Check Sheet

Company Name: MONSANTO CHEMICAL COMPANY
Permit Number: AC 17-087408
PSD Number: _____
Permit Engineer: _____

Application:

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

Cross References:

- ☐
- ☐
- ☐

— thermoplastic Rubber compound facility
— Limits on PM, VE and formaldehyde

Intent:

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

  Correspondence with:
  - ☐ EPA
  - ☐ Park Services
  - ☐ Other
- ☑ Proof of Publication
- ☐ Petitions - (Related to extensions, hearings, etc.)
- ☐ Waiver of Department Action
- ☐ Other

Final Determination:

- ☑ Final Determination
- ☑ Signed Permit
- ☒ BACT or LAER Determination
- ☐ Other

Post Permit Correspondence:

- ☐ Extensions/Amendments/Modifications
- ☒ Other

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

1. The following service is requested (check one.)
- ☒ Show to whom and date delivered..... ___¢
- ☐ Show to whom, date and address of delivery.... ___¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ___¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$ ___

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mr. R. L. Monty
P. O. Box 12830
Pensacola, FL 32757

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P167682438	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 10-31-84 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO: 1979-300-459

P167682438

RECEIPT FOR CERTIFIED MAIL

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

SENT TO
Mr. R. L. Monty
STREET AND NO.
P.O., STATE AND ZIP CODE

POSTAGE		$
CONSULT POSTMASTER FOR FEES — CERTIFIED FEE		¢
OPTIONAL SERVICES — SPECIAL DELIVERY		¢
OPTIONAL SERVICES — RESTRICTED DELIVERY		¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		$

POSTMARK OR DATE
10/26/84

PS Form 3800, Apr. 1976

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 25, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. L. Monty
Superintendent, Environmental Health
and Safety
Monsanto Company
Post Office Box 12830
Pensacola, Florida 32757

Dear Mr. Monty:

Enclosed is Permit Number AC 17-87408, dated October 24, 1984, to Monsanto Company, issued pursuant to Section 403, Florida Statutes.

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

Sincerely,

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

CHF/pa

Enclosure

cc: Bruce P. McLeod, P.E., Monsanto Company
Robert V. Kriegel, DER Northwest District

Final Determination

Monsanto Company
Pensacola, Florida
Escambia County

Thermoplastic Rubber Compounding Facility
State Permit Number
AC 17-87408

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

October 9, 1984

Final Determination

Monsanto Company's application for permit to construct a thermoplastic rubber compounding facility at their existing plant in Escambia County has been reviewed by the Bureau of Air Quality Management. Public notice of the department's intent to issue the permit was published in The Pensacola Journal on September 6, 1984

No comments were received on the department's intent to issue the permit. The final action of the department will to be issue the permit as proposed in the August 17, 1984, Technical Evaluation and Preliminary Determination.

CHF/WH/agh

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

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

Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986
County: Escambia
Latitude/Longitude: 30° 35' 28" N/
87° 14' 25" W
Project: Thermoplastic Rubber Compounding Facility

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

Construction of a 3 TPH thermoplastic rubber compounding facility consisting of raw material (rubber, plastic resin, inorganic filler, hydrocarbon oil, organic additives, and inorganic additives) receiving, unloading, storage, and transfer facilities; a blend preparation section having independent batch systems; one extruder line; an unheated pellet dryer; and a pellet handling and packaging section. Particulate matter emissions are controlled with a dust collector and cloth filters. Formaldehyde emissions are controlled by process design.

The construction shall be in accordance with the application signed by Mr. R. L. Monty, Superintendent, on May 18, 1984, except for the changes mentioned in the Technical Evaluation and listed as specific conditions of this permit to construct.

attachment: Application

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

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 Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

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 Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1984

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

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. Thermoplastic rubber production shall not exceed 6,000 lb/hr.

2. The facility may be operated continuously, 8,760 hr/yr.

3. There shall be no visible emissions from pelletized material handling operations at this facility that exceeds 5 percent opacity (6 minute average).

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-85169
Expiration Date: Sept. 1, 1986

SPECIFIC CONDITIONS:

4. The facility shall not allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

5. Particulate matter emissions from the blend preparation dust collector No. 350 shall not exceed 2.2 lb/hr.

6. Ground level ambient air formaldehyde concentration off the plant property shall not exeed 1 PPM (8 hr. average) as determined with Drager tubes or other methods acceptable to the Department.

TWA = 2 PPM or 3 mg/m3

7. A visible emission test by DER Method 9, as described in Rule 17-2.700, FAC, shall be conducted on the discharges from all blowers, air pumps, etc. in the plant, all fume and dust hoods, and raw material unloading operations, when they are operating near the maximum permitted or design capacity, whichever is lower, prior to the expiration of this construction permit. The District shall be given at least 15 days prior notice before the scheduled compliance tests.

8. If the visible emissions from the bin vent bag filter (No. 215), the vacuum blower system (stream B), the blend preparation dust collector (No. 350), drier blower (stream D), or pellet transfer blower (stream E) exceeds 5 percent opacity, the Company shall measure the particulate matter emissions from the stacks that exceeds 5 percent opacity in a manner approved by the Department while the facility is operated at maximum capacity. The District shall be given at least 15 days prior notice before a scheduled compliance test.

9. Prior to the expiration of this construction permit, the stack and ambient air concentrations of formaldehyde shall be measured and mass emissions estimated while the plant is operating near permitted capacity.

10. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the Northwest District at least 90 days prior to the expiration date of this permit. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration or until issuance of an operating permit.

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

SPECIFIC CONDITIONS:

11. Any permit to operate issued for this facility shall require Monsanto Company to submit to the Northwest District office, as a minimum, the following:

a. A description of any physical or operating changes to the facility that may affect the emissions of any air pollutant from it.

b. A recent visible emissions test report on streams A through E as shown in the application and any other potential emission source if directed by the Department.

Issued this 24 day of October, 1984

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Victoria J. Tschinkel
VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To: Clair Fancy Loctn.:
To: Loctn.:
To: Loctn.:
From: Victi Date: 10-24

Reply Optional [ ] Reply Required [ ] Info. Only [ ]
Date Due: Date Due:

DER
OCT 25 1984
BAQM

TO: Victoria J. Tschinkel

FROM: Clair Fancy Clair Fancy

DATE: October ~~18~~ 23, 1984

SUBJ: Approval of Attached Air Construction Permit

Attached for your approval is the Final Determination and Permit to Construct a thermoplastic rubber compounding facility at Monsanto Company's existing plant in Escambia County.

"Notice of Proposed Agency Action on Permit Application" was published in The Pensacola Journal on September 6, 1984. No comments were received on the department's intent to issue the permit. Day ninety, after which the permit would be issued by default, is November 7, 1984.

The Bureau recommends your approval and signature.

CHF/WH/s

attachments

Monsanto

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

DER
SEP 14 1984
BAQM

September 10, 1984

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

Dear Mr. Thomas:

Enclosed is a copy of the Public Notice for Monsanto's Thermoplastic Rubber Compounding Facility, Construction Permit AC17-87408. This Notice was publised on September 6, 1984.

If you have any questions concerning this Public Notice, please feel free to call me at (904) 968-8725.

Sincerely,

Bruce P McLeod

Bruce P. McLeod, Specialist
Environmental Control

enc.

Bill Thomas has copy - Day 90 is Nov. 7

BEST AVAILABLE COPY

The Pensacola Journal

PUBLISHED DAILY EXCEPT SUNDAY

PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,
County of Escambia.

Before the undersigned authority personally appeared

Mary Elizabeth Rost

who on oath says that she is Legal Advertising Supervisor

of the Pensacola Journal, a daily (except Sunday) 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

_____

_____ in the _____ Court,

was published in said newspaper in the issues of _____

_____.

Affiant further say that the said The Pensacola 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 except Sunday, 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.

Mary Elizabeth Rost

Sworn to and subscribed before me this _____

day of _____, A.D., 19____.

_____
NOTARY PUBLIC.

My Commission Expires Oct. 16, 1987

LEGAL NOTICE

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application

The Department gives notice of its intent to issue a permit to Monsanto Company to construct a thermoplastic rubber compounding facility at their existing plant in Escambia County. This plant is located near the intersection of State Roads 292 and 297.

The facility consists of the storage, material handling and process equipment required to produce thermoplastic rubber. Total emissions of particulate matter from this source will be less than 1 TPY. A Best Available Control Technology determination was not required for the proposed facility. The emissions from the thermoplastic rubber compounding facility will not have a significant impact on the ambient air quality.

Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request 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 position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 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 32301. 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:

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

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

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

LEGAL NO. 28915 1 T
SEPT 6, 1984

No. 0156550

RECEIPT FOR CERTIFIED MAIL

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

SENT TO
Mr. R. L. Monty

STREET AND NO.

P.O., STATE AND ZIP CODE

POSTAGE			$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢
OPTIONAL SERVICES	SPECIAL DELIVERY		¢
	RESTRICTED DELIVERY		¢
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES			$

POSTMARK OR DATE

8/24/84

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. R. L. Monty
P. O. Box 12830
Pensacola, Florida 32757

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0156550	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

PENSACOLA FL DOWNTOWN STA POSTMARK AUG 27 1984 USPO CLERK'S INITIALS

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆GPO : 1979-300-459

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 17, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. L. Monty
Superintendent, Environmental Health
and Safety
Monsanto Company
Post Office Box 12830
Pensacola, Florida 32757

Dear Mr. Monty:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a thermoplastic rubber compounding facility at Monsanto Company's existing plant in Escambia County, Florida.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Escambia County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

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,

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

CHF/pa

Attachments

cc: Bruce P. McLeod, P.E.
Robert V. Kriegel

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter on an Application for Permit by:	)	
Monsanto Company P. O. Box 12830 Pensacola, Florida 32575	)	DER File No. AC 17-87408

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its Intent to Issue, and proposed order of issuance for, a permit pursuant to Chapter 403, Florida Statutes, 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 May 22, 1984, to the Department of Environmental Regulation for a permit to construct a thermoplastic rubber compounding facility at their existing plant located north of Pensacola near the intersection of State Roads 292 and 297 in Escambia County.

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 applicant was officially notified by the Department that an air construction permit was required for the proposed work.

This intent to issue shall be placed before the Secretary for final action unless an appropriate petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes, is filed within fourteen (14) days from receipt of this letter or

publication of the public notice (copy attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached), and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witness and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exception to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), 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 Model Rule 28-5.207 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, 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, Tallahase, Florida 32301. 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 Statues.

Executed the 21st day of August, 1984, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

R. L. Monty
Bruce P. McLeod
Robert Kriegel

Technical Evaluation
and
Preliminary Determination

Monsanto Company
Pensacola, Florida
Escambia County

Thermoplastic Rubber Compounding Facility
Proposed State Permit Number
AC 17-87408

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

August 17, 1984

Table of Contents

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action on Permit Application

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The facility consists of the storage, material handling, and process equipment required to produce thermoplastic rubber. Total emissions of particulate matter from this source will be less than 1 TPY. A Best Available Control Technology determination was not required for the proposed facility. The emissions from the thermoplastic rubber compounding facility will not have a significant impact on the ambient air quality.

Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request 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 position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 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 32301. 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:

Department of Enviromental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

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

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

I. Project Description

A. Applicant

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

B. Project and Location

Monsanto Company proposes to construct a thermoplastic rubber compounding facility at their existing plant located near the intersection of State Roads 292 and 297, north of Pensacola, Escambia County, Florida.

The facility will consist of receiving, storage, and conveying equipment for the raw materials (rubber, plastic resins, oils, along with organic and inorganic additives), process equipment [independent batch blending systems, extruder, drier, and pellet handling and packaging system, and emissions control equipment (three bag dust collectors)].

C. Operations

Raw materials (rubber, plastic resin, inorganic filler, hydrocarbon oil, organic additives, and inorganic additives) are brought to the plant in bags, tote bins, hopper trucks, and railcars. Powdered material received in bags and drums is unloaded under dust pick up hoods. This material is air conveyed into hoppers and silos. The contaminated air is passed through cloth filters before being discharged to the atmosphere.

Inorganic filler material is pneumatically transferred to storage. The contaminated air from the transfer blower, 600 dscfm, passes through the bin vent bag filter (No. 215) before being discharged to the atmosphere.

Inorganic filler (up to 600 lb/hr), rubber (up to 2500 lb/hr), and inorganic additives (up to 200 lb/hr) are mixed in independent batch systems. Emissions from this process are controlled by two dust collectors, a 160 dscfm blender dust collector (No. 315) and a 8,600 dscfm dust collector (No. 350).

The material from the blend preparation section is mixed with up to 2,200 lb/hr of plastic resin, 600 lb/hr hydrocarbon oil, and 200 lb/hr organic additive in the extruder. The plastic resin is received in railroad cars and air conveyed to two silos. It is air conveyed from the silos to a cyclone that discharges it into the feed to the extruder. Contaminated air from the cyclone passes through a cloth filter before being discharged to the atmosphere. A pelletized organic additive is received in 1,000 pound containers and vacuum conveyed into a hopper that feeds

then to the stream going to the extruder. The air from the hopper is sucked through a cloth filter before being discharged to the atmosphere. Other organic additives are added directly to the batch systems.

The extruded material passes through an unheated drier that cools the pellet product and removes some moisture. A 2750 dscfm drier blower pulls air through this unit and from the fume pickup points above the extruder line. These fumes contain traces of formaldehyde.

The pellets are then screened and are conveyed in a loop system, with a 300 dscfm of air discharge, to hoppers and silos before being packaged for shipment.

Trash, rubber, compounding additives, and liquid waste generated in the blend preparation and extruder process will be disposed of in accordance with state and federal regulations.

II. Rule Applicability

A. State Regulations

The proposed project, construction of a 3 TPH thermoplastic rubber compounding facility at an existing plant, is subject to preconstruction review under the provisions of Chapter 403, FS, and Chapter 17-2, FAC.

The plant site is in an area designated unclassifiable for sulfur dioxide (Rule 17-2.430, FAC) and attainment for all other criteria pollutants (Rule 17-2.420, FAC).

The plant is a major source of volatile organic compounds (Rule 17-2.100(99), FAC) because total emissions exceed 100 TPY. The proposed facility will emit less than the significant emission rate of any criteria pollutant listed in Table 500-2.

The facility is exempt from the Prevention of Significant Deterioration regulations because the modifications to the plant will not result in a significant net emission increase of any criteria pollutant (Rule 17-2.500(2)(d)4.a.(ii), FAC).

As the area that the proposed facility will be located in is designated attainment for particulate matter and volatile organic compounds, it is not subject to new source review for nonattainment areas (Rule 17-2.510(2)(a)1., FAC).

The facility is subject to Rule 17-2.520, FAC, Sources not subject to PSD or nonattainment requirements. Control of emissions shall be based on Rule 17-2.610, FAC. Particulate matter emissions from the material handling sections are subject to Rule 17-2.610(2)(3), FAC, unconfined emissions. Formaldehyde

emissions from the process are subject to Rule 17-2.620(1)(a), FAC.

B. Federal Regulations

This project is not subject to federal PSD regulations, Section 52.21 of Title 40 of the Code of Federal Regulations (40 CFR 52.21), because the modification to the plant will not cause a significant emission rate increase of any criteria pollutant.

III. Technical Evaluation

A. Air Pollution Control of Particulate Matter

The plastic resin and inorganic additive raw materials are pneumatically transferred from storage to the process. The air streams used to transfer these materials are passed through Dacron felt or equivalent filters before being discharged to the atmosphere. After proper filtration, these streams will have no visible emissions.

The particulate filler is also transferred to storage by a pneumatic conveyor. This air stream, 600 dscfm, passes through the bin vent bag filter (No. 215) before being discharged through a 40 ft. high, 0.42 ft. diameter stack to the atmosphere. The air/cloth ratio of the bag filter will not exceed 7.5. Particulate matter emissions will be 0.02 to 0.03 grains/dscf, which is equivalent to 0.15 lb/hr.

Handling of other raw materials brought into the facility for this process will not create unconfined emissions and, thus, no visible emissions are anticipated from these operations.

Particulate matter emissions from the blend preparation section are controlled with two dust collectors, No. 315 and 350. Dust collector No. 315 will discharge approximately 160 dscfm containing up to 0.03 grains/dscf, which is equivalent to 0.04 lb/hr, through a 20 ft. high, 0.25 ft. diameter stack.

Dust collector No. 350, connected to the pick-up hoods, will discharge 8,600 dscfm through a 40 foot high, 1.5 ft. diamater stack. At 0.03 grains/dscf, the emissions will be 2.2 lb/hr of particulate matter.

B. Air Pollution Control for Formaldehyde

Formaldehyde is released during the reaction of the raw materials. These emissions are controlled by process design. The formaldehyde emissions from the blend preparation section (dust collector 350) are expected to be 0.04 lb/hr. The stack on

then to the stream going to the extruder. The air from the hopper is sucked through a cloth filter before being discharged to the atmosphere. Other organic additives are added directly to the batch systems.

The extruded material passes through an unheated drier that cools the pellet product and removes some moisture. A 2750 dscfm drier blower pulls air through this unit and from the fume pickup points above the extruder line. These fumes contain traces of formaldehyde.

The pellets are then screened and are conveyed in a loop system, with a 300 dscfm of air discharge, to hoppers and silos before being packaged for shipment.

Trash, rubber, compounding additives, and liquid waste generated in the blend preparation and extruder process will be disposed of in accordance with state and federal regulations.

II. Rule Applicability

A. State Regulations

The proposed project, construction of a 3 TPH thermoplastic rubber compounding facility at an existing plant, is subject to preconstruction review under the provisions of Chapter 403, FS, and Chapter 17-2, FAC.

The plant site is in an area designated unclassifiable for sulfur dioxide (Rule 17-2.430, FAC) and attainment for all other criteria pollutants (Rule 17-2.420, FAC).

The plant is a major source of volatile organic compounds (Rule 17-2.100(99), FAC) because total emissions exceed 100 TPY. The proposed facility will emit less than the significant emission rate of any criteria pollutant listed in Table 500-2.

The facility is exempt from the Prevention of Significant Deterioration regulations because the modifications to the plant will not result in a significant net emission increase of any criteria pollutant (Rule 17-2.500(2)(d)4.a.(ii), FAC).

As the area that the proposed facility will be located in is designated attainment for particulate matter and volatile organic compounds, it is not subject to new source review for nonattainment areas (Rule 17-2.510(2)(a)1., FAC).

The facility is subject to Rule 17-2.520, FAC, Sources not subject to PSD or nonattainment requirements. Control of emissions shall be based on Rule 17-2.610, FAC. Particulate matter emissions from the material handling sections are subject to Rule 17-2.610(2)(3), FAC, unconfined emissions. Formaldehyde

dust collector 350 is 40 feet high, 1.5 feet in diameter and exhausts 8,600 dscfm.

The dryer blower exhausts 2,750 dscfm from the pellet drier and fume pickup points above the extruder line through a 40 ft. high, 0.83 ft. diameter stack. This air is expected to contain 0.28 lb/hr of formaldehyde.

The pellet transfer blower discharges 300 dscfm of air from the pellet handling and packaging section through a 40 ft. high, 0.33 ft. diameter stack. This stack will emit 0.003 lb/hr of formaldehyde.

The formaldehyde emissions from the process will result in a ground level concentration of no more than 1 ppm. This is less than the TLV-TWA value of 2 ppm and, thus, should cause no health hazards. At this concentration, the odor of formaldehyde is detectable. The company will be required to take precautions to prevent objectionable odors from escaping from the process.

C. Summary of Emissions

The emissions from the proposed project are listed below.

Source	Pollutant	Emissions
All pelletized material handling operations	Particulate Matter	No visible emissions
Bin vent bag filter No. 215, controlling the particulate filler receiving, storage and transfer section	Particulate Matter	0.15 lb/hr
Blender dust collector, No. 315, controlling the blend preparation section	Particulate Matter	0.04 lb/hr
Dust collector No. 350 connected to the blend preparation pickup hoods	Particulate Matter	2.2 lb/hr
	Formaldehyde	0.04 lb/hr
Drier blower that is connected to the pellet dryer and the extruder line fume pickup hoods	Formaldehyde	0.28 lb/hr

Source	Pollutant	Emissions
Pellet handling and packaging section	Formaldehyde	0.003 lb/hr
General	Fumes	No objectionable odor

IV. Conclusion

Based on the data submitted in the application for permit to construct a thermoplastic rubber compounding facility by Monsanto Company, the Department has concluded that the proposed facility can be built and operated in compliance with all applicable air pollution control regulations. The Department proposes to issue a construction permit for the facility. The General and Specific Conditions listed in the proposed permit (attached) will assure compliance of the source with the Department's air pollution control regulations.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

DRAFT

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

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

Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986
County: Escambia
Latitude/Longitude: 30° 35' 28" N/ 87° 14' 25" W
Project: Thermoplastic Rubber Compounding Facility

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

Construction of a 3 TPH thermoplastic rubber compounding facility consisting of raw material (rubber, plastic resin, inorganic filler, hydrocarbon oil, organic additives, and inorganic additives) receiving, unloading, storage, and transfer facilities; a blend preparation section having independent batch systems; one extruder line; an unheated pellet dryer; and a pellet handling and packaging section. Particulate matter emissions are controlled with a dust collector and cloth filters. Formaldehyde emissions are controlled by process design.

The construction shall be in accordance with the application signed by Mr. R. L. Monty, Superintendent, on May 18, 1984, except for the changes mentioned in the Technical Evaluation and listed as specific conditions of this permit to construct.

attachment: Application

DRAFT

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

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.

DRAFT

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

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.

DRAFT

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1984

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

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. Thermoplastic rubber production shall not exceed 6,000 lb/hr.

2. The facility may be operated continuously, 8,760 hr/yr.

3. There shall be no visible emissions from pelletized material handling operations at this facility that exceeds 5 percent opacity (6 minute average).

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-85169
Expiration Date: Sept. 1, 1986

SPECIFIC CONDITIONS:

4. The facility shall not allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

5. Particulate matter emissions from the blend preparation dust collector No. 350 shall not exceed 2.2 lb/hr.

6. Ground level ambient air formaldehyde concentration off the plant property shall not exeed 1 PPM (8 hr. average) as determined with Drager tubes or other methods acceptable to the Department.

7. A visible emission test by DER Method 9, as described in Rule 17-2.700, FAC, shall be conducted on the discharges from all blowers, air pumps, etc. in the plant, all fume and dust hoods, and raw material unloading operations, when they are operating near the maximum permitted or design capacity, whichever is lower, prior to the expiration of this construction permit. The District shall be given at least 15 days prior notice before the scheduled compliance tests.

8. If the visible emissions from the bin vent bag filter (No. 215), the vacuum blower system (stream B), the blend preparation dust collector (No. 350), drier blower (stream D), or pellet transfer blower (stream E) exceeds 5 percent opacity, the Company shall measure the particulate matter emissions from the stacks that exceeds 5 percent opacity in a manner approved by the Department while the facility is operated at maximum capacity. The District shall be given at least 15 days prior notice before a scheduled compliance test.

9. Prior to the expiration of this construction permit, the stack and ambient air concentrations of formaldehyde shall be measured and mass emissions estimated while the plant is operating near permitted capacity.

10. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the Northwest District at least 90 days prior to the expiration date of this permit. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration or until issuance of an operating permit.

DRAFT

PERMITTEE:
Monsanto Company

I. D. Number:
Permit Number: AC 17-87408
Expiration Date: Sept. 1, 1986

SPECIFIC CONDITIONS:

11. Any permit to operate issued for this facility shall require Monsanto Company to submit to the Northwest District office, as a minimum, the following:

a. A description of any physical or operating changes to the facility that may affect the emissions of any air pollutant from it.

b. A recent visible emissions test report on streams A through E as shown in the application and any other potential emission source if directed by the Department.

Issued this ___ day of_____, 1984

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

_____
VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

Monsanto

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

DER
AUG 14 1984
BAQM

August 6, 1984

Mr. Willard Hanks
Central Air Permitting
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Hanks:

This letter is to describe waste dispositioning from the Santoprene® Thermoplastic Rubber Compounding Facility.

Non-hazardous solid waste such as trash, rubber, compounding additives from dust collectors, and packaging materials such as bags and boxes will be disposed of at the Escambia County Landfill.

Liquid waste or solid waste which meets the definition of RCRA hazardous or is inappropriate for sanitary landfill disposal will be disposed of at the Pensacola plant which is a hazardous waste treatment storage and disposal facility or through authorized contract hazardous waste disposal company.

Sincerely,

Bruce P. McLeod

Bruce P. McLeod, Specialist
Environmental Control

AC17-87408

Monsanto

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

DER
JUL 6 1984
BAQM

July 2, 1984

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Balir Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

This letter is in response to the letter,C. H. Fancy, P.E. to Bruce. P. McLeod, dated June 7, 1984,regarding the additional information request for the Santoprene® facility. The item numbers below correspond to item numbers of the June 7, 1984 letter.

1. No increase in production of any existing Pensacola plant equipment will be caused by the Santoprene® facility.

2. All means of raw material and product movement may be employed including bags, tote bins, hopper trucks, and rail cars. It is believed that the emissions information already submitted represents all significant air-pollution emission sources.

   Fugitive emissions are adequately controlled. Bag and drum emptying operations are controlled with dust pick-up hoods. Additive blend hoppers are also equipped with dust collection pickups. Dust collector #350 is supplied to control the particulates from these sources.

   Particulate emissions control can be summarized for all raw material streams as follows (see application Section II, Part A):

	Dust Collector Device No.
Rubber	#350
Plastic Resin	none, see Supplement G
Inorganic Filler	#215 and 350
Hydrocarbon Oil	none
Organic Additives	#350
Inorganic Additives	#350

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2. (continued)

   A discussion of the pelletized raw material and product handling operations is attached as Supplement G to the Construction Permit Application. These operations are not anticipated to be a source of suspended particulates. To confirm this assumption, Monsanto would be willing to conduct a one time visible emissions observation (Method 9) of these vents, to document zero visible emissions.

3. The process raw materials proposed for use are not VOCs.

4. Maximum process input will equal process output, which is estimated at 6000 pph or 26,280 tons/year. Process design capability will allow sustained operation at near maximum capacity.

5. The main raw materials and products are in a pelletized form approximately 1/8" in size (see Supplement G). Ninety-nine percent or greater of these materials should be retained on a 10 mesh screen (.0661" openings). These Materials are not considered a source of suspended particulate emissions.

   Some minor additives are likely to be received in powdered form, but dust emissions from this material handling will be controlled by bag filter #350 described in the original transmittal.

6. No other air pollutants other than particulates and formaldehyde are anticipated.

7. Exact Models of the bag filters have not been selected. Bag filter specifications to be met by the vendor will be average dust emissions of .02 grains/SCF. Maximum dust emissions will not exceed .03 grains/SCF. The air/cloth ratio for all bag filters will not exceed 7.5.

   The bag filter type will be an air jet pulsed fabric bag filter of the micro pulsair type or equivalent system.

8. After process start-up and stabilization, Monsanto proposes to confirm process vent and ground level concentrations of formaldehyde with a one time sampling exercise, employing Drager tubes (color indicator-direct readout concentration measurement).

   If mass emission rate of pollutants is required, it is proposed that the design flow rate of the blower, fan, or compressor be used. The small size of the exhaust stacks makes pitot tube use impractical.

COMPANY CONFIDENTIAL

9. There is no source of heat to the pellet dryer. Cooling of the pellets causes a slight increase in exit air temperature.

10. No other sources of air pollution other than those already described are anticipated at this time.

11. Plot plans are furnished.

This information is considered to be Company Confidential and should be afforded all available Department confidentiality protection.

Sincerely,

Bruce P. McLeod

Bruce P. McLeod, Specialist
Environmental Control

atts.

cc: Mr. Willard Hanks, DER, Tallahassee
Mr. Jack Preece, DER, Pensacola
Mr. R. L. Monty, Monsanto, Pensacola

COMPANY CONFIDENTIAL

MONSANTO PENSACOLA
SANTOPRENE® THERMOPLASTIC
RUBBER COMPOUNDING FACILITY

Supplement G

Pelletized Raw Material and Product Discussion
(Not anticipated to be a source of suspended particulate emissions)

Plastic Resin Raw Material Transfer and Storage System

Plastic resin (flow diagram, line 4) is received in rail cars and air conveyed into 1 of 2 silos vented to atmosphere with no controls. This plastic resin is either hot or cold cut into 1/8" spheres or 1/8" by 1/8" pellets. Ninety-nine percent of the plastic pellets is retained on a 10 mesh screen (.0661") and 99.9% on a 100 mesh screen (150 micron mesh size). From the storage silos, the plastic pellets are air conveyed to a cyclone vented to atmosphere through a standard Dacron felt sock. The polypropylene drops into a hopper which feeds the extruder line.

Pelletized Process Additive

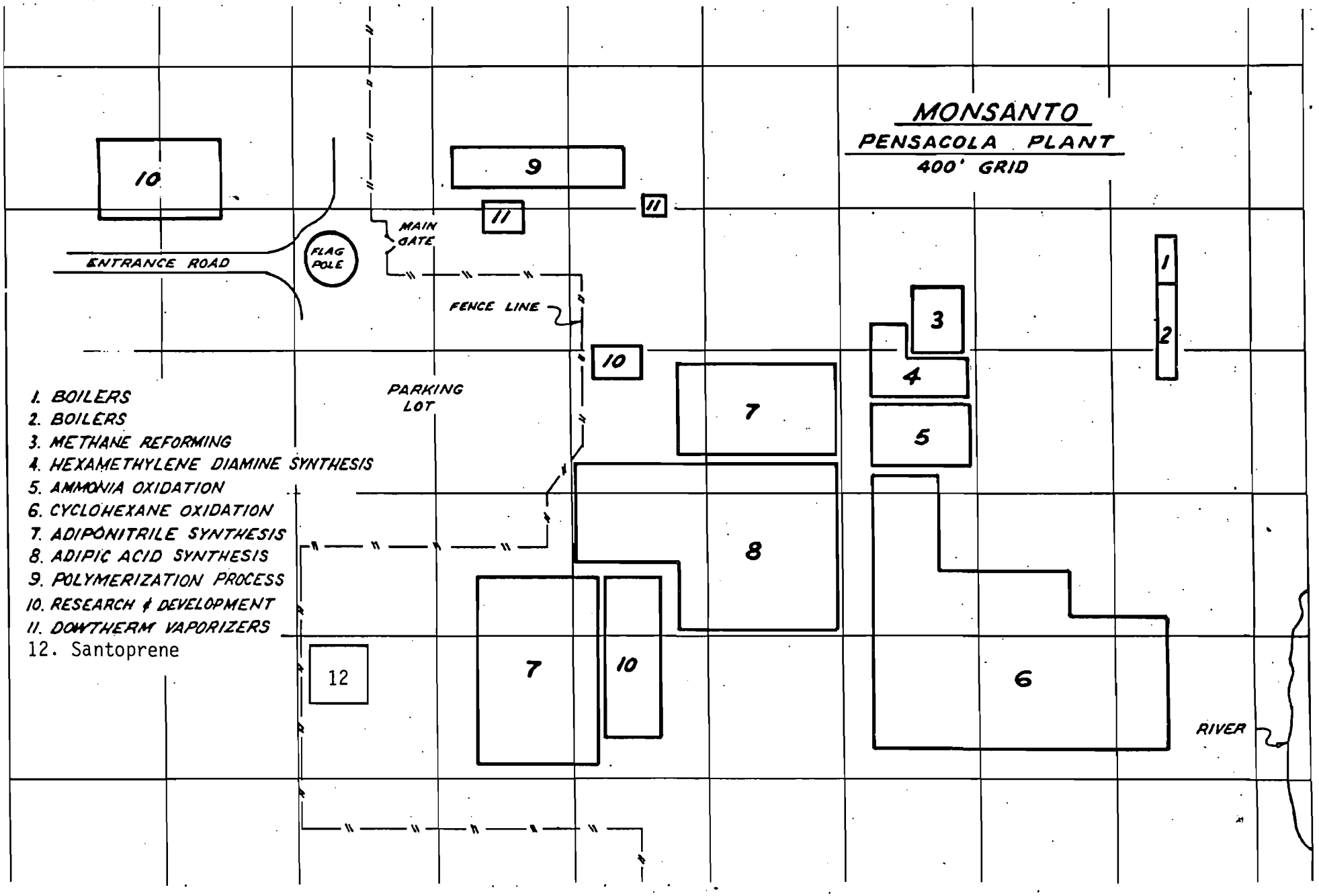
One of the process additives (flow diagram, line 6) is impregnated in plastic pellets similar in size to plastic resin. The pellets are received in 1000 lb. cartons and vacuum conveyed into a hopper which feeds the extruders. The vent from the hopper is filtered before the vacuum blower .

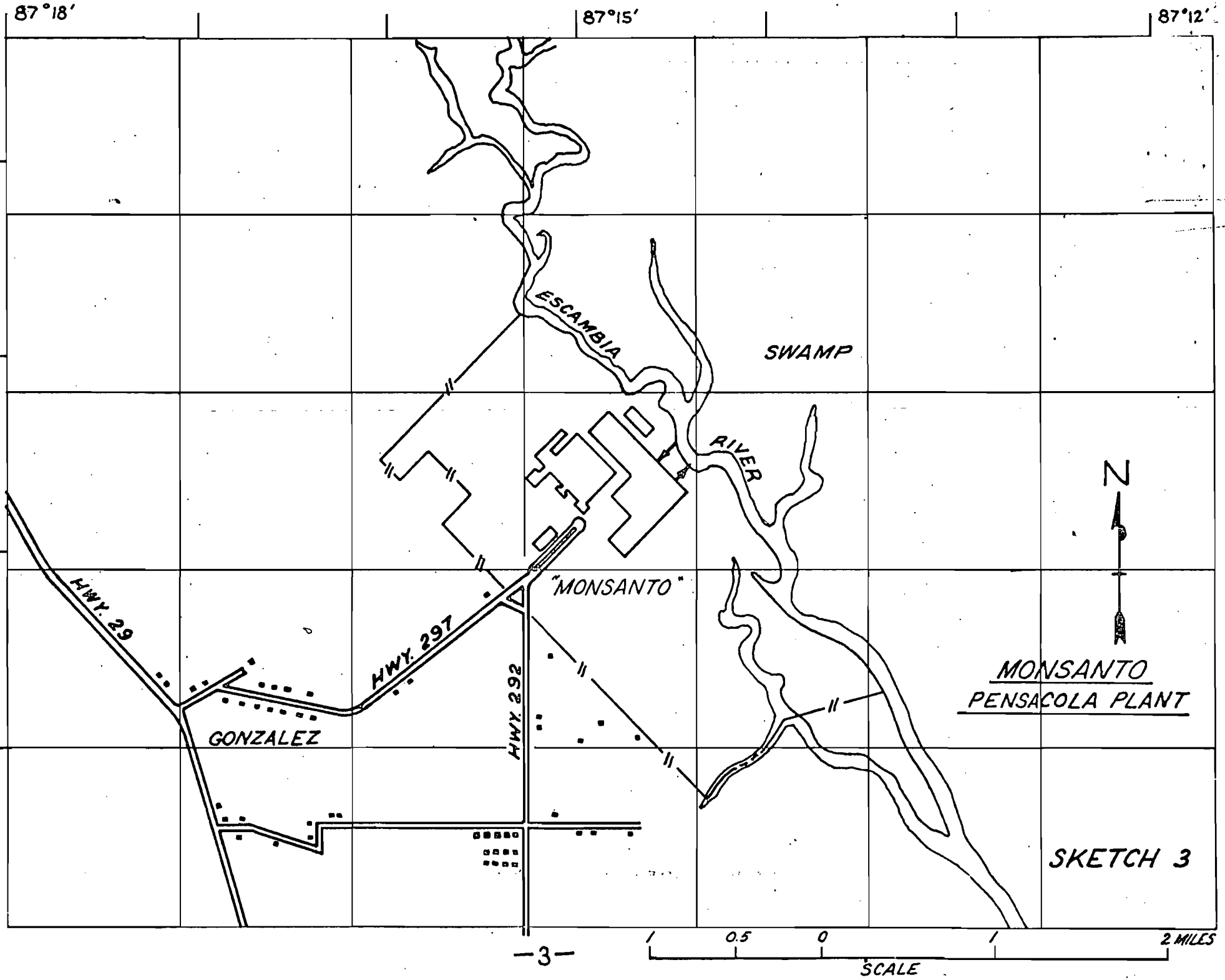
Finished Product Transfer and Packaging

The finished product is a 1/8" x 1/8" rounded cylinder. After drying, the product is screened to capture any fines that may be generated during the pelletizing operation. The screened product (over 99% is retained in a 10 mesh, .0661 inch screen) is air conveyed into a four compartmented hopper which is vented through a standard Dacron felt filter.

From the hopper, the product is air conveyed to silos and packaging in a closed loop system. There are no vents in this system.

COMPANY CONFIDENTIAL


MONSANTO
PENSACOLA PLANT
400' GRID
ENTRANCE ROAD
FLAG POLE
MAIN GATE
FENCE LINE
PARKING LOT
RIVER
1. BOILERS
2. BOILERS
3. METHANE REFORMING
4. HEXAMETHYLENE DIAMINE SYNTHESIS
5. AMMONIA OXIDATION
6. CYCLOHEXANE OXIDATION
7. ADIPONITRILE SYNTHESIS
8. ADIPIC ACID SYNTHESIS
9. POLYMERIZATION PROCESS
10. RESEARCH & DEVELOPMENT
11. DOWTHERM VAPORIZERS
12. Santoprene


87°18'
87°15'
87°12'
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ESCAMBIA
RIVER
SWAMP
"MONSANTO"
HWY. 29
HWY. 297
HWY. 292
GONZALEZ
N
MONSANTO
PENSACOLA PLANT
SKETCH 3
1
0.5
0
1
2 MILES
SCALE

No. 0156519

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO
Mr. Bruce P. McLeod

STREET AND NO.

P.O., STATE AND ZIP CODE

POSTAGE		$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢
	SPECIAL DELIVERY	¢
	RESTRICTED DELIVERY	¢
OPTIONAL SERVICES — RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		$

POSTMARK OR DATE

6/18/84

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Bruce P. McLeod
P. O. Box 12830
Pensacola, Florida 32575

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0156519	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY: JUN 19 1984

POSTMARK: PENSACOLA, FLORIDA JUN 19 1984 USPO

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

June 7, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bruce P. McLeod
Monsanto Company
P. O. Box 12830
Pensacola, Florida 32575

Dear Mr. McLeod:

The department has made a preliminary review of your application for a permit to construct a Santoprene thermoplastic rubber compounding facility at Monsanto Company's plant near Pensacola, Florida. Before the application can be processed, the department will need the information requested below.

1. Will the proposed facility cause an increase in production of any existing equipment at Monsanto Company's plant? If so, estimate the increase in actual emissions from the existing equipment that can be attributed to the proposed facility.

2. How will the raw materials and products for the proposed facility be received, stored, and transferred to and from the plant? Please estimate the quantity of air pollutants emitted by the material handling operations.

3. Are any of the raw materials used in the process classified as volatile organic compounds (VOC)? If so, estimate the maximum VOC emissions to the atmosphere from the proposed facility.

4. What is the maximum quantity (TPY) of raw materials that will be used in the process (i.e.-Clay, 2,000 TPY)?

5. Do any of the materials used in the process, other than clay, contain fines? If so, what are the particle size distributions in the materials?

6. Will the proposed facility emit any air pollutants other than particulate matter and formaldehyde? If so, list the other air pollutants emitted, estimate the amount emitted

and, if TLVs values have been published for the pollutants, the maximum ground level concentrations expected.

7. Please provide brochures or design specifications for all air pollution control equipment, including the bag filter designated number 315, proposed for the rubber compounding facility.

8. How will Monsanto Company confirm the estimated emissions and ambient air concentration of formaldehyde from the proposed facility?

9. What is the source of heat for the pellet dryer?

10. Will the proposed facility have any other sources of air pollution, other that those listed in the application and the reply to this letter, associated with it?

11. Please furnish the two plot plans requested in questions 7 and 8 of Section V of the application.

The department will resume processing this application as soon as the information requested above is received. If you have any questions on the data needed, please call Willard Hanks at (904)488-1344.

Sincerely,

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

CHF/WH/s

cc: J. Preece

Monsanto

WORKING FUND ACCOUNT
MONSANTO COMPANY
PENSACOLA, FLORIDA

720 01073

62-20
311

05/21/84

$100.00

★ $100 AND 00 CTS

PAY TO THE ORDER OF DEPARTMENT OF ENVIRONMENTAL REGULATION

Citibank (Delaware)

[signature] [signature]

[redacted] [redacted]

MONSANTO COMPANY, PENSACOLA, FLORIDA

P-21 05/21/84 THE ATTACHED CHECK IS IN PAYMENT OF THE FOLLOWING: 720 01073

DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMO	DATE	INVOICE NO.	AMOUNT	DEDUCTIONS & DISCOUNT	NET
Santoprene[R] Thermoplastic Rubber Compounding Facility Air Pollution Construction Permit (B.P. McLeod)	05/21/84		$100.00		$100.00

DETACH BEFORE DEPOSITING

CH 142

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

№ 76032

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Monsanto Date June 8, 1984

Address Pensacola, Florida Dollars $ 100.00

Applicant Name & Address Same as above

Source of Revenue

Revenue Code 001001 Application Number AC 17-87408

By Patricia G. Adams

Monsanto

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

DER
MAY 22 1984
BAQM

May 17, 1984

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

Dear Mr. Fancy:

Enclosed is an application for an Air Pollution Source Construction Permit submitted in quadruplicate. Also enclosed is a check for $100.00 to cover the construction permit's processing fee. This application is for a Santoprene® Thermoplastic Rubber Compounding Facility.

If you have any questions, please do not hesitate to contact me at (904) 968-8725.

Sincerely,

Bruce P. McLeod

Bruce P. McLeod, Specialist
Environmental Control

enc.

cc: Jay Griffith
Monsanto
Pensacola, Florida 32575

Best Available Copy

AC 17-87408

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

DER

MAY 22 1984

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROBERT V. KRIEGEL
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [x] New[1] [ ] Existing[1]

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) Santoprene® Thermoplastic Rubber Compounding Facility

SOURCE LOCATION: Street Intersection State Roads 292 and 297 City

UTM: East North

Latitude 30 ° 35 ' 28 "N Longitude 87 ° 14 ' 25 "W

APPLICANT NAME AND TITLE: R. L. Monty, Supt., Environmental Health and Safety

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

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Monsanto

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:

R. L. Monty, Supt., Environmental Health and Safety
Name and Title (Please Type)

Date: 5/18/84 Telephone No. (904) 968-7411

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, P.E.

Bruce P. McLeod, P.E.
Name (Please Type)

Monsanto
Company Name (Please Type)

P. O. Box 12830 Pensacola, Florida 32575
Mailing Address (Please Type)

Florida Registration No. 26956 Date: 5/18/84 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.

See Addendum #1

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

Start of Construction upon receipt of Construction Permit Completion of Construction July 1, 1986

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.)

Bag dust collector #315 - not applicable - integral to the process

Bag filter #215 $20,000

Dust Collector #350 $60,000

D. 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? not applicable

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

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 justification for any answer of "No" that might be considered questionable.

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Rubber	not applicable		0-2500	stream 2
Plastic Resin	"	"	0-2200	stream 4
Inorganic Filler	"	"	0-0600	stream 1
Hydrocarbon Oil	"	"	0-0600	stream 5
Organic Additives	"	"	0-0200	stream 6
Inorganic Additives	"	"	0-0200	stream 3

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

1. Total Process Input Rate (lbs/hr): 0 - 6000

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[1]		Allowed[2] 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/yr	T/yr	
Particulates	.15	.05	see note	.15		34	A
Particulates	.04	.12	see note	.04	not applicable		B
Particulates	2.2	.49	see note			48.8	C
Formaldehyde	0.04	0.2	Not Applicable			0.2	C
Formaldehyde	0.28	1.2	Not Applicable			1.2	D
Formaldehyde	0.003	0.013	Not Applicable			0.013	E

[1] See Section V, Item 2.

[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)

[3] Calculated from operating rate and applicable standard.

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

Note: 17-2.612 (1) and (2) apply (i.e., process weight table and 20% opacity). Permittee suggested permit limits are .03 grains/cu. ft. for suspended particulate discharge and a waiver of particulate testing with operation at 5% opacity or less.

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)
Bag Filter #215	Particulate	99+%	0.1 - 100	Typical for bag filters
Dust Collector #350	Particulate	99+%	0.1 - 100	Typical for bag filters
Dust Collector #315	Not Applicalbe - Integral to the process			

E. Fuels Not Applicable

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.

Trash, rubber, and compounding additives and liquid wastes will be generated and disposed of according to all State and Federal regulations.

SEE ADDENDUM 2

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

Not Applicable

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							
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	
Primery Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

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

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

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

_____

_____

_____

_____

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

_____

_____

_____

_____

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.

Best Available Copy

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.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

NOT APPLICABLE

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

[ ] Yes [ ] No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:

Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

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 Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

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 propcsed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]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:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

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:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

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:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICAMT DETERIORATION NOT APPLICABLE

A. Company Monitored Data

1. _____no. sites _____ TSP _____( ) SO^{2*} _____ 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^2	_____ 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.

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

PROJECT DESCRIPTION

ADDENDUM #1

This project will construct a rubber compounding facility. Design of the facility will allow for future production capability expansions. Rubber, oil, resin, and additives are stored, blended, compounded, and packaged to produce many types of Santoprene® thermoplastic rubber.

Three dust collectors will be employed to control particulate emissions from powder handling and processing operations. Air conveying of pelletized raw materials and products is not considered to be a potential source of suspended particulates.

Air discharged from product compounding, drying, and handling will contain small amounts of formaledhyde. These emissions are effectively controlled by process design. Ground level concentrations of formaldehyde will not exceed the ceiling limit value of 1 ppm formaldehyde.

The project will fully comply with all applicable regulations.

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

Addendum 2

	STREAM				
	A	B	C	D	E
Stack height (ft.)	40	20	40	40	40
Gas flow rate (DSCFM)	600	160	8600	2750	300
Water vapor content (%)	ambient	ambient	ambient	5%	ambient
Stack diameter (ft.)	.42	.25	1.5	.83	.33
Gas exit temp. (^{o}F)	ambient	ambient	ambient	50^{o}C	ambient + 10^{o}C
Velocity (FPS)	73	55	81	83	57

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

SECTION III C CALCULATION BASES

Maximum lb./hr. emissions	=	based on .03 grains/SCF
Actual tons/yr. emissions	=	based on .02 grains/SCF design basis
Allowed emission [a]	=	.03 grains/SCF and a waiver of particulate emissions compliance testing with operation at 5% opacity or less.
Allowable	=	(Operating rate x .03 grains/cu. ft.)
Potential	=	34 lb./ton :AP42 clay handling

[a] Permittee suggested emission limit.

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

SUPPLEMENT A

DUST COLLECTOR #215

From AP42 Clay handling unabated emissions

Unabated

34 lb./ton x 2000 tons clay/yr. x 1 ton/2000 lbs. = 34 tons/year

Abated Emissions

Actual Average Emissions

.02 grain/SCF x 1 lb./7000 grain x 600 $ft.^3$/min. x 60 min./hr. x 1000 hr/year =

103 lb/yr. = .05 tons/year

Actual Maximum (instantaneous)

.03 grain/$ft.^3$ x 1 lb./7000 grains x 600 ft^3/ min. x 60 min./ hr. = .154 lb./hr.

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

SUPPLEMENT B

DUST COLLECTOR #315

Unabated - not applicable

Dust Collector #315 is integral to the process and therefore is not deemed abatement equipment.

Actual Average Emissions

.02 gr./ft.^{3} x 1 lb./7000 gr. x 160 ft.^{3}/min. x 60 min./hr. x 24 hrs./day x 365 days/year = 240 lb./yr. x 1 ton/2000 lbs. = .12 tons/year

Maximum Emissions

.03/gr./ft.^{3} x 1 lb./7000 x 160 ft.^{3}/min. x 60 min./hr. = .04 lb./hr.

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

SUPPLEMENT C

BAG FILTER # 350

Unabated (from clay handling AP42)

0.164 clay fraction x 4000 lbs./hr. x 1 ton/2000 lbs. x 34 lb./ton =

11.15 lbs./hr. x 24 hrs./day x 365 days/yr. x 1 ton/2000 lbs. = 48.8 tons/yr.

Abated

Instantaneous maximum

1 lb./7000 gr. x .03 gr./ft.^{3} x 8600 ft.^{3}/min. x 60 min./hr. = 2.21 lbs. hr.

Actual yearly emissions

*.0015 gr./ft.^{3} x 1 lb./7000 gr. x 8600 ft.^{3}/min. x 60 min./hr. x

24 hrs./day x 365 days/yr x 1 ton/2000 lbs. = .49 tons/year

*This bag filter services five independent batch systems. The actual particulate emissions is an estimated long term average.

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER
COMPOUNDING FACILITY

SUPPLEMENT D

DUST COLLECTOR #350

Calculation of estimated formaldehyde emissions

8600 SCFM x 1 ft.^{3} HCHO/10^6 ft.^{3} x 60 min.hr. x

1 lb. mole/359 ft.^{3} HCHO x 30 lbs. HCHO/1 lb. mole =

.043 lb./hr. HCHO x 24 hrs./day x 356 days/yr. x

1 ton/2000 lbs. = .19 ton HCHO/yr.

MONSANTO PENSACOLA

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SUPPLEMENT E

Dryer Exahust

Calculation of estimated formaldehyde emissions

2750 ft.^{3} air/min. x 20 ft.^{3} HCHO/10^6 ft.^{3} air x 60 min./hr. x

1 lb. mole HCHO/359 ft.^{3} HCHO x 30 lbs. HCHO/1 lb. mole =

.276 pph HCHO x 24 hrs./day x 365 days/year x 1 ton/2000 lbs. =

1.21 tons/yr. HCHO

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SUPPLEMENT F

Pellet Exhaust

Calculation of estimated formaldehyde emissions

300 $ft.^3$/min. x 2 $ft.^3$ HCHO/10^6 $ft.^3$ air x 60 min./hr. x

1 lb. mole/359 $ft.^3$ HCHO x 30 lbs. HCHO/1 lb. mole =

.003 lb./hr. x 24 hrs./day x 365 days/yr. x 1 ton/2000 lb. =

.013 ton/year

MONSANTO PENSACOLA

SANTOPRENE® THERMOPLASTIC RUBBER COMPOUNDING FACILITY

FLOW DIAGRAM