to the belt and fall from the return strand. Therefore, many conveyor systems are enclosed, both for maintenance of product quality and air pollution control.

Emission Rates - Transfer/conveying is one of the most variable process operations with respect to fugitive particulate emission rates. Emission rates vary with the type of conveyor system being used, the material being transferred, the extent of coverage of the conveying system, and, for outside systems, local meteorological conditions.

The emission rate data available for transfer and conveying operations are presented in Table 2-1. Emission rates for other materials can be roughly estimated by comparative engineering judgment with these rates.

Table 2-1. TRANSFER AND CONVEYING EMISSION FACTORS

Material transferred	Uncontrolled emission factor per unit of material transferred	Reliability factor
Coal	0.02-0.48 kg/Mg <sup>a,b,c</sup> (0.04-0.96 lb/ton)	E ✓
Coke	0.012-0.065 kg/Mg <sup>c,d</sup> (0.023-0.13 lb/ton)	E ✓
Dry phosphate rock	0.75 kg/Mg <sup>e</sup> (1.5 lb/ton)	D -
Sand	0.15 kg/Mg <sup>b</sup> (0.3 lb/ton)	E ✓
Grain	1.0-2.0 kg/Mg <sup>f</sup> (2.0-4.0 lb/ton)	E ✓
Iron ore	1.0 kg/Mg <sup>g</sup> (2.0 lb/ton)	E ?
Lead ore	0.82-2.5 kg/Mg <sup>h</sup> (1.64-5.0 lb/ton)	E ?

<sup>a</sup> Reference 1.

<sup>b</sup> Reference 2.

<sup>c</sup> Reference 3.

<sup>d</sup> Reference 4.

<sup>e</sup> Reference 5. Includes conveying and loading onto railroad cars.

<sup>f</sup> Reference 6.

<sup>g</sup> Reference 7.

<sup>h</sup> Reference 8.

Inventory Techniques - The annual operating parameter or throughput for the material being handled should be determined. Application of the appropriate emission factor and control efficiency to this annual throughput yields the annual emission rate.

Characterization of Fugitive Emissions - Like most IPFPE sources, emissions from transfer and conveying have the same chemical characteristics as the materials being



processed (conveyed). The size of emissions is generally less than 100  $\mu\text{m}$  diameter, except for extremely light materials.

Control Technology - Possible control technology applications for transfer and conveying IPFPE sources are summarized in Table 2-2 and discussed in greater detail below.

Particulate emissions are either created mechanically, such as from the movement of belts or at transfer points, or by the force of the wind on unprotected conveyor sections. The mechanically generated emissions are more easily controlled than most fugitive emissions from windage.<sup>5</sup>

The mechanically generated dust is a function of material particle size and machinery speed. Generally, mechanically generated dust may be controlled by covering or hooding the area emitting the dust, application of a negative pressure to the hooded area with exhaust and subsequent collection by control equipment.

Enclosures also protect the conveyor systems and transfer points from windage losses. As delineated in Table 2-2, enclosures can either be complete (e.g., tunnels for belt conveyors) or partial. Table 2-3 summarizes the features of complete and partial enclosures.

The major operating problem with belts is the sticking of material to the belt after leaving the point of transfer. This problem is generally reduced by a blade or brush which scrapes the bottom of the underside of the belt. Other devices such as vibrators and air jets have been tried with very limited success, due to their expense and large number of operational and maintenance problems.<sup>9</sup> Moistening the underside of the belt has been shown to reduce emission levels at a chain feeder by 15 percent.<sup>10</sup>

Table 2-2. CONTROL TECHNOLOGY APPLICATIONS FOR  
TRANSFER AND CONVEYING SOURCES

Emission points	Control procedure
Conveyor System (belt, bucket elevator, etc.)	Enclosure <ul style="list-style-type: none"> <li>° top covered</li> <li>° sides and top covered</li> <li>° completely enclosed</li> </ul> Wet suppression (water, chemical, foam) at conveyor feed points. Belt scrapers and wipers Mechanical belt turnovers Replacement with pneumatic system or screw conveyor
Transfer and transition points	Enclosure Hoods, covers, or canopies with exhaust to removal equipment (fabric filters, and wet-collectors). Wet suppression (water, chemical foam).

Table 2-3. FEATURES OF CONVEYOR ENCLOSURES<sup>9</sup>

Features	Top covered	Sides protected	Completely enclosed
Easy to vent	x	x	xxxx
Easy to maintain	xxxx	xxx	xx
Accumulated dust may be easily removed	xxxx	xxx	xx
Eliminates dust	xx	xxx	xxxx ✓
Reduces noise	x	xxx	xxxx

Key: x Does not work  
 xx Marginal  
 xxx Good  
 xxxx Excellent

## REFERENCES FOR SECTION 2.1.1

1. Evaluation of Fugitive Dust from Mining, Task 1 Report. PEDCo-Environmental Specialists, Inc., Cincinnati, Ohio. Prepared for Industrial Environmental Research Laboratory/REHD, U.S. Environmental Protection Agency, Cincinnati, Ohio. Contract No. 68-02-1321, Task No. 36, June, 1976.
2. Personal Communication from G. McCutchen, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina, to Midwest Research Institute, Kansas City, Missouri. February 1976.
3. Transmittal from the American Iron and Steel Institute to Mr. Don Goodwin of the U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina. Data contained in table entitled Source Data for Steel Facility Factors. July 13, 1976.
4. Internal Memo, to George B. Crane from Reid Iversen, entitled Emission Factors for the Iron and Steel Industry. U.S. Environmental Protection Agency, Research Triangle Park, North Carolina. December 8, 1976.
5. Fugitive Dust from Mining Operations--Appendix, Final Report, Task No. 10. Monsanto Research Corporation, Dayton, Ohio. Prepared for U.S. Environmental Protection Agency, Research Triangle Park, North Carolina. May 1975.
6. Emissions Control in the Feed and Grain Industry, Volume 1. Engineering and Cost Study. Midwest Research Institute, Kansas City, Mo. Prepared for U.S. Environmental Protection Agency, Office of Air and Water Programs. EPA-450/3-73-003a. December 1973. p. 118.

7. Gutow, B.S., An Inventory of Iron Foundry Emissions. Modern Casting. January 1972.
8. Vandegrift, A.E. and L.J. Shannon. Handbook of Emissions, Effluents, and Control Practices for Stationary Particulate Pollution Sources. Midwest Research Institute. Prepared for U.S. Environmental Protection Agency. Contract No. CPA 22-69-104. November 1, 1970.
9. Cross, F.L. Jr. and Forehand, G.D. Air Pollution Emissions from Bulk Loading Facilities, Volume 6, Environmental Nomograph Series. Technomic Publishing Co., Inc., Westport, Connecticut, 1975. pp. 3-4.
10. Seibel, Richard J. Dust Control at a Transfer Point Using Foam and Water Sprays. U.S. Bureau of Mines, Washington, D.C. Technical Progress Report 97. May, 1976.
11. Cole, Howard J. Foam Suppressants in the Control of Source and Fugitive Emissions. Deter Company, Inc., East Hanover, N.J. February, 1976.
12. Evans, Robert J. Methods and Costs of Dust Control in Stone Crushing Operations. U.S. Bureau of Mines, Pittsburgh, Pa. Information Circular 8669. 1975.

### 2.1.2 Loading and Unloading

Description - Loading and unloading bulk material is common to many processing industries. It involves transfer of the material between interim storage facilities and trucks, ships, barges, or rail cars (hopper cars and box-cars). While loading and unloading operations can be either for external transportation of material to or from a facility or for internal transportation within a facility (for example, internal transportation might consist of loading of a mining haul truck with ore via a front-end loader for subsequent unloading to a crushing process), this discussion is restricted to operations for external transportation. Loading and unloading for internal transportation are more industry specific, and are therefore addressed separately in individual industry sections.

Fugitive emissions from these operations emanate primarily from the mechanical agitation of the material as it strikes the sides and bottom of the transportation vehicle and by the turbulence created by the air which is displaced as the material is moved into or out of the transportation vehicle. Windage losses are generally minor during loading and unloading; however, heavy winds can cause severe problems, especially when these operations are inadequately enclosed.

Delivery of the bulk material to the cargo holds of ships and interiors of trucks and rail cars is typically accomplished by belt conveying, gravity discharge from elevated storage, pneumatic systems, or clam-shell bucket cranes. On cargo vessels, a rapidly moving horizontal conveyor called a slinger throws the product at high velocities out to the far reaches of the hold which cannot be reached directly from the hatch opening. Fugitive emissions

from loading barges and ships can be quite significant and very difficult to control, due to the difficulty in effectively containing and exhausting the expansive openings in the holds of these vessels.

The same facility is often employed for both loading and unloading of trucks and rail cars. Such a facility normally consists of a drive-through shed affording some protection from precipitation and wind, but offering minimal enclosure for suppression of fugitive emissions. These drive-through sheds are sometimes equipped with a roll-down door on one end or shrouds at both ends (to prevent a wind tunnel effect), although more commonly they are unprotected at both ends to allow entrance and departure as quickly as possible. Air is usually blowing through this "tunnel" at speeds greater than the wind in open areas away from the enclosure, thereby aggravating the fugitive emission problem and making it more difficult to contain and capture the emissions.<sup>1</sup>

The quantity of dust emitted during barge and ship unloading is relatively small in comparison with railroad car and truck unloading. Unloading is normally accomplished by belt conveyors which are fed from hoppers in ship's holds, by means of retractable bucket type elevators that are lowered into the holds of barges and ships, or by clam-shell buckets which are most often open at the top and poorly sealed at the bottom.

Emission Rates - Emission rates vary with the moisture content of the material being loaded or unloaded, the type and configuration of the vehicle (truck, rail car, barge, and ship), the method of loading/unloading, wind speed, and efficiency of the control technique employed.

Emission rate data available from field tests and engineering judgement for loading and unloading operations are presented in Table 2-4.

Inventory Techniques - The annual throughput for the bulk material shipped or received should be determined. Application of the appropriate emission factor and control efficiency to this annual throughput yields the estimated annual emission rate.

Characterization of Fugitive Emissions - Emissions from bulk material loading and unloading have the same chemical characteristics as the materials being hauled. However, the size distributions of the emissions is somewhat independent of the material, since only the fines become airborne.

Control Technology - Various control technology applications for loading IPFPE are presented in Table 2-5. These techniques can be used alone or at times in various combinations. Generally, the simultaneous use of more than one technique will provide increased levels of control.

Rail car and truck loading - To minimize particulate emissions from rail car and truck loading, the entire operation can be enclosed by the use of doors on the loading shed. This prevents the wind tunnel effect and whatever dust is emitted remains in the enclosure where it can settle to the ground. By venting the entire enclosure to a control device, dust leakage around the doors and any other openings can be prevented thus ensuring near 100 percent control. The grain industry utilizes this technique widely.

Exhausting the car or truck body to a dust removal device reduces emissions if the body is fairly well enclosed. In open type rail or truck bodies this technique is not too effective.

Choke-feed eliminates free fall of material into the car or truck. In this technique the mouth of the feed tube

Table 2-4. EMISSION FACTORS FOR LOADING  
AND UNLOADING OPERATIONS

Material/Operation	Uncontrolled Emission Factor	Reliability factor
Dry phosphate rock products/loading or unloading - railcar and truck	0.75 kg/Mg <sup>a</sup> (1.5 lb/ton)	C -
Taconite pellets/ rail car unloading in drive-through shed	0.015 kg/Mg <sup>b</sup> (0.03 lb/ton)	E ?
Taconite/ship loading by belt conveyors	0.01 kg/Mg <sup>b</sup> (0.02 lb/ton)	E ?
Coal/hopper car unloading, or barge loading	0.2 kg/Mg <sup>c</sup> (0.4 lb/ton)	E ✓
Grain/loading or unloading rail - drive-through shed truck drive-through shed barge	1.5-4kg/Mg <sup>d</sup> (3-8 lb/ton)	D ✗
	1-4 kg/Mg <sup>d</sup> (2-8 lb/ton)	D
	1.5-4 kg/Mg <sup>d</sup> (3-8 lb/ton)	D

<sup>a</sup> Reference 2.

<sup>b</sup> Reference 3.

<sup>c</sup> Reference 4.

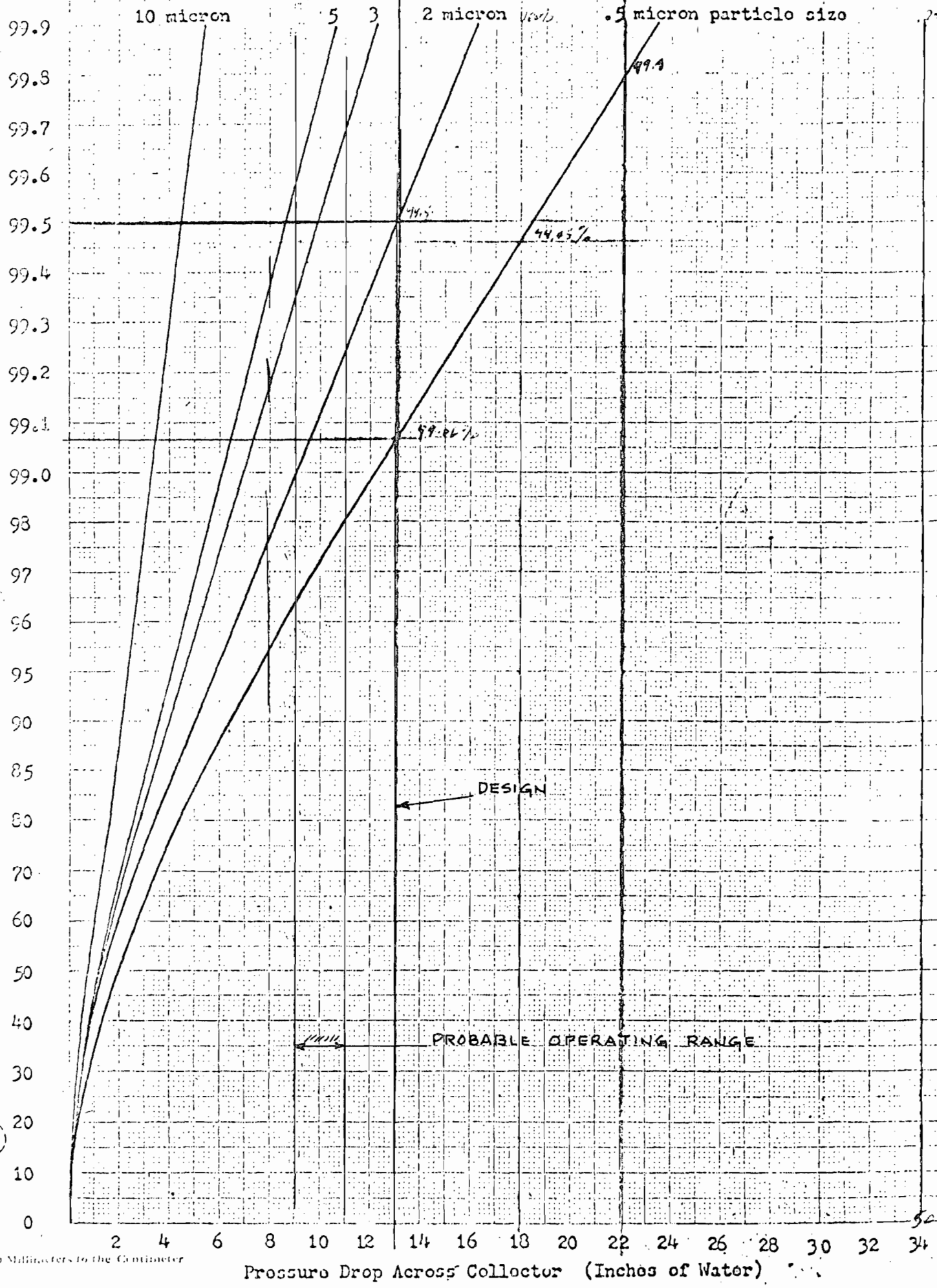
<sup>d</sup> Reference 1.



#### REFERENCES FOR SECTION 2.1.2

1. Emissions Control in the Feed and Grain Industry, Volume 1. Engineering and Cost Study, U.S. Environmental Protection Agency, Office of Air and Water Programs. EPA-450/3-73-003a. December 1973. pp. 118.
2. Emission estimate derived from a composite of six different loading/unloading operations' emissions as reported by three Florida phosphate plants. Unpublished paper prepared by Kenneth Axetell, PEDCo-Environmental Specialists, Inc., under U.S. Environmental Protection Agency Contract No. 68-02-1375, Task Order No. 9. March 1975.
3. Cross, F.L. Jr. and Forehand, G.D. Air Pollution Emissions from Bulk Loading Facilities, Volume 6, Environmental Nomograph Series. Technomic Publishing Co., Inc., Westport, Connecticut, 1975. pp. 3-4.
4. Environmental Assessment of Coal Transportation. PEDCo-Environmental Specialists, Inc. Prepared for U.S. Environmental Protection Agency. Contract No. 68-02-1321 Task 40, October 15, 1976. pp. 4-38 and 4-51.
5. Plant Visit. J.M. Zoller and R.S. Amick, PEDCo-Environmental, Inc., and G.H. Wood, U.S. Environmental Protection Agency. Visited Wyandotte Cement, Inc. Wyandotte, Michigan. October 26, 1976.

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to Millimeters to the Centimeter

Pressure Drop Across Collector (Inches of Water)

# UNIQUE DESIGN FEATURES

We would like to call your special attention to the unique wash section in the DeVansco Air Scrubber. To start with, the chair-mounted pump delivers the wash solution at the rate of 100's of gpm to the wash section through a large pipe that has no "T"s or "Y"s, nozzles or valves. In addition, this pipe is wide open at the discharge.

All of the gas to be cleaned is first exposed to the wash solution and then must pass through a *single rectangular venturi* thus avoiding a path of least resistance inherent in any multiple wash section.

The DeVansco dust collector has four compartments that are fabricated into one integral unit or installed separately, if desired.

The first component, the wash section is in the air inlet. The dirt laden air enters this section where the full capacity of the solution pump is impinged against the solution distributor. A pair of specially contoured easily adjusted baffles that forms a rectangular venturi, control the amount of air through the fan. The cleaning efficiency increases as the aperture is closed and the pressure drop through the venturi throat increases. The dirt, air and solution all go in the same direction to the solution tank for separation.

The second component, the solution tank, is the largest and heaviest portion of the collector. Here, the soil settles out and is removed by the sludge conveyor. The externally mounted chair-mount pump is fitted with unions permitting the discharge pipe to be disconnected and the pump to be removed without entering the tank or lowering the solution level. In this area the float valve, and overflow

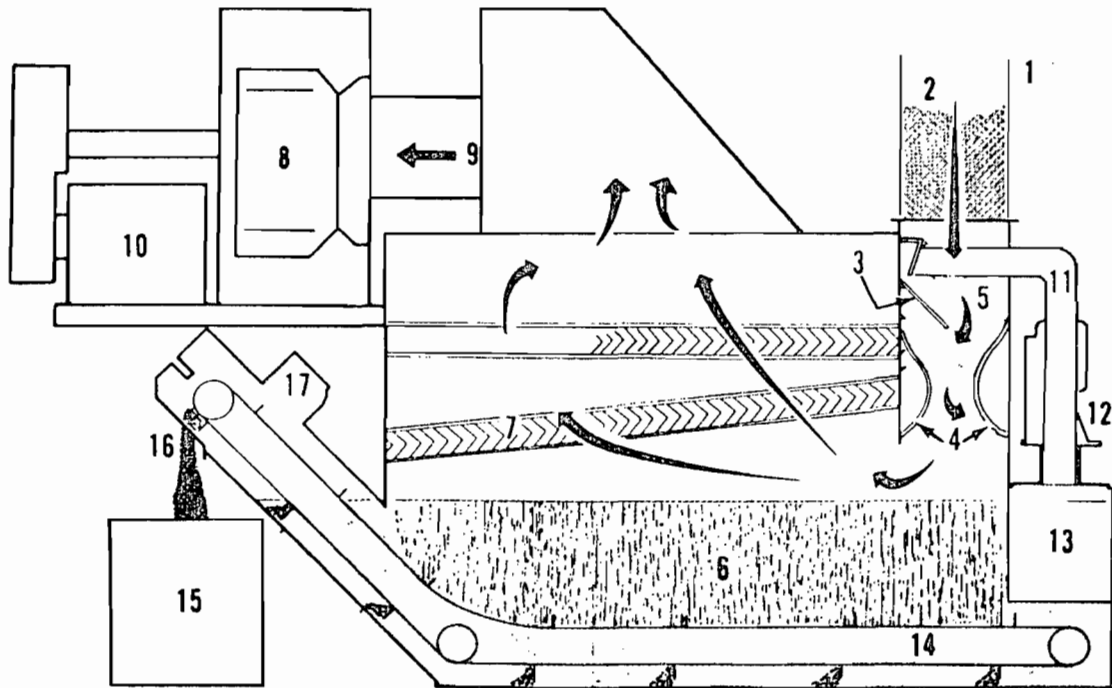
The rectangular venturi is easily adjusted by turning a knob on the outside wall of the wash section while the machine is running. This permits fine-tuning of the aperture in the venturi to give the very best performance.

Whatever the calculated inlet static pressure, be it 8 inches, 4 inches or 2 inches, after the installation is running any energy not needed to move the carrying gas to the air scrubber is thus transferred into higher cleaning efficiency and *not wasted* against an air volume control damper.

are also mounted so that they are externally accessible. Clear plastic lift-out panels permit quick access as well as observation of the inside of this section.

The third component, the moisture eliminator section, is above the solution tank. The galvanized steel moisture eliminators efficiently remove all of the free moisture from the washed air. These eliminator sections can be observed and are quickly accessible through the clear plastic lift-out doors from outside the unit, without the use of ladders.

The fourth component, the fan section, is mounted over the sludge conveyor. Because the fan section is a separate component (the lower fan shaft does not drive a slinger, squirrel cage or pump), it operates at the optimum of the cfm, power and static pressure curves. It is equipped with a quick latching door, motor mount and a V-belt drive with a hinged expanded metal belt guard. An ammeter in the control panel monitors the fan loading.



- |                                    |                                  |
|------------------------------------|----------------------------------|
| 1 – CUSTOMER'S INLET DUCT          | 10 – FAN MOTOR                   |
| 2 – INCOMING DIRTY AIR             | 11 – PUMP DISCHARGE              |
| 3 – WATER DISTRIBUTOR              | 12 – PUMP                        |
| 4 – ADJUSTABLE RECTANGULAR VENTURI | 13 – PUMP INLET                  |
| 5 – WASH SECTION                   | 14 – SLUDGE CONVEYOR             |
| 6 – SOLUTION TANK                  | 15 – CUSTOMER'S SLUDGE CONTAINER |
| 7 – MOISTURE ELIMINATORS           | 16 – SLUDGE CONVEYOR DISCHARGE   |
| 8 – FAN                            | 17 – SLUDGE CONVEYOR DRIVE       |
| 9 – OUTGOING CLEAN AIR             |                                  |

# UNIQUE SERVICE FEATURES

**MOISTURE ELIMINATORS** — These units are located above the solution tank and are visible through the acrylic access panels. The lower moisture eliminator is also an air distributor and is located angularly four feet above the floor on a 30,000 cfm unit. The upper moisture eliminator is horizontally located six feet above floor level.

**ACCESS PANELS** — All access panels are clear acrylic for internal visibility. Each door is light, has no clamps and is quickly removed by raising it two inches.

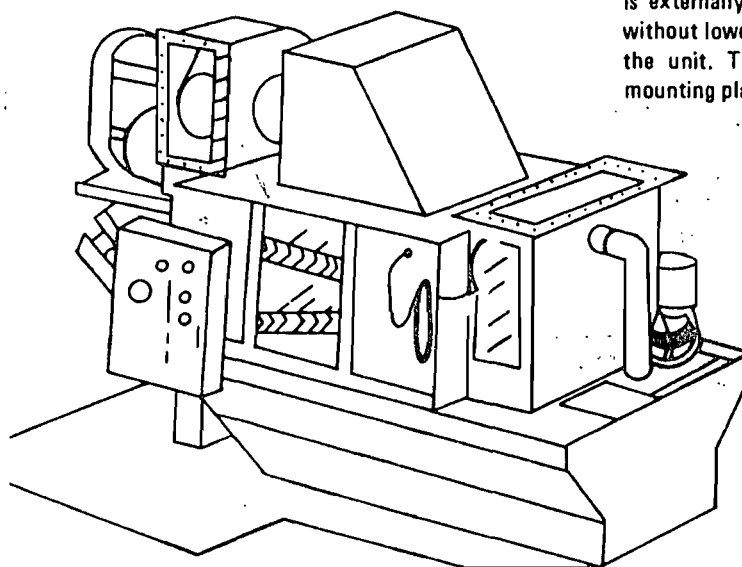
**SLUDGE CONVEYOR** — The sludge conveyor carries sediment out of the solution tank and deposits it in a customer furnished sludge container.

**AMMETER** — The ammeter, mounted on electrical control panel, continuously monitors the fan motor loading.

**WASH SECTION** — This section is included in the air inlet duct and is visible through full length acrylic access panels. It includes a solution distributor and the easily adjusted rectangular venturi. The wash section and air inlet may be located at either end of the unit.

**FAN SECTION** — The fan section is a separate component and may be installed on the unit or at any convenient location. An ammeter in the control panel monitors fan loading. Since the fan motor is used solely to drive the fan, the fan is operated at the optimum of the cfm; power, and static pressure curves.

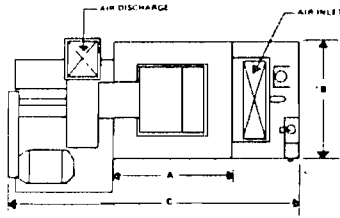
**CHAIR-MOUNTED PUMP** — The pump is externally mounted and can be removed without lowering the solution level or entering the unit. There are no bearings below the mounting plate.



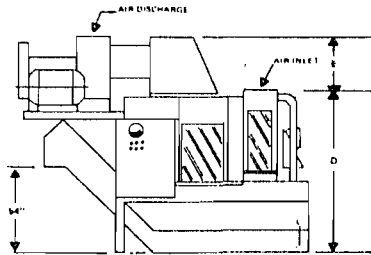
**U TUBE MANOMETER** — The U tube manometer, mounted on unit connected to flexible tubing and quick disconnect valves, permits a quick reading of the total fan static pressure, the inlet static pressure, the pressure drop through the wash section and the pressure drop through the moisture eliminator section.

**SOLUTION TANK SECTION** — This section collects sediment from the air and the moisture removed from the air by the moisture eliminators. Sediment is carried away by the sludge conveyor. This section includes the float valve, pump inlet screens and an overflow.

**DeVANSCO COLLECTOR WITH SLUDGE CONVEYOR**



Plan View



Elevation

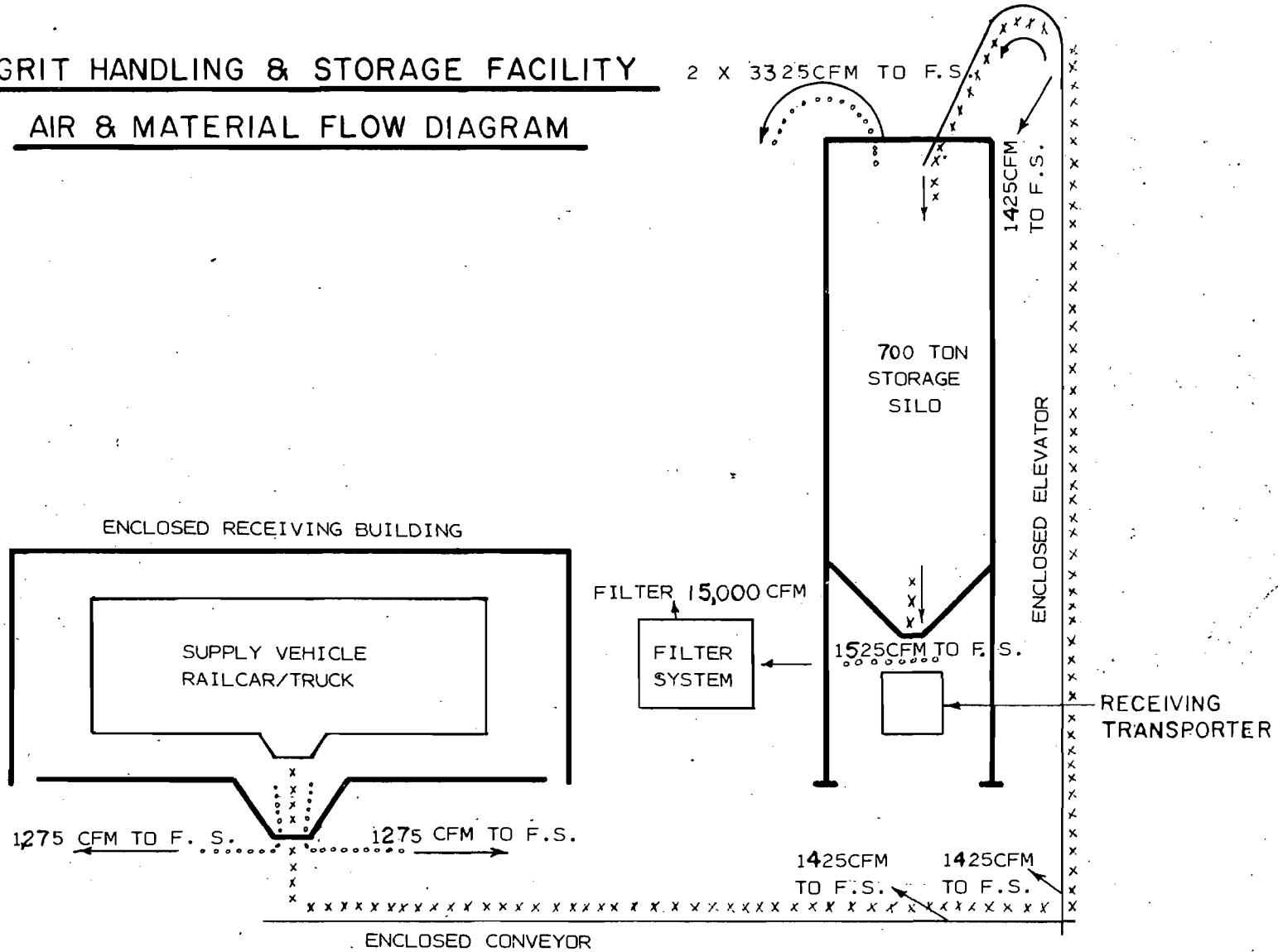
**NOTES:**

- (1) All dimensions are approximate. Dimensions on each unit may vary depending on collector application.
- (2) \*Dimension "E" will vary due to fan size and configuration.
- (3) All collectors are fabricated from 1/4" mild steel plate. Collectors with stainless steel tanks and rust resistant upper housings are optional.
- (4) Direction of fan discharge is a customer option.
- (5) For applications above 40,000 cfm please consult with DeVansco engineering or sales personnel.

Capacity CFM	A	B	C	D	E*	Air Inlet	Pump		Fan		Sludge Conveyor Motor HP	Water Cap. Gal.	Approx. Weight (Dry)
							Capacity/Motor GPM	HP	13" SP	18" SP			
5,000	60	48	148	96	30	12x24	230	2	15	25	1	600	6,200
7,500	60	48	148	96	30	12x24	230	2	25	30	1	600	6,700
10,000	74	48	162	96	30	12x36	430	3	30	40	1	700	7,200
15,000	73	72	176	111	41	17x48	430	3	50	60	1	800	9,200
17,500	85	72	176	111	45	17x48	730	5	60	75	1	1,050	10,000
20,000	97	72	196	111	50	17x48	730	5	60	75	1	1,200	10,600
25,000	102	84	217	111	54	17x60	730	5	75	100	1	1,500	12,000
30,000	126	84	228	111	57	17x60	730	5	100	150	1	1,800	13,400
35,000	138	84	240	124	62	24x60	730	5	100	150	1	2,100	15,400
40,000	165	84	267	124	62	24x60	730	5	125	200	1	2,300	16,200

GRIT HANDLING & STORAGE FACILITY

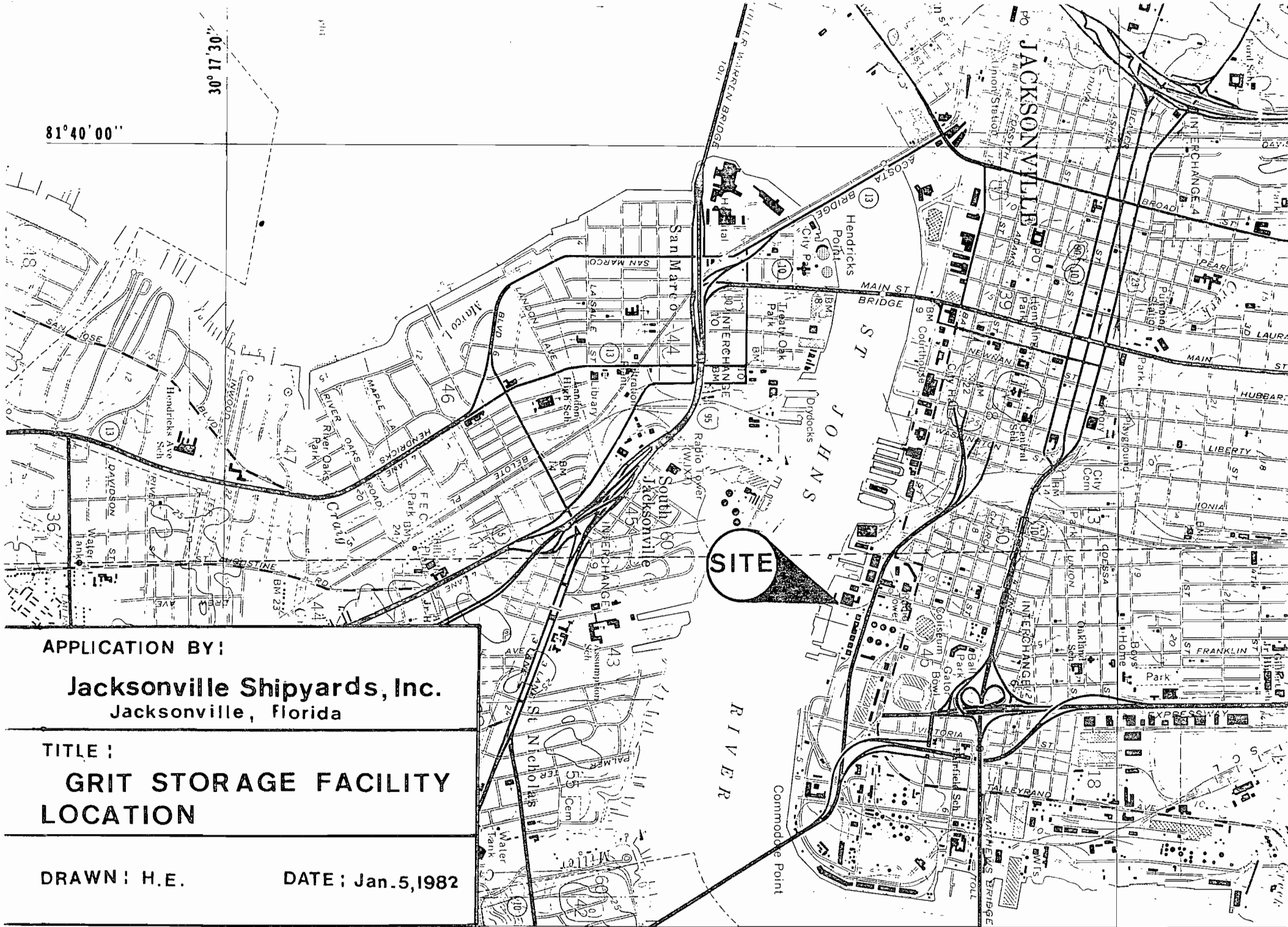
AIR & MATERIAL FLOW DIAGRAM



GRIT FLOW  $\xrightarrow{\text{xxxxxxxxxx}}$   
AIR FLOW  $\xrightarrow{\text{oooooooooo}}$   
TO FILTER SYSTEM

81° 40' 00"

30° 17' 30"



APPLICATION BY:

**Jacksonville Shipyards, Inc.**  
Jacksonville, Florida

TITLE :

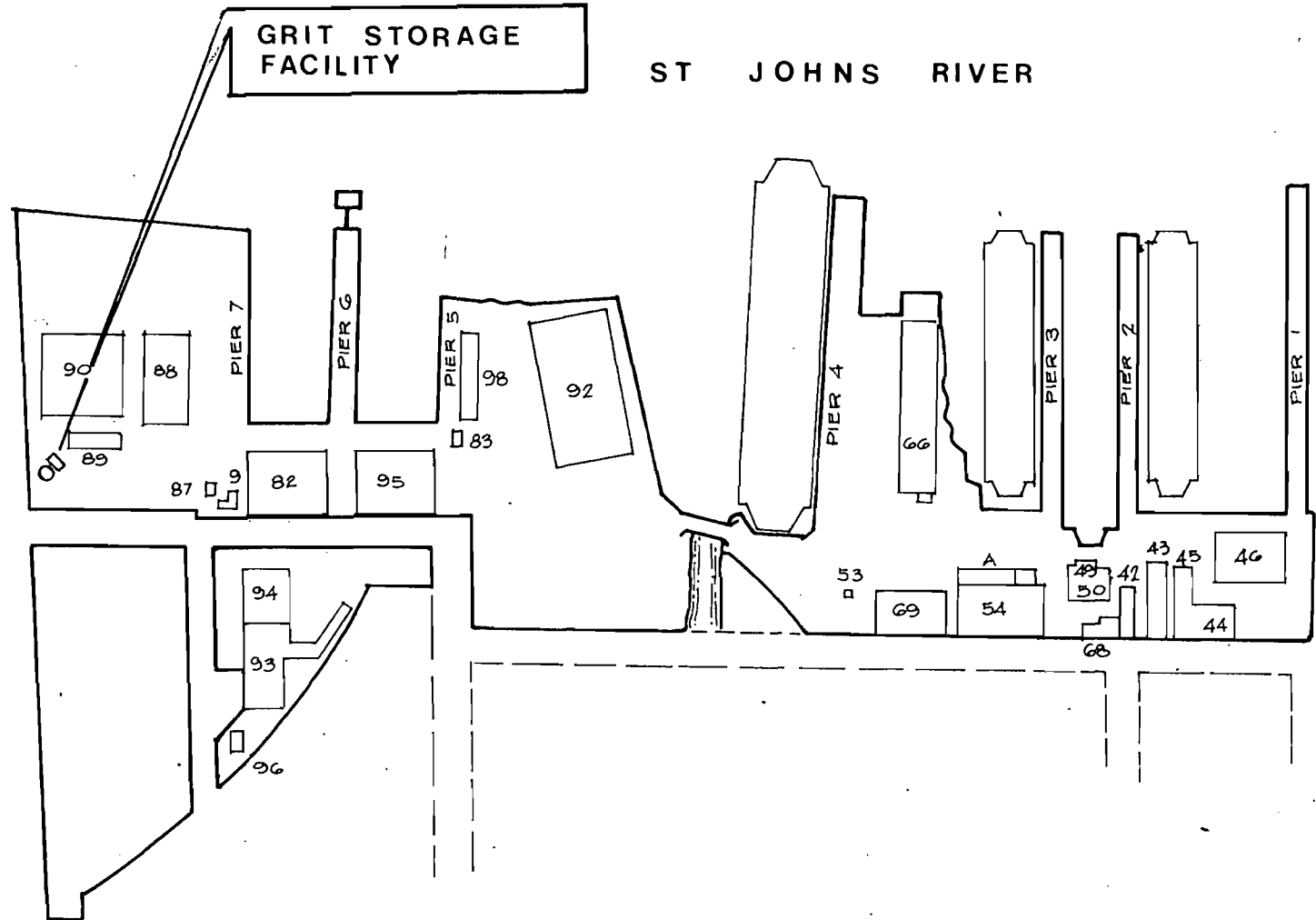
**GRIT STORAGE FACILITY  
LOCATION**

DRAWN: H.E.

DATE: Jan. 5, 1982

LEGEND  
BUILDING NUMBERS

- A PRODUCTION OFFICE WEST
- B PRODUCTION OFFICE EAST
- 42 PORT ENGINEERS
- 43 BOILER SHOP, ABS, USCG & BLUEROOM
- 44 NEW PIPE SHOP
- 45 OLD PIPE SHOP
- 46 FAB SHOP (FUTURE PIPE SHOP)
- 49 ELECTRIC SHOP
- 50 COMPRESSOR HOUSE
- 53 GUARD SHACK WEST
- 54 MACHINE SHOP & PROD. OFFICE
- 61 GARAGE
- 66 SHIPPING & RECEIVING, CARPENTER, PAINT & LABOR SHOP
- 68 SWITCH GEAR
- 69 ADMINISTRATION OFFICES
- 82 GARAGE/Crane MAINTENANCE (NEW)
- 83 COMPRESSOR
- 87 GUARD SHACK
- 88 ARCHIVES
- 89 CRANE MAINTENANCE
- 90 WAREHOUSE
- 91 CONCESSION STAND
- 92 OWNER SPARE PARTS
- 93 ELECTRO LUBE PROD.
- 94 WAREHOUSE
- 95 NEW FAB SHOP, WELDING TRAINING WELDING BURNING DEP.
- 96 ELECTRO LUBE OFFICE
- 97 SALVAGE STORE
- 98 BLAST FACILITY
- 99 PRODUCTION OFFICE & TOOLROOM



APPLICATION BY:

**Jacksonville Shipyards, Inc.**  
Jacksonville, Florida

TITLE:

**GRIT STORAGE FACILITY  
LOCATION**

DRAWN: H.E.

DATE: Jan. 5, 1982



- 9. An application fee of \$20, unless exempted by Section 17-4.05(3), F.A.C. 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**

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: | 4. Capital Costs:    |
| 2. Operating Principles:  | 5. Useful Life:      |
| 3. Efficiency: *          | 6. Operating Costs:  |
| 7. Energy:                | 8. Maintenance Cost: |
| 9. Emissions:             |                      |

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____
_____	_____

\*Explain method of determining D 3 above.

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\*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy\*:
- 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\*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy\*\*:
- h. Maintenance Costs:
- 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:

\*Explain method of determining efficiency.

\*\*Energy to be reported in units of electrical power – KWH design rate.

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency\*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- h. Maintenance Cost:

\*Explain method of determining efficiency above.

- 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\*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- 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\*:
- 3. Capital Cost:
- 4. Life:
- 5. Operating Cost:
- 6. Energy:
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:

a.

- (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:
- (5) Environmental Manager:
- (6) Telephone No.:

\*Explain method of determining efficiency above.

(7) Emissions\*:

Contaminant	Rate or Concentration

(8) Process Rate\*:

b.

- (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

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

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions\*:

Contaminant	Rate or Concentration
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(8) Process Rate\*:

10. Reason for selection and description of systems:

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

