

Check Sheet

Company Name: Monsanto Chemical Company  
Permit Number: AC17-184414  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- |   |                          |
|---|--------------------------|
| <input checked="" type="checkbox"/> Initial Application | Cross References:        |
| <input type="checkbox"/> Incompleteness Letters         | <input type="checkbox"/> |
| <input type="checkbox"/> Responses                      | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action    | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response            |                          |
| <input type="checkbox"/> Other                          |                          |

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
  - Park Services
  - Other
- 2  Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
  - Waiver of Department Action
  - Other

**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)    2.  Restricted Delivery (Extra charge)

3. Article Addressed to: <i>Mr. W.J. Board          Monsanto Co.          P.O. Box 12830          Pensacola, FL          32575</i>	4. Article Number <i>P407 852 924</i>
5. Signature - Addressee <i>X</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent <i>X Bob Putney</i>	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989      \*U.S.G.P.O. 1989-238-815      DOMESTIC RETURN RECEIPT

**P 407 852 924**  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

U.S.G.P.O. 1989-234-555           PS Form 3800, June 1985	Sent to <i>W J Board</i>	
	Street and No. <i>Monsanto Co</i>	
	P.O. State and ZIP Code <i>Pensacola, FL</i>	
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	
	Return Receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
Postmark or Date <i>1-16-91</i>		
<i>AC 17-184414</i>		



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. W. J. Board, Gen. Supt.  
Monsanto Company  
Post Office Box 12830  
Pensacola, Florida 32575

January 15, 1991

Enclosed is construction permit AC 17-184414 to construct an electric motor pyrolysis oven (Model IGG 88 Controlled Pyrolysis Cleaning Furnace) at your chemical plant in Gonzalez, Escambia County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

E. Middleswart, NW Dist.  
B. McLeod, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 1-16-91.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Keri Deber  
Clerk

1-16-91  
Date

Final Determination

Monsanto Company  
Escambia County  
Pensacola, Florida

Electric Motor Pyrolysis Oven  
Permit No. AC 17-184414

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

January 11, 1991

## Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct an electric motor pyrolysis oven (Model IGG 88 Controlled Pyrolysis Cleaning Furnace) at Monsanto Company in Gonzalez, Escambia County, Florida, was distributed on August 24, 1990. The Notice of Intent to Issue was published in the Pensacola News Journal on October 25, 1990. Copies of the evaluation were available for public inspection at the Department's offices in Pensacola and Tallahassee.

No comments were submitted on the Department's Intent to Issue the permit. The final action of the Department will be to issue construction permit AC 17-184414 as proposed in the Technical Evaluation and Preliminary Determination.



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:  
Monsanto Company  
P. O. Box 12830  
Pensacola, Florida 32575

Permit Number: AC 17-184414  
Expiration Date: Aug. 1, 1992  
County: Escambia  
Latitude/Longitude: 30°35'56"N  
87°15'01"W  
Project: Electric Motor Pyrolysis  
Oven

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 Model IG88 Controlled Pyrolysis Cleaning Furnace at the existing facility located in Escambia County, north of Pensacola, Florida, at the intersection of State Roads 292 and 297. The UTM coordinates of this source are: Zone 16, 476.01 km E and 3384.99 km N.

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

Attachments are listed below:

1. Application to construct air pollution sources, DER Form 17-1.202(1), which was received on July 24, 1990, by the Bureau of Air Regulation.

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**GENERAL CONDITIONS:**

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

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.



PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

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

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. Only varnish coated electric motor windings are to be pyrolyzed in this furnace.
2. The amount of varnish pyrolyzed shall not exceed 15 lbs/hr.
3. Continuous operation of the electric motor pyrolysis oven is approved (8,760 hours annually).
4. Visible emissions (VE) shall not exceed 5% opacity except that visible emissions of up to 20% opacity are allowed for 3 minutes in any one hour period. Compliance with this standard shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources. The aforementioned Method is contained in 40 CFR 60, Appendix A (July 1, 1988) and is adopted by reference in F.A.C. Rule 17-2.700. The permittee shall notify the district office in writing at least 15 days in advance of the compliance test. A compliance test shall be conducted at least 90 days prior to the expiration date of this construction permit or within 45 days after placing the unit in service, whichever date occurs first.

PERMITTEE:  
Monsanto Company

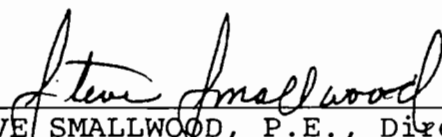
Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

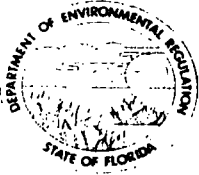
**SPECIFIC CONDITIONS:**

5. Objectionable odor shall not be allowed from the furnace.
6. Afterburner temperature must exceed 1400°F when the furnace is in operation and the initial operation temperature shall be recorded each time the unit is placed in service.
7. Construction and operation shall reasonably conform to the plans submitted in the application. The permittee shall report any delay in construction of this project to the Department's Northwest District office.
8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
9. An application for an operation permit must be submitted to the Northwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 15<sup>th</sup> day  
of January, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Steve Smallwood  
FROM: Clair Fancy *CF*  
DATE: January 11, 1991  
SUBJ: Approval of Construction Permit AC 17-184414  
Monsanto Company

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct an electric motor pyrolysis oven (Model IGG 88 Controlled Pyrolysis Cleaning Furnace) at their chemical plant in Gonzalez, Escambia County, Florida.

No comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is January 20, 1991.

I recommend your approval and signature.

CF/WH/plm

Attachments

*OK*  
*Thank you*

**Monsanto RECEIVED**

**DEC 10 1990**

MONSANTO CHEMICAL COMPANY  
P. O. Box 12830  
Pensacola, Florida 32575-2830  
Phone: (904) 968-7000

**DER-BAQM**

December 6, 1990

Mr. C. H. Fancy, P.E.  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Attached is proof of publication of the second public notice for construction permit AC17-184414, Electric Motor Furnace, as requested by Willard Hanks of your Bureau.

Also attached are four copies of amended page 1 of the construction permit application showing the correct location description.

Sincerely,



Bruce P. McLeod  
Consultant  
Environmental Regulatory Affairs

Attachments

*cc: St. Hanks  
g. Price, NW Dist*

2014A.BPM

PENSACOLA  
**News Journal**

PUBLISHED DAILY  
PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,  
County of Escambia.

Before the undersigned authority personally appeared

~~CINDY VANCE~~

who on oath says that she is Legal Advertising Supervisor of the Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

Intent to Issue

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

was published in said newspaper in the issues of \_\_\_\_\_

Oct. 25, 1990

Affiant further say that the said The Pensacola News Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida, each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Cindy Vance

Sworn to and subscribed before me this 3rd

day of Dec., A.D. 19 90

Betty J. Horton  
NOTARY PUBLIC.

My Commission Expires October 26, 1991

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

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to construct a Model IGG88 Controlled Pyrolysis Cleaning Furnace to clean electric motor windings at Monsanto Company's existing facility at 3000 Old Chemstrand Road, Gonzalez, Escambia County, Florida. A determination of Best Available Control Technology (BACT) was not required. The emissions from the furnace from the varnish coating of the electric motor windings will not have a significant impact on the ambient air quality. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information:

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

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

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

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

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

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

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

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER  
PENSACOLA, FLORIDA 32501



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

ROBERT V. KRIEGER  
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Construction [x] New<sup>1</sup> [ ] Existing<sup>1</sup>

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

COMPANY NAME: Monsanto Company COUNTY: Escambia

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Electric Motor Pyrolysis Oven

SOURCE LOCATION: Street 3000 Old Chemstrand Road City Gonzalez, FL

UTM: East Zone 16 476 km North Zone 16 3385 km

Latitude 30 ° 35 ' 56 "N Longitude 87 ° 15 ' 01 "W

APPLICANT NAME AND TITLE: W. J. Board, General Superintendent, EHS/GA

APPLICANT ADDRESS: P. O. Box 12830, Pensacola, FL 32575

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Monsanto Company

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

\*Attach letter of authorization

Signed: WJ Board  
W. J. Board, Gen. Supt., EHS/GA

Name and Title (Please Type)

Date: 7/20/90 Telephone No. 904/968-7350

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

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)

# Monsanto

MONSANTO CHEMICAL COMPANY  
P. O. Box 12830  
Pensacola, Florida 32575-2830  
Phone: (904) 968-7000

RECEIVED

SEP 24 1990

DER-BAQM

VIA OVERNIGHT MAIL

September 21, 1990

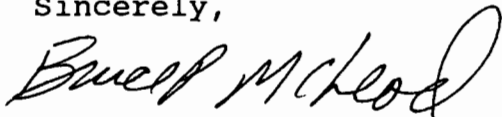
Mr. C. H. Fancy, P.E.  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Attached is proof of publication of the public notice for construction permit AC17-184414, Electric Motor Furnace.

Please issue this construction permit as soon as possible

Sincerely,



Bruce P. McLeod  
Consultant  
Environmental Regulatory Affairs

Attachment

*ck w/Willard*  
incorrect location  
in the PN!!!  
will re-advertise

1983.BPM

PENSACOLA  
**News Journal**

PUBLISHED DAILY  
PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,  
County of Escambia.

Before the undersigned authority personally appeared

Cindy Vance  
who on oath says that she is Legal Advertising Supervisor  
of the Pensacola News Journal, a daily newspaper published at Pensacola in  
Escambia County, Florida; with general circulation in Escambia, Santa  
Rosa, Okaloosa and Walton Counties that the attached copy of  
advertisement, being a NOTICE in the matter of

Intent to Issue,

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

was published in said newspaper in the issues of \_\_\_\_\_

September 12, 1990

Affiant further say that the said The Pensacola News  
Journal is a newspaper published at Pensacola, in said Escam-  
bia County, Florida, and that the said newspaper has heretofore  
been continuously published in said Escambia County, Florida,  
each day and has been entered as second class mail matter at  
the post office in Pensacola, in said Escambia 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 cor-  
poration any discount, rebate, commission or refund for the  
purpose of securing this advertisement for publication in the  
said newspaper.

Cindy Vance

Sworn to and subscribed before me this \_\_\_\_\_

day of Sept, A.D., 1990

[Signature]

NOTARY PUBLIC.

My Commission Expires October 26, 1991

**LEGAL NOTICE**

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

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to construct a Model IGG88 Controlled Pyrolysis Cleaning Furnace to clean electric motor windings at Monsanto Company's existing facility near the intersection of State Roads 292 and 297 near Pensacola, Escambia County, Florida. A determination of Best Available Control Technology (BACT) was not required. The emissions from the furnace from the varnish coating of the electric motor windings will not have a significant impact on the ambient air quality. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name, and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;  
(e) A statement of acts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

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

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

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

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


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

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address.      2.  Restricted Delivery (Extra charge)

<p>3. Article Addressed to:  <i>W.S. Board</i>  <i>Monsanto Co.</i>  <i>P.O. Box 12830</i>  <i>Pensacola, FL 32575</i></p>	<p>4. Article Number  <i>P 256 396 182</i></p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered      <input type="checkbox"/> Insured  <input checked="" type="checkbox"/> Certified      <input type="checkbox"/> COD  <input type="checkbox"/> Express Mail      <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b></p>
<p>5. Signature - Address  <i>X</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p> 
<p>6. Signature - Agent  <i>X</i> <i>Bob Peetry</i></p>	
<p>7. Date of Delivery</p>	

P 256 396 182

**RECEIPT FOR CERTIFIED MAIL**

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

U.S.G.P.O. 1989-234-555

Sent to	<i>W.S. Board</i>
Street and No.	<i>Monsanto Co</i>
P.O. State and ZIP Code	<i>P.O. Box 12830</i>
Postage	<i>Pensacola, FL</i>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	<i>8-24-90</i>
	<i>AC 17-18444</i>

PS Form 3800, June 1985



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 20, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. W. J. Board, Gen. Supt.  
Monsanto Company  
Post Office Box 12830  
Pensacola, Florida 32575

Dear Mr. Board:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a Model IGG88 Controlled Pyrolysis Cleaning Furnace to clean electric motor windings at your existing facility in Pensacola, Escambia County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

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

CHF/WH/plm

Attachments

c: E. Middleswart, NW Dist.  
B. McLeod, P.E.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Monsanto Company  
Post Office Box 12830  
Pensacola, Florida 32575

DER File No. AC 17-184414

---

INTENT TO ISSUE

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

The applicant, Monsanto Company, applied on July 24, 1990, to the Department of Environmental Regulation for a permit to construct a Model IGG88 Controlled Pyrolysis Cleaning Furnace to clean electric motor windings at their existing facility in Pensacola, Escambia County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such



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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



---

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

Copies furnished to:

E. Middleswart, NW Dist.  
B. McLeod, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 8-24-90.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Kym Joben  
Clerk

8-24-90  
Date

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

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to construct a Model IGG88 Controlled Pyrolysis Cleaning Furnace to clean electric motor windings at Monsanto Company's existing facility near the intersection of State Roads 292 and 297 near Pensacola, Escambia County, Florida. A determination of Best Available Control Technology (BACT) was not required. The emissions from the furnace from the varnish coating of the electric motor windings will not have a significant impact on the ambient air quality. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

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

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

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

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

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

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Monsanto Company  
Escambia County  
Pensacola, Florida

Electric Motor Pyrolysis Oven  
File No. AC 17-184414

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

August 20, 1990

## I. Project Description

### A. Applicant

Monsanto Company  
P. O. Box 12830  
Pensacola, Florida 32575

### B. Project and Location

The company submitted an application for permit to construct a Model IGG88 Controlled Pyrolysis Cleaning Furnace (oven) equipped with an internal afterburner (fume incinerator) to remove the varnish coatings for electric motor windings on July 24, 1990. This process equipment is also called the electric motor pyrolysis oven. The application was considered complete on receipt. Industrial source codes are: SIC 4953; SCC 5-03-001-01 and 5-03-900-06.

This furnace is to be located at the existing site of the Monsanto Fibers and Intermediates Company in Escambia County. The facility is just north of Pensacola, Florida, at the intersection of State Roads 292 and 297; UTM coordinates: Zone 16, 476.01 km E and 3384.99 km N.

### C. Process

The furnace will be used to remove 15 lbs/hr of varnish from electric motor windings by melting/burning. The windings to be cleaned are placed in the furnace which operates at temperatures above 800°F. A reducing condition exists in the furnace which allows the varnish to melt rather than burn. Some of the varnish in the furnace does sublime, leaving the furnace and being destroyed by the afterburner.

The afterburner is designed to operate at a temperature above 1400°F and receives all exhaust gases from the furnace. The afterburner operates in an oxidizing environment and burns the combustible gases from the furnace. The predominant products of the afterburner are CO<sub>2</sub> and water vapor. Small amounts of NO<sub>x</sub> and particulate matter are also produced and vented to the atmosphere.

The primary furnace is not operable unless the afterburner is in operation. Both the primary furnace and afterburner are fired on natural gas.

## II. Rule Applicability

The proposed project, construction of an electric motor winding controlled pyrolysis cleaning furnace with an afterburner, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The facility is located in an area designated unclassifiable for sulfur dioxide (F.A.C. Rule 17-2.430) and attainment for all criteria pollutants (F.A.C. Rule 17-2.420).

The plant is at a major source of volatile organic compounds (F.A.C. Rule 17-2.100) as total emissions exceed 100 TPY. The proposed source will emit less than the significant emission rates of any criteria pollutants listed in Table 500-2.

The project is not subject to the prevention of significant deterioration (PSD) regulations (F.A.C. Rule 17-2.500) because it does not cause a significant emissions increase of any criteria pollutant.

As the area in which the facility is located is designated attainment for all criteria pollutants, it is not subject to new source review for nonattainment areas (F.A.C. Rule 17-2.510(2)(a)1.).

The project is subject to F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. Control of emissions shall be based on F.A.C. Rule 17-2.600(1)(a), emission standards for incinerators.

### III. Technical Evaluation

The proposed source will operate similiary to a starved-air incinerator equipped with an afterburner.

The furnace is a two stage design with the primary chamber (oven) inoperable unless the secondary chamber (afterburner) is operating. Up to 15 lbs/hr of varnish on electric motor windings will be removed with this unit. The furnace is charged in the batch-feed mode. Electric motor windings with varnish coatings are placed in the furnace whereby the reducing atmosphere inhibits combustion of volatiles while promoting a melt phase of the varnish. The melted varnish is collected below in a cooling chamber. The primary chamber (oven) is operated above 800°F and is fired on natural gas. The pyrolysis rate in the primary chamber is controlled by water quenching. The rate of water flow is adjusted to maintain the proper temperature.

Smoke and a volatile fraction of the varnish coating are produced in the oven and then routed to the secondary chamber (afterburner). The afterburner is designed to operate on natural gas at a minimum temperature of 1400°F. This temperature and an oxidizing atmosphere allow for burning of the combustible products from the furnace stage. A retention time of one-half second is an operation parameter.

The effluent from the stack contains particulate matter, carbon dioxide, NO<sub>x</sub> and water vapor. This is discharged to the atmosphere via a 20 foot high, 10 inch inside diameter stack.

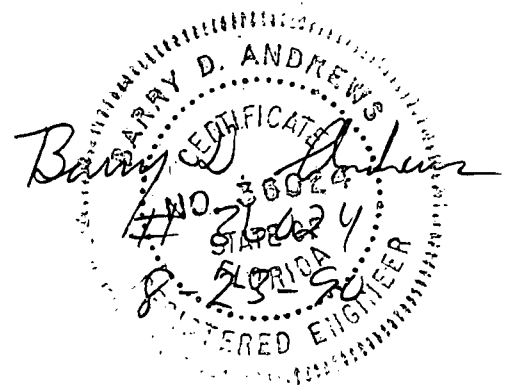
The Department's regulations impose a visible emissions standard on small incinerators. This standard is no visible emissions are allowed except, for 3 minutes in any 1 hour period, visible emissions not exceeding 20% opacity are allowed. Incinerators are not allowed to emit pollutants that cause objectionable odors. With proper maintenance and operation, the proposed incinerator should comply with these standards.

#### IV. Ambient Air Quality

It is the judgement of the Department that the allowable emissions from the proposed unit will not have a significant impact on the ambient air quality.

#### V. Conclusion

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







# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**  
Monsanto Company  
P. O. Box 12830  
Pensacola, Florida 32575

Permit Number: AC 17-184414  
Expiration Date: Aug. 1, 1992  
County: Escambia  
Latitude/Longitude: 30°35'56"N  
87°15'01"W  
Project: Electric Motor Pyrolysis  
Oven

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 Model IG88 Controlled Pyrolysis Cleaning Furnace at the existing facility located in Escambia County, north of Pensacola, Florida, at the intersection of State Roads 292 and 297. The UTM coordinates of this source are: Zone 16, 476.01 km E and 3384.99 km N.

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

Attachments are listed below:

1. Application to construct air pollution sources, DER Form 17-1.202(1), which was received on July 24, 1990, by the Bureau of Air Regulation.

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

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

**PERMITTEE:**  
Monsanto Company

**Permit Number:** AC 17-184414  
**Expiration Date:** August 1, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. Only varnish coated electric motor windings are to be pyrolyzed in this furnace.
2. The amount of varnish pyrolyzed shall not exceed 15 lbs/hr.
3. Continuous operation of the electric motor pyrolysis oven is approved (8,760 hours annually).
4. Visible emissions (VE) shall not exceed 5% opacity except that visible emissions of up to 20% opacity are allowed for 3 minutes in any one hour period. Compliance with this standard shall be determined by EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources. The aforementioned Method is contained in 40 CFR 60, Appendix A (July 1, 1988) and is adopted by reference in F.A.C. Rule 17-2.700. The permittee shall notify the district office in writing at least 15 days in advance of the compliance test. A compliance test shall be conducted at least 90 days prior to the expiration date of this construction permit or within 45 days after placing the unit in service, whichever date occurs first.

PERMITTEE:  
Monsanto Company

Permit Number: AC 17-184414  
Expiration Date: August 1, 1992

**SPECIFIC CONDITIONS:**

5. Objectionable odor shall not be allowed from the furnace.
6. Afterburner temperature must exceed 1400°F when the furnace is in operation and the initial operation temperature shall be recorded each time the unit is placed in service.
7. Construction and operation shall reasonably conform to the plans submitted in the application. The permittee shall report any delay in construction of this project to the Department's Northwest District office.
8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
9. An application for an operation permit must be submitted to the Northwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1990

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION**

---

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

# Monsanto

MONSANTO CHEMICAL COMPANY  
P. O. Box 12830  
Pensacola, Florida 32575-2830  
Phone: (904) 968-7000

July 12, 1990

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

Dear Mr. Fancy:

Enclosed are four copies of a construction permit application for an Electric Motor Pyrolysis Oven and a check for \$200.00 to cover the application fee.

I can be reached at 904/968-8725 for questions.

Sincerely,



Bruce P. McLeod  
Consultant  
Environmental Regulatory Affairs

Enclosures

cc: J. G. Wiley, Monsanto, Pensacola

*A. Hanks*

*E. Middlewart, w/o Dist.*

RECEIVED  
ENV. MAIL ROOM  
1990 JUL 24 AM 10:40

1031

1893.BPM

Monsanto

WORKING FUND ACCOUNT  
MONSANTO COMPANY  
PENSACOLA, FLORIDA

72014265

62-20  
311

07-20-90

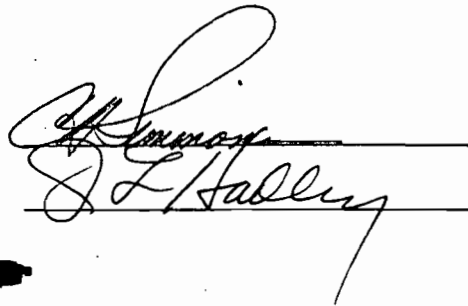
\$200.00

EXACTLY **PAY 200000** CTS

PAY  
TO THE  
ORDER  
OF

DEPARTMENT OF ENVIRONMENTAL REGULATION

Citibank (Delaware)



-30

MONSANTO COMPANY, PENSACOLA, FLORIDA  
07-20-90

72014265

THE ATTACHED CHECK IS IN PAYMENT OF THE FOLLOWING:

DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMO	DATE	INVOICE NO.	AMOUNT	DEDUCTIONS & DISCOUNT	NET
Electric Motor Pyrolysis even permit fee - P. McLeod	07-20-90		\$200.00		\$200.00

DETACH BEFORE DEPOSITING





#200pd,  
7-24-90  
Recept. #151145

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT  
160 GOVERNMENTAL CENTER  
PENSACOLA, FLORIDA 32501



AC17-184414

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY  
ROBERT V. KRIEGL  
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Construction [x] New<sup>1</sup> [ ] Existing<sup>1</sup>  
APPLICATION TYPE: [x] Construction [ ] Operation [ ] Modification  
COMPANY NAME: Monsanto Company COUNTY: Escambia  
Identify the specific emission point source(s) addressed in this application (i.e. Lime  
Kila No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Electric Motor Pyrolysis  
SOURCE LOCATION: Street Intersection State Rds. 292 and 297 City Oven  
UTM: East Zone 16 476 km North Zone 16 3385 km  
Latitude 30 ° 35 ' 56 "N Longitude 87 ° 15 ' 01 "W  
APPLICANT NAME AND TITLE: W. J. Board, General Superintendent, EHS/GA  
APPLICANT ADDRESS: P. O. Box 12830, Pensacola, FL 32575

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

\*Attach letter of authorization

Signed: WJ Board  
W. J. Board, Gen. Supt., EHS/GA  
Name and Title (Please Type)  
Date: 7/20/90 Telephone No. 904/968-7350

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

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)

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

Signed Bruce P. McLeod, P.E.

Bruce P. McLeod, P.E.

Monsanto Company  
Name (Please Type)

P. O. Box 18230, Pensacola, FL 32575  
Company Name (Please Type)  
Mailing Address (Please Type)

Florida Registration No. 26956 Date: 7/20/90 Telephone No. 904-968-8725

**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.

Purchase and install an electric motor pyrolysis oven with integral afterburner.

Unit will be a Pollution Control Products Co. unit IGG88 (see attached brochure).

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction \_\_\_\_\_ Completion of Construction 18 mos. after permit issuance

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.)

No separate pollution control systems. Afterburner is integral to the pyrolysis unit.

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

Same type of unit as those permitted in AC17-127872 and 142980

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;  
if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

F. 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? No

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? No  
If yes, see Section VI.

3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? No

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

a. If yes, for what pollutants? \_\_\_\_\_

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

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

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

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

SEE SECTION IV

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

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

1. Total Process Input Rate (lbs/hr): \_\_\_\_\_
2. Product Weight (lbs/hr): \_\_\_\_\_

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

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

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

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

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

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

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

SEE SECTION IV

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: \_\_\_\_\_ Percent Ash: \_\_\_\_\_

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb \_\_\_\_\_ BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

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

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

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ ft.  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM Gas Exit Temperature: \_\_\_\_\_ °F.  
 Water Vapor Content: \_\_\_\_\_ % Velocity: \_\_\_\_\_ FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated	MATERIAL TO BE PLACED IN FURNACE IS ELECTRIC MOTOR WINDINGS FOR REMOVAL OF THE VARNISH COATING.						
Uncontrolled (lbs/hr)							

Description of Waste Electric motors (to remove varnish on windings)  
 Total Weight Incinerated (lbs/hr) negligible Design Capacity (lbs/hr) 15  
 Approximate Number of Hours of Operation per day 24 day/wk 7 wks/yr. 52  
 Manufacturer Pollution Control Products Co., Dallas, Texas  
 Date Constructed \_\_\_\_\_ Model No. IGG 88

	Volume (ft) <sup>3</sup> (approx.)	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber	83 ft. <sup>3</sup>	negligible	nat. gas	140,000	800F min.
Secondary Chamber	7 ft. <sup>3</sup>	negligible	nat. gas	160,000	1,400F min.

Stack Height: 20 ft. above grade Stack Diameter: 14" OD, 10" ID Stack Temp. 1,400F  
 Gas Flow Rate: 169 (@1,400°F) ACFM 40 (approx.) DSCFM\* Velocity: 13 (approx.) 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.):

Any ash residue from the nylon would be disposed of in compliance with solid waste and RCRA regulations.

\_\_\_\_\_

\_\_\_\_\_

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

NOT APPLICABLE

**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

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:\*

4. Capital Costs:

\*Explain method of determining



- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.    b. Diameter: ft.
- c. Flow Rate: ACFM    d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Devices: b. Operating Principles:
- c. Efficiency:<sup>1</sup> d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:<sup>2</sup> 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:<sup>1</sup> d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:<sup>2</sup> h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- 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:<sup>1</sup>
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:<sup>2</sup>
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

NOT APPLICABLE

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

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

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent?  Yes  No
- b. Was instrumentation calibrated in accordance with Department procedures?  
 Yes  No  Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
- 2. Surface data obtained from (location) \_\_\_\_\_
- 3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
- 4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

- 1. \_\_\_\_\_ Modified? If yes, attach description.
- 2. \_\_\_\_\_ Modified? If yes, attach description.
- 3. \_\_\_\_\_ Modified? If yes, attach description.
- 4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sup>2</sup>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

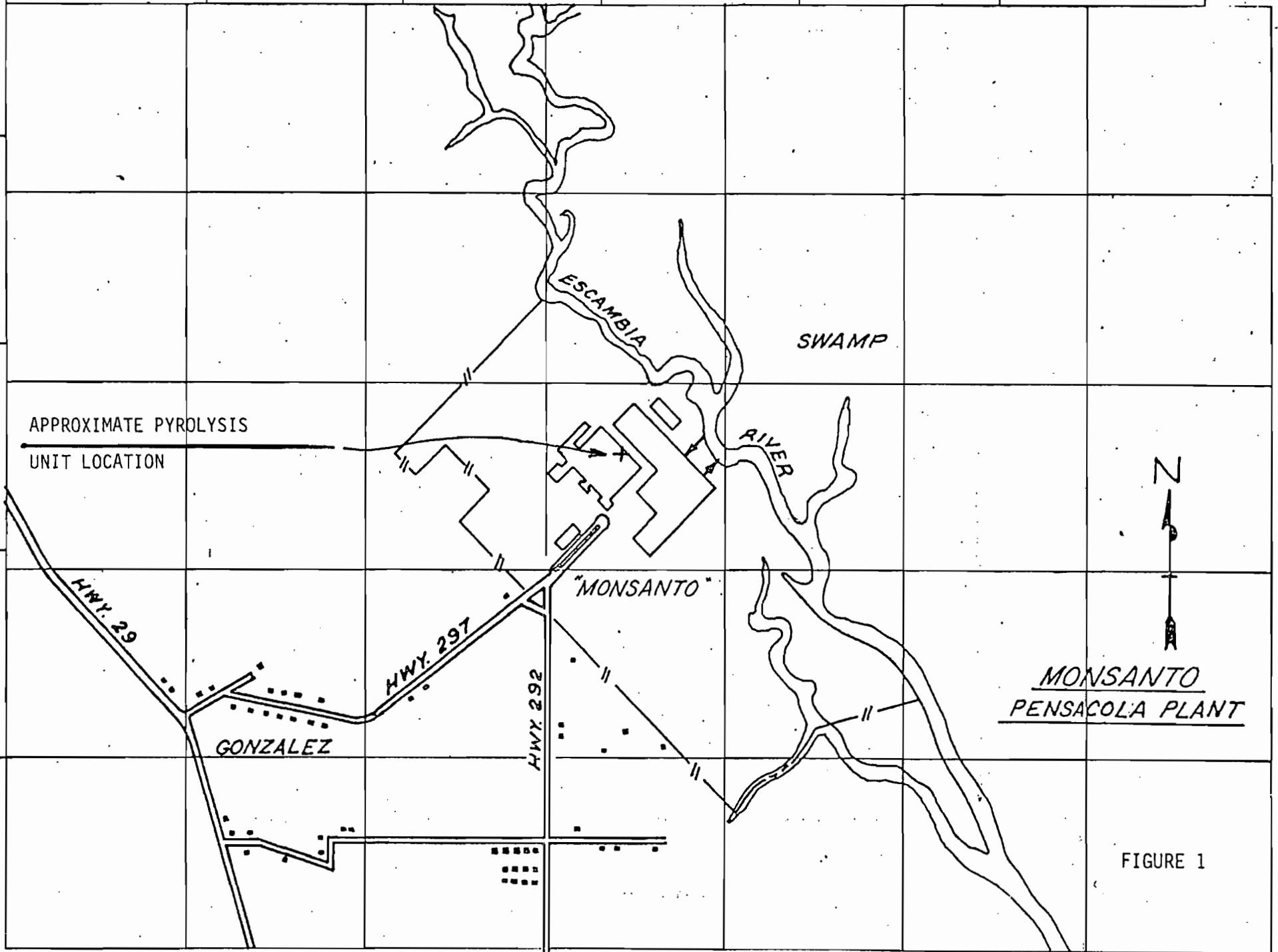
87°18'

87°15'

87°12'

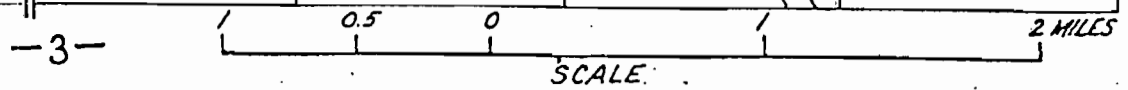
30°37'

30°34'



MONSANTO  
PENSACOLA PLANT

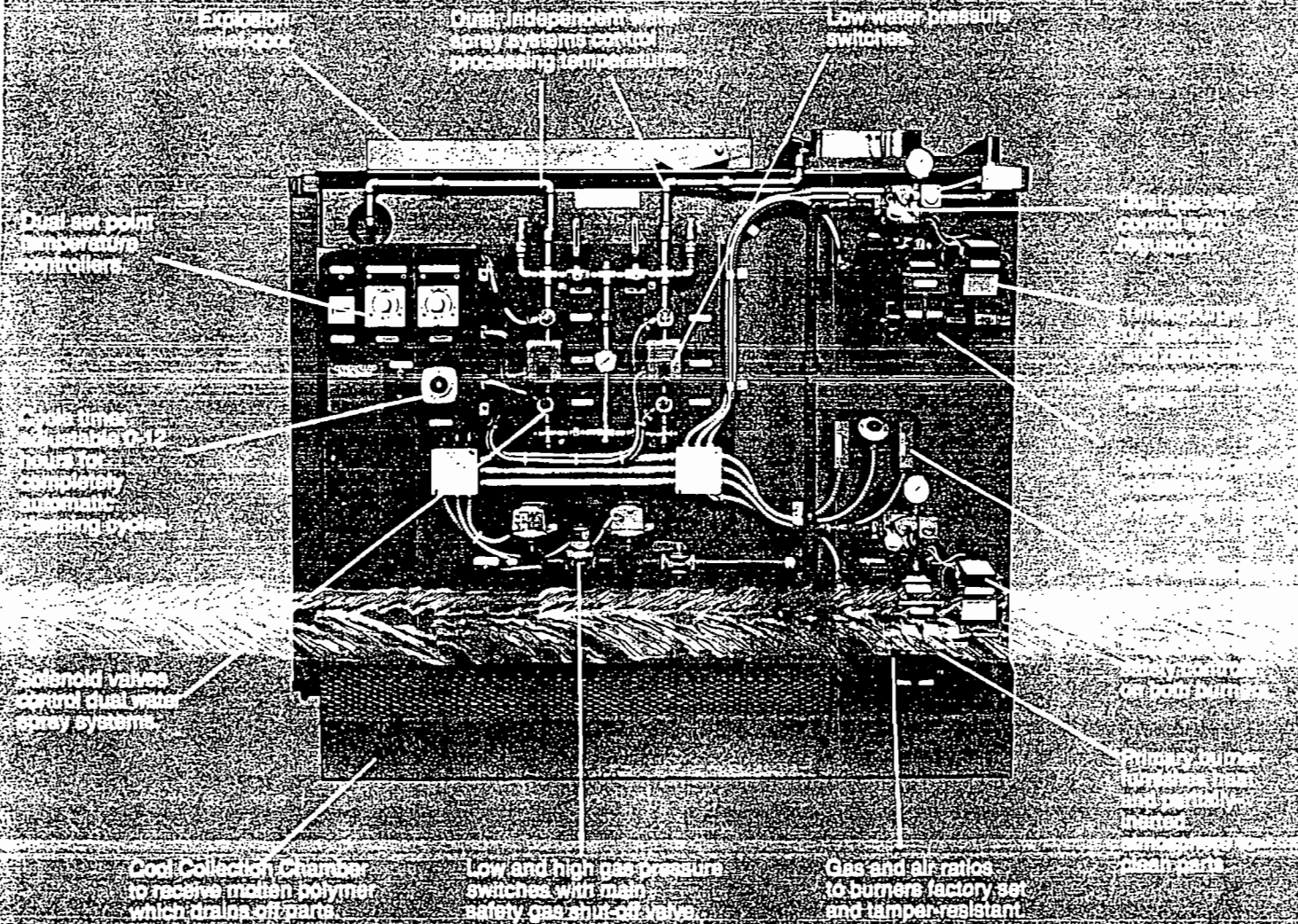
FIGURE 1



# Special Design and Safety features of POLLUTION CONTROL PRODUCTS CO.

## CONTROLLED<sup>TM</sup> PYROLYSIS

### CLEANING FURNACES



#### OTHER IMPORTANT SAFETY FEATURES

- Door switch prevents start-up unless doors are open.
- Automatic safety cool-down with loss of primary burner.
- Warning light system to detect water spray nozzle clogging.
- DIAGNOSTIC PANEL aids in trouble shooting and indicates furnace status.
- Water spray pulse timer aids in smooth control of processing temperatures.

# SPECIFICATIONS AND DATA

**CABINET:** Heavy-gauge sheet steel supported by structural steel angles and channels. All-welded construction with sealed seams to prevent air leakage gives maximum fuel economy and safety.

**FLOOR:** Hard castable refractory, 3" thick, reinforced with structural steel channels.

**DOORS:** Equipped with cam-type lock assemblies, tad-pole sealing gaskets, and stay-open hooks. Doors open slightly over 90°. Door switch ensures door(s) are open during timed purge before burners are ignited.

**EXPLOSION RELIEF:** Required on all furnaces and ovens. Unique gravity-sealed top relief automatically opens to relieve excess pressure, then closes, preventing air from reaching combustible material. Conventional spring-latched front doors or blow-out panels used for explosion relief do not provide this important safety feature because, once opened, such doors or panels do not close to keep out air, and material inside will burn freely.

**INSULATION:** Walls are covered with 4" of a two-layered light-weight ceramic fiber blanket insulation anchored on stainless steel pins, stainless wire mesh, and stainless locking washers. Contains no asbestos and has superior properties to asbestos or fiberglass. Hot face insulation rated at 2300°F (1260°C) and one inch is equivalent to 9" of conventional refractory or firebrick with one-tenth the weight, making these furnaces much lighter in weight and much faster to heat with less fuel. Ceilings and doors are covered with 3" of the two layered insulation. Special outer sheet metal panels with air insulating construction reduce the outer wall temperatures of the sides and back to a minimum.

**VENT STACK:** Made in 36" long light-weight sections for easy erection. Galvanized metal exterior lined with high-temperature ceramic fiber in hard form. Sections snap together. Adjustable-pitch roof flashing, storm collar, and rain cap furnished with stack.

**FUELS:** Natural gas, propane gas, or #2 fuel oil. Minimum input 250,000 BTU/hr. to maximum 375,000 BTU/hr. Gas pressure required 7 inches water column (.18 meter). Gas train equipped with approved low and high gas pressure switches, electric main safety gas shut-off valve, and test cock.

**ELECTRICAL SERVICE:** 110-125 volts, 50-60 hertz, single-phase, 7 ampere draw. Optional transformers available for other voltages.

**WATER SUPPLY:** Minimum pressure 40 psi (2 atmos.); maximum 100 psi (6 atmos.) for water injection system. Minimum flow rate 0.3 gpm (1.2 liter/min.) to 0.9 gpm (3.6 liter/min.). Water spray injection is intermittent, on demand from temperature controllers, not continuous.

**NORMAL CLEANING TIME:** Typically 2-4 hours plus cooling time. Actual cleaning times vary with the amount of metal and polymer loaded to furnace. Time adjustable 0-12 hours.

**NORMAL CLEANING TEMPERATURE:** 800-900°F (427-482°C). Two dual-set point temperature controllers, range 0-2000°F (-18°C to 1093°C) with Fahrenheit and Celsius scales.

**POLLUTION STANDARDS:** Meets latest E.P.A. Federal Standards for Incinerators. ➤

**SAFETY AND HEALTH STANDARDS:** Meets latest O.S.H.A. Federal Standards.

**INSURANCE STANDARDS:** Meets most state and local codes.

MODEL NO.	OUTSIDE DIMENSIONS						DOOR OPENING				INSIDE DEPTH FRONT TO BACK				CART INSIDE DIMENSIONS						APPROX. SHIP. WT.	
	WIDTH		DEPTH		HEIGHT		WIDTH		HEIGHT		WIDTH		DEPTH		HEIGHT							
	IN.	M.	IN.	M.	IN.	M.	IN.	M.	IN.	M.	IN.	M.	IN.	M.	IN.	M.	IN.	M.	LBS	KGS		
IGG 27	45	1.14	65	1.65	52	1.32	34	0.86	36	0.91	36	0.91	25	0.64	32	0.82	28	0.71	1960	890		
IGG 52	51	1.30	71	1.80	65	1.66	40	1.02	45	1.14	48	1.22	31	0.79	45	1.14	32	0.82	2340	1061		
IGG 88	57	1.45	83	2.11	73	1.85	46	1.17	60	1.52	52	1.32	37	0.94	48	1.22	36	0.91	3770	1710		
IGG 150	69	1.75	95	2.41	85	2.16	58	1.47	72	1.83	64	1.63	49	1.24	60	1.52	48	1.22	4960	2250		
IGG 260	75	1.91	119	3.02	98	2.49	64	1.63	84	2.13	88	2.24	55	1.40	84	2.13	60	1.52	6670	3025		
IGG 290	81	2.06	119	3.02	98	2.49	70	1.78	84	2.13	88	2.24	61	1.55	84	2.13	60	1.52	6870	3116		
IGG 340	93	2.36	119	3.02	98	2.49	82	2.08	84	2.13	88	2.24	73	1.85	84	2.13	60	1.52	7190	3261		

manufactured by

**P**OLLUTION  
**C**ONTROL  
**P**RODUCTS CO.

2677 FREWOOD DRIVE  
DALLAS, TEXAS 75220  
214-358-1539

79 WHYTELEAFE ROAD  
CATERHAM, SURREY CR3 5EJ

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4,000\*

# Advantages of **CONTROLLED PYROLYSIS**<sup>TM</sup> **CLEANING FURNACES**

U. S. PATENT 4,270,886

## ELIMINATE DANGEROUS CHEMICAL CLEANING METHODS.

Do away with dangerous chemical cleaning agents such as acid or caustic baths and flammable, toxic organic solvents. Costly disposal problems associated with chemical or solvent cleaning methods are eliminated. No need for expensive fume control equipment and costly solvent reclaiming systems.

## SAVE TIME AND MONEY.

The cleaning process is completely automated and essentially labor free. Once the furnace is loaded and the cleaning cycle started, the unit can be left unattended as the polymeric contaminants are removed. Parts come out clean and ready for use with a minimum of preparation. Cost savings will pay for the Cleaning Furnace in a short time and continue to pay dividends year after year.

## PREVENT PART DAMAGE FROM ABRASION OR DISTORTION.

Mechanical damage caused when parts are manually cleaned with scrapers, wire brushes, drills, or blow torches is eliminated. Close control of furnace temperature prevents damage to parts. In specialized instances, even delicate laboratory glassware has been successfully cleaned in these units.

## REMOVE LARGE AMOUNTS OF PLASTICS.

For plastics which will melt and flow during cleaning, a major portion of the plastic drains out of the heated furnace interior into a cool collection chamber where it solidifies and can be easily removed. This special feature can substantially reduce cleaning times for parts containing large amounts of plastic, increasing productivity and reducing costs. Capacity of the collection chamber is approximately 150 pounds.

## LOW OPERATING COSTS.

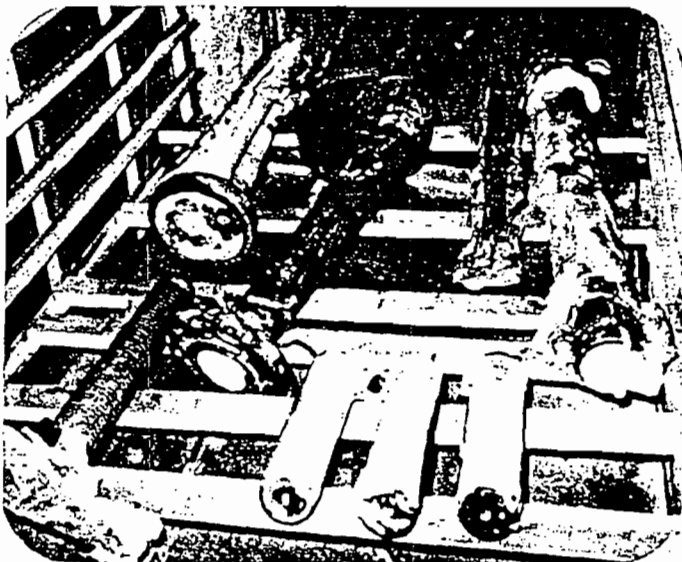
Extremely light-weight "soft" high-temperature ceramic fiber insulation and other design features allow use of small burners with total gas usage (both burners) of only 250,000 to 375,000 BTU/hr. This energy usage is very economical and includes complete pollution control! Uses natural gas, propane gas, or #2 fuel oil.

## LOW INITIAL COST. LOW INSTALLATION COST.

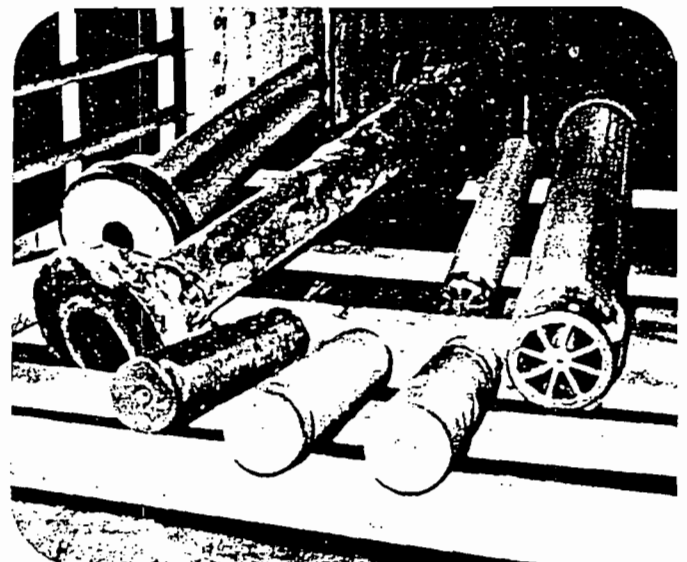
Pollution control equipment is an integral part of the furnace design and included in the initial low cost. Furnace is completely wired, piped, and fully tested at the factory to reduce installation cost to a minimum. Virtually no accessories to purchase.

## CLEANING PROCESS COMPLIES WITH THE MOST STRINGENT ENVIRONMENTAL PROTECTION REGULATIONS.

High-efficiency direct-flame incineration of the pyrolysis smoke and gases generated during cleaning assures compliance with strict environmental regulations.



**BEFORE**



**AFTER**



# POLLUTION CONTROL TECHNOLOGY

INTRODUCES A NEW

**CONTROLLED  
PYROLYSIS**

™

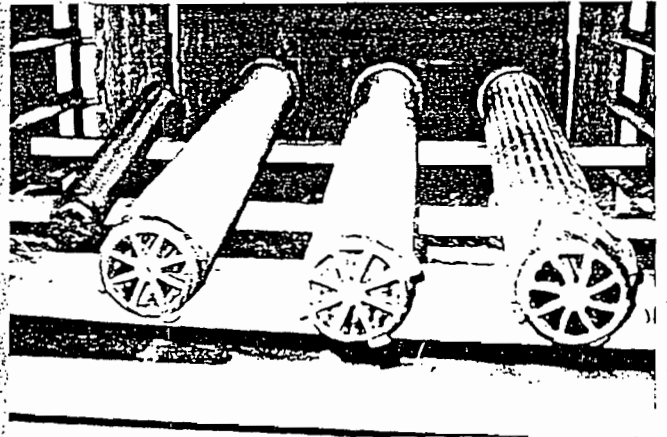
## **CLEANING FURNACE**

FOR THE

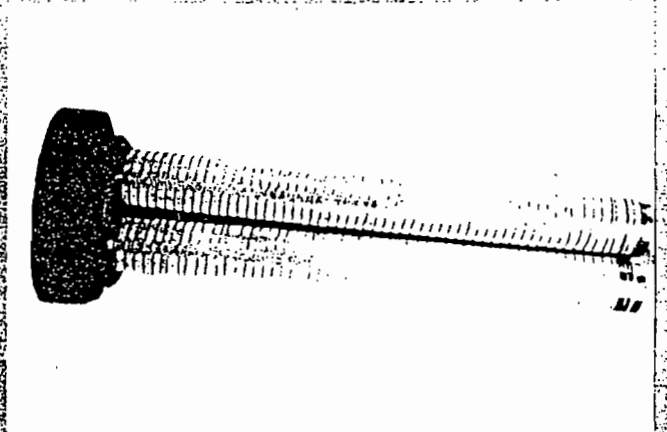
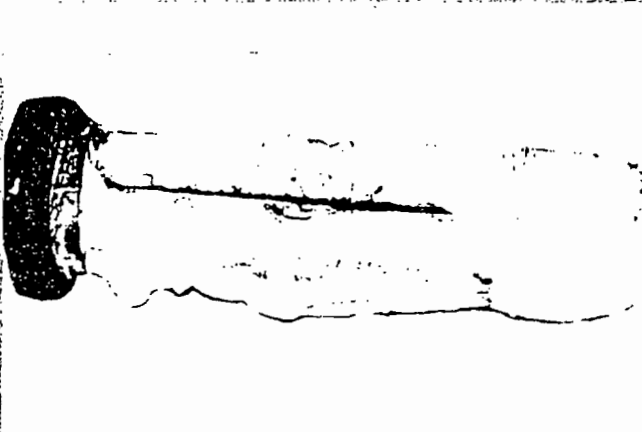
DESIGNED TO SAFELY REMOVE PLASTICS, WAXES, RESINS, HOT MELT ADHESIVES, TARS, CARBONIZED RESIDUES, AND OTHER ORGANIC MATERIALS FROM METAL PARTS LEAVING THEM CLEAN AND READY FOR REUSE. . . IDEAL FOR CLEANING A WIDE VARIETY OF METAL PARTS SUCH AS EXTRUDER HARDWARE, DIES, FILTERS, NOZZLES, POLYMER MELT PUMPS, SCREWS, SCREENS, METAL OR CERAMIC CATALYSTS, PRODUCTION PIPING. . . POLLUTION-FREE CLEANING METHOD USES HEAT TO REMOVE THERMALLY-DEGRADABLE PLASTICS, COATINGS, OR OTHER ORGANIC MATERIAL FROM METAL PARTS WITHOUT AFFECTING THE PARENT METAL . . .



**BEFORE**



**AFTER**



**Clean your plastics extruder hardware  
and other polymer or adhesive produc-  
tion equipment the easy way with a**

**CONTROLLED  
PYROLYSIS™**

**CLEANING FURNACE**

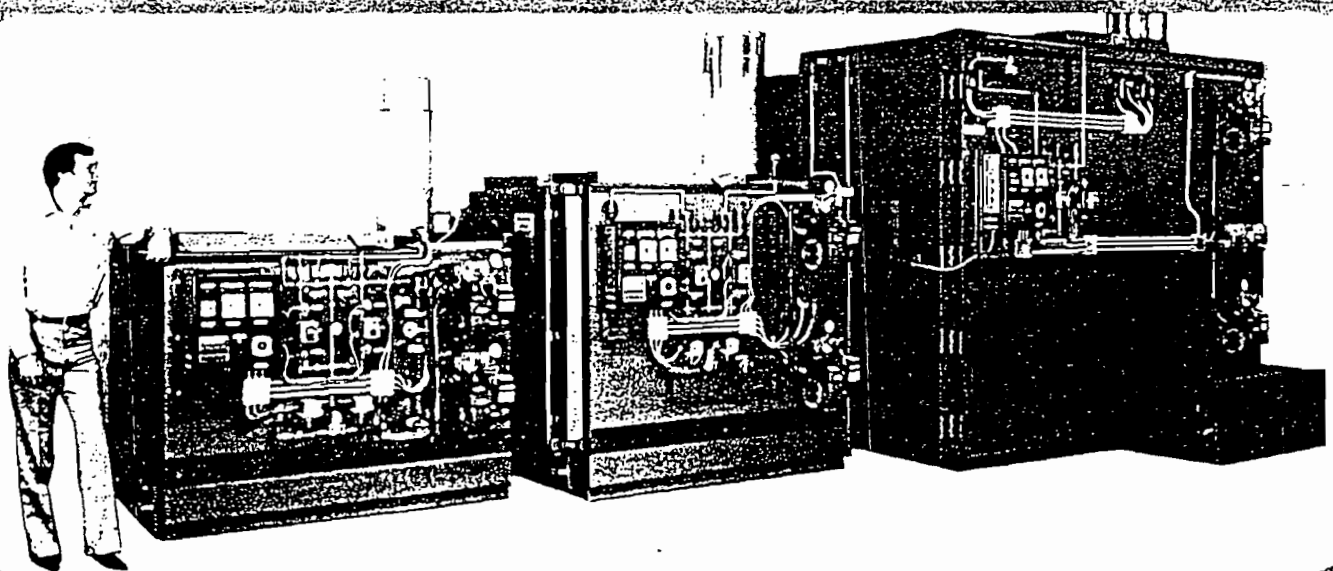
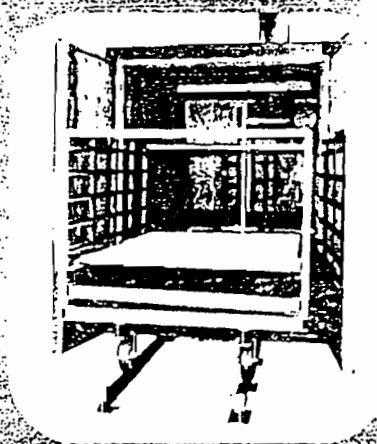
THIS FURNACE REMOVES PLASTICS AND COATINGS OF CONVENTIONAL HYDROCARBONS FROM METAL PARTS BY THERMAL PYROLYSIS (CLEANING WITH HEAT). THE PARTS ARE HEATED TO 800-900°F (427-482°C) IN A OXYGEN-DEFICIENT ATMOSPHERE AND THE PLASTICS ARE DECOMPOSED TO VOLATILE SMOKE. THE SMOKE PASSES THROUGH A COMBUSTION CHAMBER AND IS RAISED TO 1400°F (760°C) FOR A MINIMUM OF ONE-HALF SECOND WITH SUFFICIENT AIR TO COMPLETELY BURN IT BEFORE VENTING TO THE ATMOSPHERE. THE DISCHARGED EFFLUENT CONSISTS PRIMARILY OF CARBON DIOXIDE AND WATER VAPOR WHICH ARE INVISIBLE, ODORLESS AND HARMLESS.

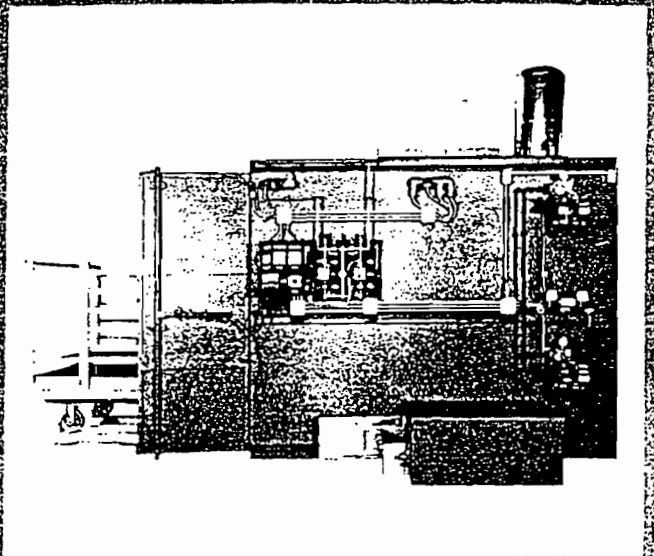
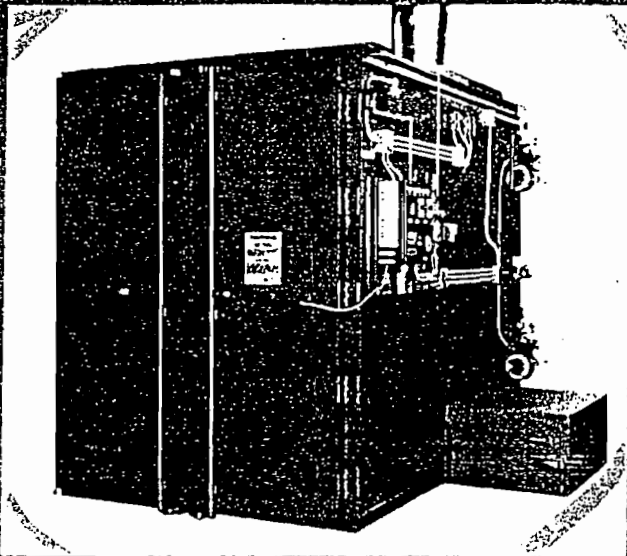
PLASTICS WHICH WILL MELT AND FLOW DURING CLEANING DRAIN FROM THE PARTS INTO A COOL COLLECTION CHAMBER WHERE THE PLASTIC SOLIDIFIES AND CAN BE EASILY REMOVED. THIS FEATURE ALLOWS SIGNIFICANTLY SHORTER CLEANING TIMES FOR METAL PARTS CONTAMINATED WITH RELATIVELY LARGE AMOUNTS OF PLASTIC.

**INTERIOR VOLUMES**

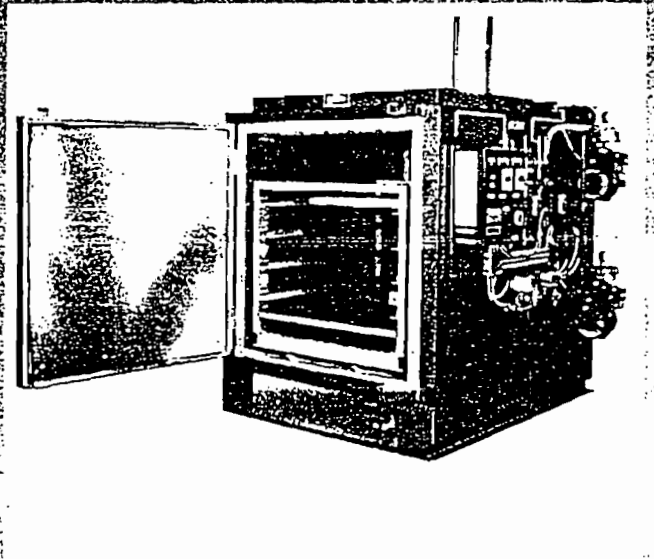
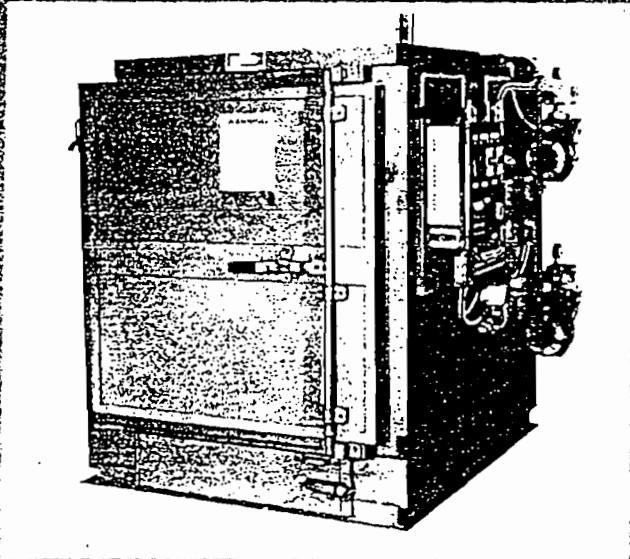
**27 to 340 CUBIC FEET**

Available in a wide range of sizes. Seven standard models with interior dimensions 3' wide x 3' high x 3' deep up to 7' x 7' x 7'. Custom sizes also available. Heavy duty carts are designed to hold a variety of parts and rolls outside the furnace on removable tracks for easy loading and unloading.



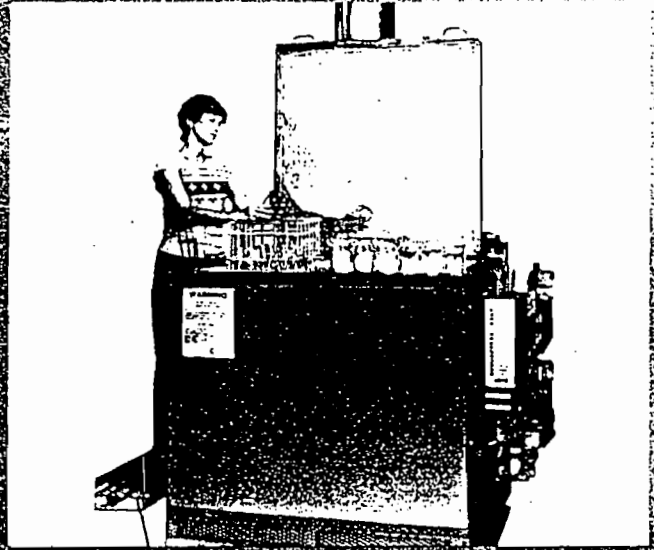
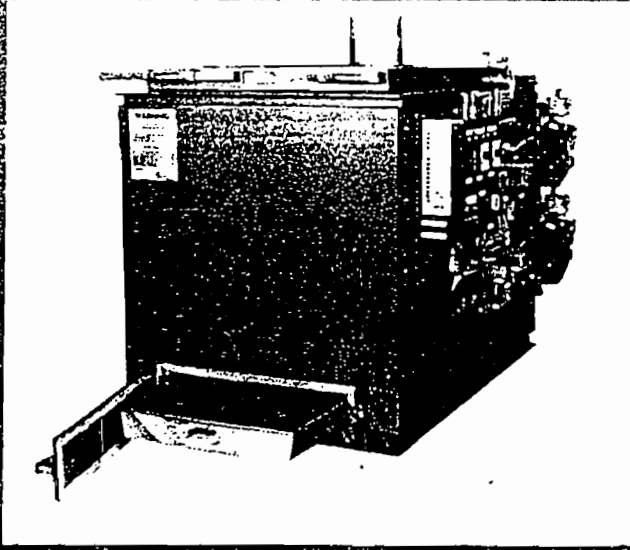


IGG-88, 150, 260, 290, and 340 have collection chambers on side. Carts roll out on removable tracks for easy loading/unloading. IGG-260 shown.



Front loading IGG-52 has collection chamber under furnace

Cart rolls out on removable tracks. (not shown)



IGG-27 is top loading only and has collection chamber under furnace. Inert track holds bars