

Check Sheet

Company Name: Monanto Chemical Company
Permit Number: AC17-148294
PSD Number: _____
Permit Engineer: _____

Application:

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

Cross References:

-
-
-

Intent:

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

Sand blasting

Correspondence with:

- EPA
- Park Services
- Other
- 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. 2. Restricted Delivery
 †(Extra charge)† †(Extra charge)†

3. Article Addressed to: Mr. W. J. Board Monsanto Company Post Office Box 12830 Pensacola, FL 32575	4. Article Number P 274 007 456
	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
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X	8. Addressee's Address (and fee paid if requested) 
6. Signature — Agent X <i>Bill Henning</i>	
7. Date of Delivery	

PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

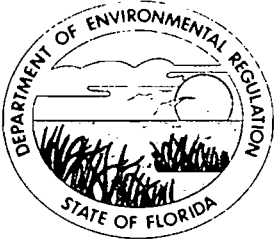
P 274 007 456

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

★ U.S.G.P.O. 1985-480-794

Sent to Mr. W. J. Board, Monsanto Co.	
Street and No. P.O. Box 12830	
P.O., State and ZIP Code Pensacola, FL 32575	
Postage	S
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	S
Postmark or Date Permit: AC 17-148294 Mailed: 9-21-88	

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

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

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

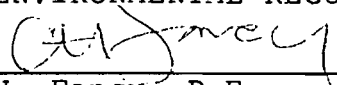
September 21, 1988

Enclosed is permit No. AC 17-148294, for Monsanto Company to construct an abrasive blast facility to be located in Pensacola, 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.

Deputy Chief

Bureau of Air Quality Management

Copy furnished to:

B. McLeod, P.E.

J. Preece, NW Dist.

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 September 21, 1988.

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.

Martha Jane Wise September 21, 1988
Clerk Date

Final Determination

Monsanto Chemical Company
Escambia County

Abrasive Blast Facility
AC 17-148294

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

September 19, 1988

Final Determination

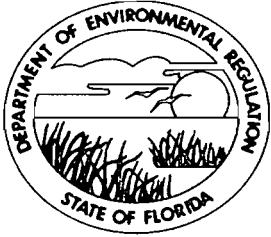
Monsanto Chemical Company's application to construct an abrasive blast facility in Pensacola, Escambia County, Florida, has been reviewed by the Bureau of Air Quality Management.

Public Notice of the Department's Intent to Issue the construction permit was published in the Pensacola News Journal on July 31, 1988, in Pensacola, Florida.

Copies of the Preliminary Determination have been available for public inspection at the Department's Bureau of Air Quality Management in Tallahassee and the DER Northwest District office in Pensacola.

No comments were received during the public notice period.

The final action of the Department will be to issue the permit as noticed during the public comment period.



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

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

Permit Number: AC 17-148294
Expiration Date: November 30, 1990
County: Escambia
Latitude/Longitude: 30° 35' 45"N
87° 15' 05"W
Project: Abrasive Blast Facility

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

For the construction of an Abrasive Blast Facility. Emissions of particulate matter (PM) from this process are controlled by a Baghouse, Clemco Model 5040. This facility is located in Pensacola, Escambia County, Florida.

Construction shall be in accordance with the permit application and plans, documents, and reference material submitted unless otherwise stated in the Preliminary Determination and Technical Evaluation or the General and Specific Conditions herein.

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on April 13, 1988.
2. Department's letter dated May 12, 1988.
3. Monsanto Chemical Company's letter dated May 18, 1988.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The abrasive blast facility is allowed to operate continuously (8760 hours per year).
2. Particulate matter (PM) emissions from this facility shall not exceed 4.9 lbs per hr and 21.5 tons per year.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

SPECIFIC CONDITIONS:

3. Compliance with the PM emission limiting standard shall be determined by performance tests conducted in accordance with the provisions of the EPA Reference Method in Appendix A of 40 CFR 60, except as provided under 40 CFR 60.8(b) as follows:

- a. Method 1 - Sample and Velocity Traverses
- b. Method 2 - Volumetric Flow Rate
- c. Method 3 - Gas Analysis
- d. Method 5 - Determination of Particulate Matter Emissions from Stationary Sources

4. Test results will be the average of three (3) valid runs. The Department's Northwest District office shall be notified at least 15 days in advance of the compliance tests. The tests will be conducted within 90 to 100% of permitted capacity.

5. Sampling procedures used to determine compliance shall be as specified in Rule 17-2.700, Stationary Point Source Emissions Test Procedures.

6. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit, (Rule 17-2, F.A.C.)

7. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, compliance test results and Certificate of Completion, to the Department's Northwest District Office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate (Rules 17-2 and 17-4, F.A.C.).

8. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application (Rule 17-4, F.A.C.).

PERMITTEE:
Monsanto Chemical Company

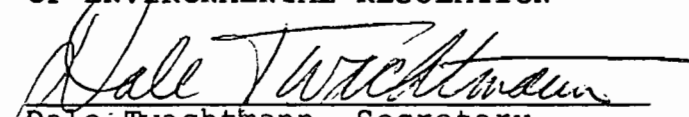
Permit Number: AC 17-148294
Expiration Date: November 30, 1990

SPECIFIC CONDITIONS:

9. Upon obtaining a permit to operate, the permittee will be required to submit annual reports on the actual operating rates and emissions from the facility. Annual reports shall be sent to the Department's Northwest District in Pensacola.

Issued this 20 day of Sept.,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtman, Secretary



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: Dale Twachtmann

for FROM: Steve Smallwood *Steve Smallwood*

DATE: September 19, 1988

SUBJ: Approval of Monsanto Chemical Company
Air Construction Permit Number: AC 17-148294

Attached for your approval and signature is a permit prepared by Central Air Permitting for Monsanto Chemical Company to construct an abrasive blast facility in Pensacola, Escambia County, Florida.

No comments were received during the public notice period. Day 90, after which this permit will be issued by default, is September 21, 1988

I recommend your approval and signature.

SS/TH/s

attachments

file copy

*Express mail B 21524347
8-16-88
Gonzalez, FL*

Monsanto

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

RECEIVED
AUG 17 1988
DER-BAQM

VIA OVERNIGHT MAIL

August 16, 1988

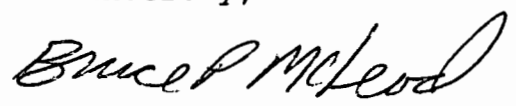
Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8141

Dear Mr. Fancy:

Attached is proof of publication of the public notice for construction permit AC17-148294, Abrasive Blast Facility.

Please issue this construction permit as soon as possible.

Sincerely,



Bruce P. McLeod
Senior Specialist
Environmental Control

Attachment

cc: J. G. Wiley, Monsanto, Pensacola

*Copies: Teresa Heron
Jack Price*

RECEIVED **PENSACOLA News Journal**
AUG 17 1988

DER - BAQM PUBLISHED DAILY
PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,
County of Escambia.

Before the undersigned authority personally appeared

J. Diane Deal

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

in the _____ Court,

was published in said newspaper in the issues of

July 31, 1988

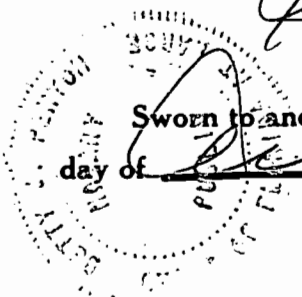
Affiant further say that the said The Pensacola News Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida, each day and has been entered as second class mail matter at the 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.

J. Diane Deal

Sworn to and subscribed before me this 15th

day of August, A.D., 1988

Tracy J. Fenton
NOTARY PUBLIC.



My Commission Expires October 26, 1991

LEGAL NOTICE LEGAL NOTICE

State of Florida
Department of
Environmental
Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Monsanto Chemical Company to construct an abrasive blast facility to be located in Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administration hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for Administrative Code, at

least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway Tallahassee, Florida 32301. If no hearing officer has been assigned the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such persons has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

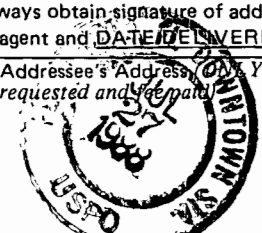
Dept. of Environmental Regulation
Northwest District Office
160 Governmental Center
Pensacola, Florida
32501-5794

Any person may send written comments on the proposed action to Mr. Bill Thomas 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.

Legal No. 34770 It
July 31, 1988

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)† †(Extra charge)†

3. Article Addressed to: Mr. W. J. Board General Supt., Governmental Affairs Environmental Health & Safety Monsanto Company P.O. Box 12830 Pensacola, FL 32575	4. Article Number P 702 177 457 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 Always obtain signature of addressee or agent and DATE DELIVERED .
5. Signature - Addressee X	
6. Signature - Agent X <i>Bob Putney</i>	
7. Date of Delivery	
8. Addressee's Address, <i>ONLY if requested and fee paid</i>	

PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 702 177 457
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

PS Form 3800, June 1985

Sent to Mr. W. J. Board, Monsanto Co.	
Street and No. P.O. Box 12830	
P.O., State and ZIP Code Pensacola, FL 32575	
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 Mailed: 7-26-88 Permit: AC 17-148294	



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

July 25, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. W. J. Board, General Supt.
Governmental Affairs/Environmental
Health and Safety
Post Office Box 12830
Pensacola, Florida 32575

Dear Mr. Board:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Monsanto Chemical Company to construct an abrasive blast facility to be located at the company chemical complex in Pensacola, Escambia County, Florida.

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

Sincerely,

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

CHF/th

Attachments

cc: Jack Preece, NW District
Bruce McLeod, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

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

DER File No. AC 17-148294

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a 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 Chemical Company, applied on April 13, 1988, to the Department of Environmental Regulation for a permit to construct an abrasive blast facility to be located in Pensacola, Escambia County, Florida.

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

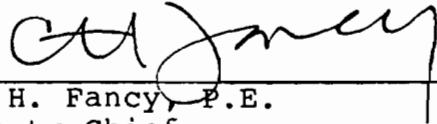
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. 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 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. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. 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, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Jack Preece, NW District
Bruce McLeod, P.E.

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

28-5.15 Requests for Formal and Informal Proceedings

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

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 July 26, 1988.

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.

Martha Jane Wise July 26, 1988
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Monsanto Chemical Company to construct an abrasive blast facility to be located in Pensacola, Escambia County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794

Any person may send written comments on the proposed action to Mr. Bill Thomas 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 Chemical Company
Abrasive Blast Facility
Escambia County

Permit No. AC 17-148294
APIS No. 10 PEN 170040

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

July 20, 1988

I. NAME AND ADDRESS OF APPLICANT

Monsanto Chemical Company
Post Office Box 12830
Pensacola, Florida 32575

II. REVIEWING AND PROCESSING SCHEDULE

Date of Receipt of Application: April 13, 1988

Completeness Review (30 days): Department's incompleteness letter dated May 12, 1988

Response to Incompleteness letter: Monsanto's letter dated May 18, 1988, received on May 20, 1988.

Application completeness date: May 20, 1988.

III. FACILITY INFORMATION

III.1 Facility Location

The source is located at the intersection of State Road 292 & 297 in Pensacola, Escambia County, Florida. The latitude and longitude coordinates are 30°35'45"N and 87°15'05"W.

III.2 Standard Industrial Classification Code (SIC)

This facility is classified as follows:

Major Group No. 28 - Chemicals and Allied Products
Industry No. 2824 - Manmade Organic Fibers,
Except Cellulosic

III.3 Facility Category

Monsanto Chemical Company is a major emitting facility. This facility category (chemical process plant) is on the list of the 28 Major Facility Category. The proposed project, abrasive blast facility, will increase actual particulate matter emissions by 21.5 tons per year.

IV. PROJECT DESCRIPTION

This project is comprised of essentially a metal building, in which abrasive blasting of equipment prior to painting is conducted. The primary purpose of the enclosure is to contain the abrasive blasting grit for recovery and reuse. The purpose of the exhaust is to provide air movement within the enclosure to allow for operator visibility. The air discharged from the blowers goes to bag filter which controls particulate emissions.

V. RULE APPLICABILITY

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

This facility site is in an area Escambia County designated attainment for all pollutants in accordance with Rule 17-2.420, Florida Administrative Code (FAC) except for sulfur dioxide. The area is unclassified for sulfur dioxide (Rule 17-2.430(2), FAC).

Monsanto Chemical Company is classified as a major facility. The existing facility has the potential to emit greater than 100 tons per year of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic compounds (VOC), and carbon monoxide (CO).

This project, Abrasive Blast Facility, is exempt from the New Source Review Requirements of the Prevention of Significant Deterioration, Rule 17-2.500, because the net emission increase of PM is 21.5 tons per year.

This project shall be permitted under Rule 17-2.520, Sources not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. The proposed source shall comply with Rules 17-2.700, Stationary Point Sources Emissions Test Procedures, 17-2.620, General Pollutant Emission Limiting Standards, 17-2.240, Circumvention and 17-2.250, Excess Emissions.

VI. EMISSION SUMMARY

VI.1 Emission Limitations

The operation of the blast abrading facility will produce emissions of particulate matter. The permitted emissions are 4.9 lbs/hr and 21.5 tons/year. The permitted emissions are in compliance with all applicable requirements of Chapter 17-2, FAC.

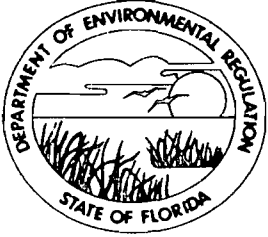
VI.2 Air Quality Analysis

From a technical review of the application, the Department has determined that the installation and operation of this source will not have an adverse impact on Florida's ambient air quality.

CONCLUSION

Based on the review of the data submitted by Monsanto Chemical Company, The Florida Department of Environmental

Regulation (FDER) concludes that compliance with all applicable state air quality regulations will be achieved by this source provided certain specific conditions are met. The impact of operating the abrasive blast facility will not cause or contribute to a violation of any ambient air quality standard.



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

Permit Number: AC 17-148294
Expiration Date: November 30, 1990
County: Escambia
Latitude/Longitude: 30° 35' 45"N
87° 15' 05"W
Project: Abrasive Blast Facility

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

For the construction of an Abrasive Blast Facility. Emissions of particulate matter (PM) from this process are controlled by a Baghouse, Clemco Model 5040. This facility is located in Pensacola, Escambia County, Florida.

Construction shall be in accordance with the permit application and plans, documents, and reference material submitted unless otherwise stated in the Preliminary Determination and Technical Evaluation or the General and Specific Conditions herein.

Attachments:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on April 13, 1988.
2. Department's letter dated May 12, 1988.
3. Monsanto Chemical Company's letter dated May 18, 1988.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The abrasive blast facility is allowed to operate continuously (8760 hours per year).
2. Particulate matter (PM) emissions from this facility shall not exceed 4.9 lbs per hr and 21.5 tons per year.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

SPECIFIC CONDITIONS:

3. Compliance with the PM emission limit standard shall be determined by performance tests conducted in accordance with the provisions of reference method in Appendix A of 40 CFR 60, except as provided under 40 CFR 60.8(b) as follows:

- a. Method 1 - Sample and Velocity Traverses
- b. Method 2 - Volumetric Flow Rate
- c. Method 3 - Gas Analysis
- d. Method 5 - Determination of Particulate Matter Emissions from Stationary Sources

4. Tests results will be the average of three (3) valid runs. The Department's Northwest District office shall be notified 15 days in advance of the compliance tests. The tests will be conducted within 90 to 100% of permitted capacity.

5. Sampling procedures used to determine compliance shall be as specified in Rule 17-2.700, Stationary Point Source Emissions Test Procedures.

6. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit, (Rule 17-2, FAC).

7. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District Office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate (Rules 17-2 and 17-4, FAC).

8. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application (Rule 17-4, FAC).

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-148294
Expiration Date: November 30, 1990

SPECIFIC CONDITIONS:

9. Upon obtaining a permit to operate, the permittee will be required to submit annual reports on the actual operating rates and emissions from the facility. Annual reports shall be sent to the Department's Northwest District in Pensacola.

Issued this _____ day of _____,
1988

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

Express mail B 215 24332

PM
5-19-88
Pensacola, FL

File Copy

Monsanto

AC 17-48294

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

RECEIVED

MAY 20 1988

DER-BAQM

VIA OVERNIGHT MAIL

May 18, 1988

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

Dear Mr. Fancy:

This letter is in response to the additional information requested in your letter to W. J. Board, May 12, 1988, regarding the Construction Permit for an Abrasive Blast Facility.

Question 1:

Explain in more detail the nature of this project.

This project is comprised of essentially a metal building, in which abrasive blasting of equipment prior to painting is conducted. The primary purpose of the enclosure is to contain the abrasive blasting grit for recovery and reuse. The purpose of the exhaust blower is to provide air movement within the enclosure to allow for operator visibility. The air discharged from the blower goes to a bag filter which controls particulate emission.

Question 2:

Has the particulate matter emissions matter from this plant increased during the last five years.

Since this abrasive blast facility is not a part of any manufacturing operations at the Pensacola plant (that is, does not belong to the same SIC code), past permitting experience with the Department has been that particulate emission increases for this construction permit are independent of other particulate matter increases from other SIC code operations. The general guidance received from Mr. Thomas of your staff was that emissions increases


1197.BPM

from other operations would not be considered contemporaneous increases for purposes of permitting unless the increases occurred as a result of changes within the same operating area or within the same SIC code classification.

No increases in particulate matter emissions from abrasive blast operations at the Pensacola plant have occurred in the last five years.

Additional guidance on the type of information needed to acceptably respond to these two additional information requests was provided by Teresa Heron on May 16, 1988. If further information is needed, call me at 904/968-8725.

Sincerely,



Bruce P. McLeod
Senior Specialist
Environmental Control

c: J. G. Wiley, Monsanto, Pensacola

Copied: Teresa Heron
Jack Price, NW } 5-20-88 (mp)
CHF/BT



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

May 12, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. J. Board
General Superintendent
Monsanto Company
Post Office Box 12830
Pensacola, Florida 32575

Dear Mr. Board:

Re: Abrasive Blast Facility, File No. AC 17-148294

Dear Mr. Board:

The Bureau of Air Quality Management (BAQM) has received your application for a permit to construct an abrasive blast facility at Monsanto's chemical complex in Escambia County, Florida.

Based on our initial review of your proposal, it has been determined that the following additional information is needed to complete your application:

- Explain in more detail the nature of this project.
- Has the particulate matter (PM) emissions from this plant increased during the last five years? If so, please quantify these emissions.

If you have any questions about the information requested, please call Teresa Heron at (904) 488-1344 or write to me at the above address.

Sincerely,

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

CF/TH/ss

cc: Jack Preece, DER
Bruce McLeod, P.E.

Monsanto

RECEIVED
DER - MAIL ROOM

1988 APR 13 PM 3:15

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

VIA OVERNIGHT MAIL

April 12, 1988

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

Dear Mr. Fancy:

Enclosed are four copies of an air pollution permit application for an Abrasive Blast facility at the Monsanto Pensacola plant.

Also included is a check for \$100 to cover the application fee. I can be reached at (904) 968-8725 if desired.

Sincerely,



Bruce P. McLeod
Senior Specialist
Environmental Control

cc: J. G. Wiley - Monsanto

Copies: J. G. Wiley

Ed Middlewart, NW Dist.

4-21-88

1031

1032.BPM

Monsanto

WORKING FUND ACCOUNT
MONSANTO COMPANY
PENSACOLA, FLORIDA

72010011

62-20
311

2318

2318

04-11-88

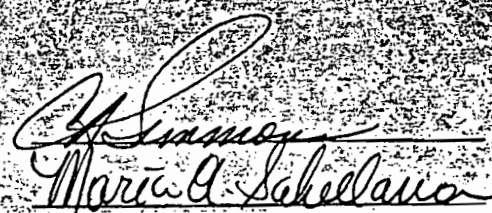
\$100.00

EXACTLY 100.00

PAY TO THE ORDER OF

DEPARTMENT OF ENVIRONMENTAL REGULATION

Citibank (Delaware)



MONSANTO COMPANY, PENSACOLA, FLORIDA

P-15

04-11-88

THE ATTACHED CHECK IS IN PAYMENT OF THE FOLLOWING:

72010011

DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMO	DATE	INVOICE NO.	AMOUNT	DEDUCTIONS & DISCOUNT	NET
Construction Permit Application fee for Abrasive Blast Facility - B. P. McLeod	04-11-88	2318	\$100.00		\$100.00

DETACH BEFORE DEPOSITING

CH 142

Senior Specialist
Environmental Control

cc: J. G. Wiley - Monsanto

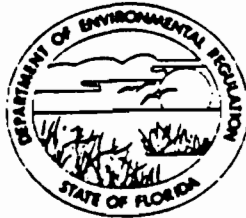
1031

1032.BPM

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED



APR 13 1988

DER-BAQM

BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

ROBERT V. KRIEGLER DISTRICT MANAGER

NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER PENSACOLA, FLORIDA 32501

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [x] New¹ [] Existing¹

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

COMPANY NAME: Monsanto 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) Abrasive Blast Facility

SOURCE LOCATION: Street Intersection State Roads 292 & 297 City Pensacola

UTM: East North (approximate) Latitude 30 . 35 , 45 "N Longitude 87 . 15 , 5 "W

APPLICANT NAME AND TITLE: W. J. Board, General Supt., Gov. Affairs/Env. Health & Safety

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., Gov. Affairs/Env. Health & Safety Name and Title (Please Type)

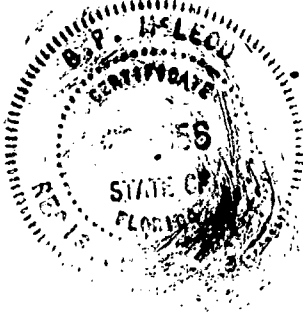
Date: 4/11/88 Telephone No. 904/968-7350

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

1 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

Bruce P. McLeod, P.E.

Name (Please Type)

Monsanto Company

Company Name (Please Type)

P. O. Box 12830, Pensacola, FL 32575

Mailing Address (Please Type)

Florida Registration No. 26956

Date: 4/11/88

Telephone No. 904/968-8725

SECTION II: GENERAL PROJECT INFORMATION

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.

Unconfined emission source of particulate matter enclosed in a building vented through a bag filter. Existing plant equipment will be utilized in this service.

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

Start of Construction Upon permit issuance Completion of Construction 18 months after permit issuance

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.)

\$35,000.00

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

None

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? | <u>no</u> |
| a. If yes, has "offset" been applied? | <u>N/A</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | <u>N/A</u> |
| c. If yes, list non-attainment pollutants. _____ | <u>N/A</u> |
| 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. | <u>no</u> |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. | <u>no</u> |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? | <u>no</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? | <u>no</u> |
| H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? | <u>no</u> |
| a. If yes, for what pollutants? _____ | <u>N/A</u> |
| 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 justification for any answer of "No" that might be considered questionable.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Abrasive grit	N/A		N/A	1

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

1. Total Process Input Rate (lbs/hr): N/A

2. Product Weight (lbs/hr): N/A

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Particulate	4.9	21.5	(see note below)	27	118	1	

See Section V, Item 2.

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)

Calculated from operating rate and applicable standard.

Emission, if source operated without control (See Section V, Item 3).

NOTE: 17-2.610(3) requires reasonable precautions to control dusting.

0.03 grains particulates is proposed as providing reasonable precautions.

SCF

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Clemco Model 5040	Particulate	97%		Typical bag filter performance

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: N/A 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.

Abrasive grit waste disposed of in sanitary landfill.

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

Stack Height: 25 ft. Stack Diameter: 2'-11 3/4 x 2'-2 1/4 ft.
 Gas Flow Rate: 19080 ACFM 19080 DSCFM Gas Exit Temperature: ambient °F.
 Water Vapor Content: ambient % Velocity: 49 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	NOT	APPL	CABLE				
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Bag filter separates abrasive grit from blasting air for reuse of grit.

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

Not Applicable

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.

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

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No Not Applicable

Contaminant	Rate or Concentration

Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

MONSANTO PENSACOLA
ABRASIVE BLAST FACILITY
CALCULATION OF ACTUAL PARTICULATE EMISSIONS

$$\frac{.031 \text{ grains}}{\text{SCF}} \times \frac{19080 \text{ SCF}}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{24 \text{ hour}}{\text{day}}$$

$$\times \frac{.06480 \text{ grams}}{1 \text{ grain}} \times \frac{1 \text{ lb}}{454 \text{ grams}} \times \frac{365 \text{ day}}{\text{year}}$$

$$\times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 21.5 \frac{\text{tons}}{\text{year}}$$

$$= 4.9 \frac{\text{lbs}}{\text{hr}}$$

MONSANTO PENSACOLA
ABRASIVE BLAST FACILITY
CALCULATION OF DISCHARGE VELOCITY

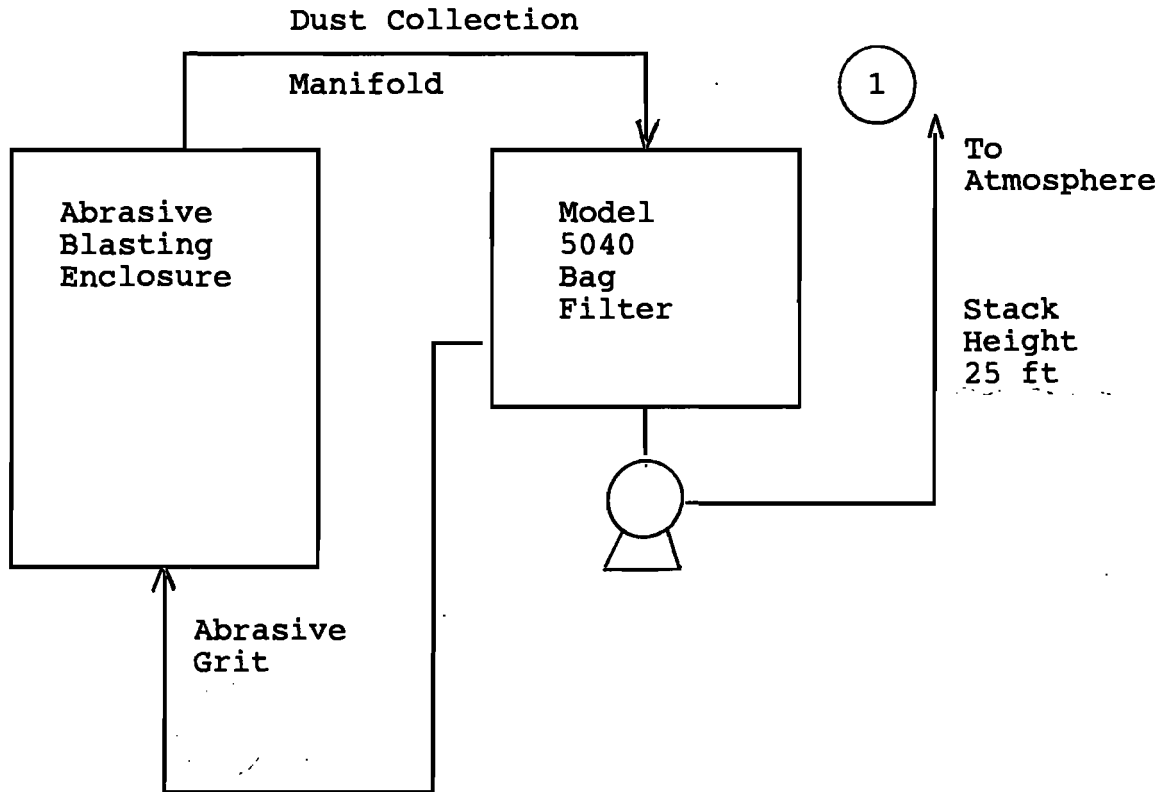
Dimensions of exhaust stack 2'11 3/4" x 2'2 1/4"

$$\text{Exhaust Area } \frac{35.75}{12} \text{ ft} \times \frac{26.25}{12} \text{ ft} = 6.52 \text{ ft}^2$$

$$\text{Discharge Velocity} = 19080 \frac{\text{ft}^3}{\text{min}} \times \frac{1 \text{ min}}{60 \text{ sec}}$$

$$\times \frac{1}{6.52 \text{ ft}^2} = 49 \frac{\text{ft}}{\text{sec}}$$

MONSANTO PENSACOLA
ABRASIVE BLAST FACILITY



MONSANTO PENSACOLA
ABRASIVE BLAST FACILITY
DESIGN DETAILS OF BAG FILTER

Cleco Model 5040

Filter Area 5040 square feet

Air Volume 19080 CFM

Cloth to Air Ratio 3.79

Bag Filter Dimensions 17'6" long x 8'0" wide x 13' high

MONSANTO PENSACOLA
 ABRASIVE BLAST FACILITY
 BASIS OF POTENTIAL DISCHARGE

Vendor Estimate = 1.1 grains particulate filter inlet loading
 ft^3

$$1.1 \frac{\text{grams}}{\text{ft}^3} \times \frac{0.06480 \text{ grams}}{1 \text{ grain}} \times \frac{1 \text{ lb}}{454 \text{ grams}} \times 19080 \frac{\text{ft}^3}{\text{min}}$$

$$\times \frac{60 \text{ min}}{\text{hr}} \times \frac{24 \text{ hr}}{\text{day}} \times \frac{365 \text{ days}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs.}}$$

x 0.15 estimated fraction of grit = 118 tons
 which is small enough to year
 become an airborne
 particulate

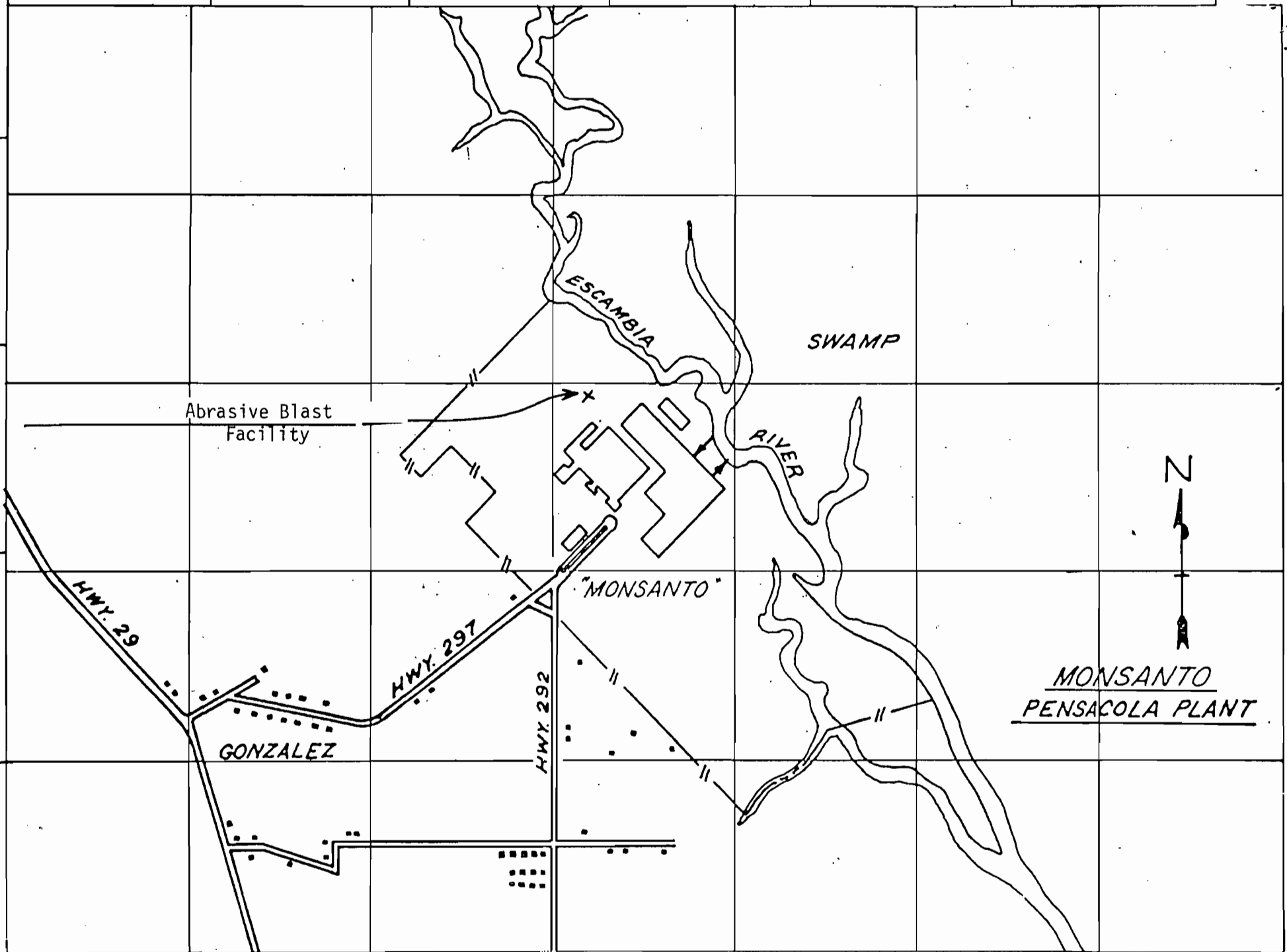
87°18'

87°15'

87°12'

30°37'

30°34'



MONSANTO
PENSACOLA PLANT

