

Check Sheet

Company Name: Monsanto Chemical Company
Permit Number: A C 17- 175045, - 212958
PSD Number: _____
Permit Engineer: _____

Application:

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

Cross References:

- Advanced Elastomer
- Systems
-

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 Transfer & permit

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 R. E. Caison, Plant Mgr.
 Advanced Elastomer Sys.
 604 Chernstrand Rd
 Cantonment, FL 32533

4a. Article Number
 P 710 058 490

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 18 June 92

5. Signature (Addressee)
R. E. Caison

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

P 710 058 490

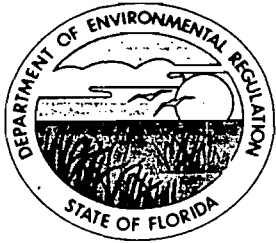


Certified Mail Receipt

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to <i>RE Caison</i>	
Street & No. <i>Adv. Elastomer Sys</i>	
P.O., State & ZIP Code <i>Cantonment, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	<i>AC 17-175045 6/17</i>

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 11, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. E. Caison, Plant Manager
Advanced Elastomer Systems, L.P.
604 Chemstrand Road
Cantonment, Florida 32533

Dear Mr. Caison:

The Department received your request for amendment of the construction permit referenced below. The request is acceptable and the permit is amended as shown:

Permit No. AC 17-175045

Specific Condition No. 3: Deleted

Specific Condition No. 4:

From:

Visible emissions from the fabric filter shall not be greater than 20% opacity and compliance shall be demonstrated at 90-100% of capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

To:

Visible emissions from the fabric filter shall not be greater than 5% opacity and compliance shall be demonstrated at 90-100% of capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

This letter shall become Attachment No. 2 to this permit.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the

Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

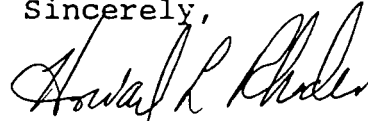
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c)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

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

Mr. R. E. Caison
Page 3 of 3

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

Sincerely,



Howard L. Rhodes
Interim Director
Division of Air Resources
Management

HLR/plm

cc: E. Middleswart, NWD



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Howard Rhodes
FROM: Clair Fancy *CF*
DATE: June 4, 1992
SUBJ: Amendment to Construction Permit No. AC 17-175045
Advanced Elastomer Systems, L.P.

Attached for your approval and signature is a letter modifying the particulate and visible emission limitations in the above referenced construction permit.

The Bureau recommends approval of this amendment.

CF/JR/plm

Attachment



**Advanced
Elastomer
Systems**

RECEIVED
DER - MAIL ROOM
1992 APR 20 AM 10:45
Advanced Elastomer Systems, L.P.
604 Chemstrand Road
Guntersville, Florida 32533
904-968-3900
FAX 904-968-3903

April 14, 1992

Mr. C. F. Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Air Construction Permit No. AC 17-175045

Dear Mr. Fancy:

This is in response to your April 3 letter concerning the subject construction permit. Advanced Elastomer Systems, L.P., requests that the permit be amended to reflect only visible emissions testing rather than the current Method 5 test.

I have attached the results from visible emissions testing completed March 18, 1992. Also attached is the required \$250 check for permit amendment.

Regarding the permit transfer from Monsanto to AES, I have attached both our completed DER Form 17-1.201 (submitted 1/04/91) and the acceptance letter from the DER.

If you have additional concerns, please contact me at (904) 968-3901.

Sincerely,

R. E. Caison
Plant Manager

JTG:lhb
Attachments

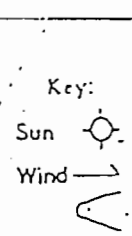
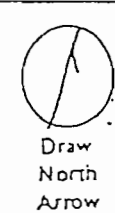
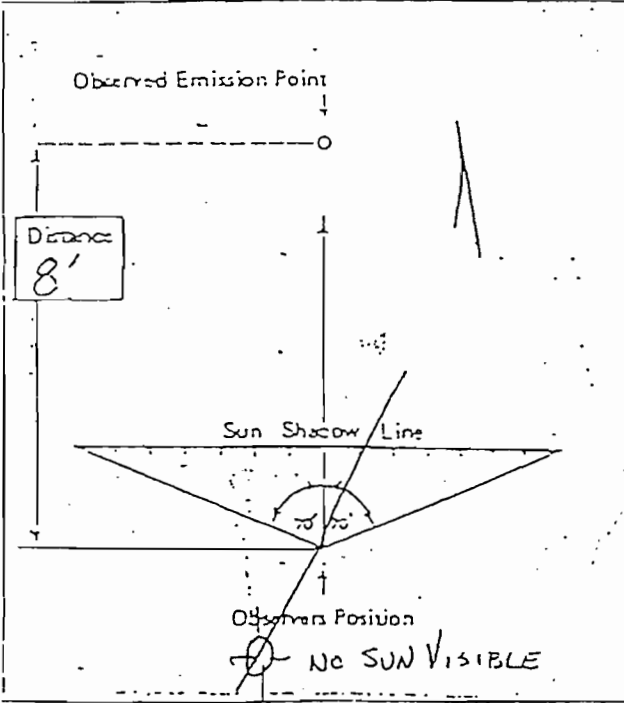
cc: S. M. Bruce
J. T. Gummersbach
B. P. McLeod
J. G. Wiley

J. Reynolds
E. Middlerwart, NW Dist.

1031

Source/Process Information			Opacity Readings			
Monsanto Chemical Company			3/18/92	1312	1342	
3000 Old Chemstrand Rd., Cantonment, FL			0	0	0	0
R. T. Cannon (904) 968-7770			0	0	0	0
OPERATING MODE: RUNNING			0	0	0	0
RECEPT ABOVE GROUND LEVEL: 5			0	0	0	0
RECEPT RELATIVE TO EYE LEVEL: 0			0	0	0	0

Emissions Description			Opacity Readings			
DESCRIBE EMISSIONS: NO VISIBLE EMISSIONS			0	0	0	0
FLUKE COLOR: _____			0	0	0	0
WATER DRUMS/PANES PRESENT: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>			0	0	0	0
Meteological Information			0	0	0	0
BACKGROUND BUILDING: WHITE			0	0	0	0
SKY CONDITION: 100% OVERCAST			0	0	0	0
WIND SPEED: 10-12			0	0	0	0
WIND DIRECTION: SE			0	0	0	0
Observation Date, Site Diagram			0	0	0	0



Compliance Information		Certification Data, Signatures	
OBSERVER'S NAME: Charles C. Doll		DATE: 3/18/92	
OBSERVER'S SIGNATURE: Charles C. Doll		ORGANIZATION: Monsanto Company	
CERTIFIED BY: EPA & State of Florida		DATE: 2/3/92	



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
APPLICATION FOR TRANSFER OF PERMIT

Permit No. AC17-175045 Date Issued 8/10/90 Date Expires 6/30/92

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: Compounded Rubber Fabric Filter County: Escambia
Source Location: 3000 Old Chemstrand Road City: Gonzalez, Florida
Permittee Name: L. F. Hebert, Monsanto Company Title: Plant Manager
Mailing Address: P. O. Box 12830, Pensacola, Florida 32575

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at Pensacola L. F. Hebert / [Signature]
County, Escambia Signature of Permittee
this 27th day of November 19 90. Title Plant Manager
Jennett Spicer Date: 11-27-90
Notary Public

My Commission Expires: August 15, 1994

REQUEST FOR TRANSFER OF PERMIT

Source Name: Advanced Elastomer Systems, L.P.
Applicant Name: Robert E. Caison Title: Plant Manager
Mailing Address: 604 Chemstrand Road
Cantonment, FL 32533 Telephone: (904) 968-3901
area

Project Engineer: Name: _____
Mailing Address: _____
Telephone: () area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. AC17-175045 was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Pensacola Robert E. Caison
County, Escambia Signature of Applicant
this 4 day of Jan 19 91. Title Plant Manager
Wanda Washington Date: 1/4/91
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA.
My Commission Expires: SEPT. 4, 1994.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

*Attach letter of authorization if other than owner or corporate officer.



CONST

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
APPLICATION FOR TRANSFER OF PERMIT

Permit No. AC17-159577 Date Issued 4/13/89 Date Expires 5/1/91

NOTIFICATION OF SALE OR LEGAL TRANSFER
Source Name: Santoprene^R Compounding Modification County: Escambia
Source Location: 3000 Old Chemstrand Road City: Gonzalez, Florida
Permittee Name: L. F. Hebert, Monsanto Company Title: Plant Manager
Mailing Address: P. O. Box 12830, Pensacola, Florida 32575

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at Pensacola L. F. Hebert / sff
County, Escambia Signature of Permittee
this 27th day of November 19 90 Title Plant Manager
Jannette Spicer Date: 11-27-90
Notary Public

My Commission Expires: August 15, 1994

REQUEST FOR TRANSFER OF PERMIT

Source Name: Advanced Elastomer Systems, L.P.
Applicant Name: Robert E. Caison Title: Plant Manager
Mailing Address: 604 Chemstrand Road
Cantonment, FL 32533 Telephone: (904) 968-3901
area

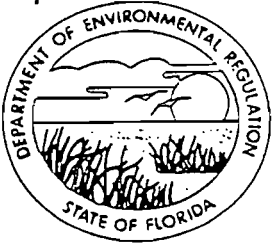
Project Engineer Name: _____
Mailing Address: _____
Telephone: ()
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. AC17-159577 was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Pensacola Robert E. Caison
County, Escambia Signature of Applicant
this 4 day of Jan 19 91 Title Plant Manager
Wanda Washington Date: 1/4/91
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: SEPT. 4, 1994.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

*Attach letter of authorization if other than owner or corporate officer.



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Lawton Chiles, Governor

January 24, 1991

Carol Browner, Secretary

cc
~~TODD~~
~~John Wiley~~
~~De 468 Mush~~
BC

Mr. R. E. Caison
Plant Manager
Advanced Elastomer Systems, L.P.
604 Chemstrand Road
Cantonment, Florida 32533

Dear Mr. Caison:

This is in response to your applications dated January 4 and your letter of January 16. By this letter Permits AC17-159577 and AC17-175045 are transferred from Monsanto Company to Advanced Elastomer Systems, L.P.

This letter shall be attached to and made a part of Permits AC17-159577 and AC17-175045.

Sincerely,

Robert V. Kriegel
Deputy Assistant Secretary

RVK/jpc

ADVANCED ELASTOMER SYSTEMS, L.P.
604 CHEMSTRAND ROAD 904-968-7129
CANTONMENT, FL 32533

0281

63-666/632

026
April 15, 1992

PAY TO THE
ORDER OF

Florida Department of Environmental Regulation

\$ 250.00

PAYED 250.00

DOLLARS



SUNSHINE BANK

PENSACOLA, FLORIDA 32503

[Handwritten Signature]
[Handwritten Signature]

FOR Permit Modifications

[Redacted area]

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

R.E. Caison Plant Mgr.
 Advanced Elastomer Sys, L.P.
 604 Chemstrand Rd
 Cantonment, FL
 32533

4a. Article Number

P 832 539 840

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

4/9/92

5. Signature (Addressee)

T Ernest a Miles

6. Signature (Agent)

P 832 539 840

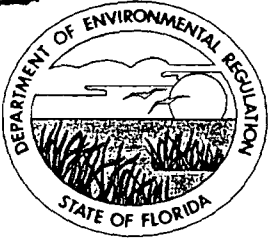


Certified Mail Receipt

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	R.E. Caison
Street & No.	Advanced Elastomer
P.O., State & ZIP Code	Cantonment, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark of Date	4-9-92
	AC 17-175045

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 3, 1992

Mr. R. E. Caison, Plant Manager
Advanced Elastomer Systems, L.P.
604 Chemstrand Road
Cantonment, Florida 32533

Dear Mr. Caison:

Re: Air Construction Permit No. AC 17-175045

This is in response to your March 24 letter objecting to the Method 5 test requirement in the subject permit. A mass emission limit (and consequently the Method 5 test) was demanded by Monsanto after the Department had proposed that only a visible emission test be required. The proper approach at this point would be to request that the permit be amended to reflect our original proposal. An amendment fee of \$250 will be required to make this change.

You requested an exemption from operation permit requirements on the basis of there being no visible emissions. Although no emissions are evident during normal operation, this would not be the case if a hole developed in the filter bag. Therefore, we have no reasonable basis on which to grant such an exemption. In the future, all questions concerning operation permits should be directed to the district office in Pensacola.

Since Advanced Elastomer Systems is a new company, it will be necessary to complete DER Form 17-1.201(1), transferring the permit from Monsanto to AES. I am sure you understand the legal reasons for this requirement. A fee of \$50 is required to make this change. The necessary form is enclosed.

If you have further questions about amendment of the construction permit, please contact John Reynolds, Permit Engineer, at 904-488-1344.

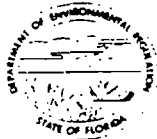
Sincerely,

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

CHF/JR/plm

Enclosure

c: E. Middleswart, NWD



STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL REGULATION
 APPLICATION FOR TRANSFER OF PERMIT

Permit No. _____ Date Issued _____ Date Expires _____

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: _____ County: _____
 Source Location: _____ City: _____
 Permittee Name: _____ Title: _____
 Mailing Address: _____

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at _____
 County, _____
 this _____ day of _____ 19 _____

 Signature of Permittee
 Title
 Date: _____
 Notary Public

My Commission Expires: _____

REQUEST FOR TRANSFER OF PERMIT

Source Name: _____
 Applicant Name: _____ Title: _____
 Mailing Address: _____
 _____ Telephone: (_____) _____
 area
 Project Engineer Name: _____
 Mailing Address: _____
 _____ Telephone: (_____) _____
 area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. _____ was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at _____
 County, _____
 this _____ day of _____ 19 _____

 Signature of Applicant*
 Title
 Date: _____
 Notary Public

My Commission Expires: _____

*Attach letter of authorization if other than owner or corporate officer.



**Advanced
Elastomer
Systems**

*Permit
EXEMPTION
REQUEST*

March 24, 1992

Advanced Elastomer Systems, L.P.
604 Chemstrand Road
Cantonment, Florida 32533
904-968-3900
FAX 904-968-3903

RECEIVED

MAR 26 1992

Mr. Clair H. Fancy
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Division of Air
Resources Management

Dear Mr. Fancy:

Permit AC17-175045 was issued to Monsanto and subsequently transferred to Advanced Elastomer Systems, L.P., (AES) upon formation of the AES company. This construction permit described a Santoprene fines removal system using air. The air with the Santoprene fines was to be filtered by a bag filter prior to discharge of the air to the atmosphere.

Based on experience gained by AES, it was learned that Santoprene fines are not effectively handled by bag filters because the fines tend to bridge over the filter and are not removed effectively by the backflow air pulse system employed to keep the bags clean.

The Santoprene fines collected are more accurately described as a "crumb" rather than particulate matter as defined in 17-2.100, (i.e.,...any airborne, finely divided solid or liquid material.).

Separation of the air and Santoprene fines is accomplished at this time by use of a woven bag, which captures the abraded material and allows the air to escape. A visible emissions test was performed on 3/18/92, showing no visible emissions at the bag. This VE test is attached for Department review. However, a Method 5 test is not possible because the bag is not enclosed and the air does not discharge via a stack.

It is our opinion that this unit is not a source of particulate matter emissions and that an operating permit should not be necessary for this particular operation. Therefore, AES requests that the Department review this installation and grant an exemption from operating permit requirements in conformance with 17-4.040(1)(b).

If you need further information or would like to set a time to inspect the unit in question, please call me at (904) 968-3901.

Sincerely,

R. E. Caison

R. E. Caison
Plant Manager

REC/lb
Attachments

cc: B. P. McLeod - Monsanto
Mr. Ed Middleswart - DER, Pensacola
J. T. Gummersbach - AES, Pensacola
D. D. Musch - AES, Wadsworth

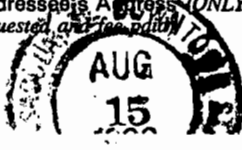
J. Reynolds

Visible Emissions Observation Form

Source/Process Information		Opacity Readings			
FACILITY NAME Monsanto Chemical Company		OBSERVATION DATE 3/18/92	START TIME 1312	STOP TIME 1342	
SOURCE NAME	PROCESS NO.	SEC MIN	SEC MIN	SEC MIN	SEC MIN
LOCATION/ADDRESS 3000 Old Chemstrand Rd., Cantonment, FL		1	0	0	0
CONTACT R. T. Cannon (904) 968-7770		2	0	0	0
PROCESS/PRODUCTION RATE		3	0	0	0
CONTROL EQUIPMENT		4	0	0	0
OPERATING MODE RUNNING		5	0	0	0
FUEL TYPE/RATE	MATERIAL TYPE/RATE	6	0	0	0
PERMITTED RATE		7	0	0	0
DESCRIBE EMISSION POINT EXPOSED FILTER BAG 3'SQUARE		8	0	0	0
HEIGHT ABOVE GROUND LEVEL 5 FT		9	0	0	0
HEIGHT RELATIVE TO OBSERVER'S EYE LEVEL 0 EYE LEVEL		10	0	0	0
Emissions Description		11	0	0	0
DESCRIBE EMISSIONS NO VISIBLE EMISSIONS		12	0	0	0
PLUME COLOR	PLUME TYPE	13	0	0	0
WATER DROPLETS PRESENT? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	IF YES, IS PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>	14	0	0	0
Meteorological Information		15	0	0	0
BACKGROUND BUILDING	BACKGROUND COLOR WHITE	16	0	0	0
SKY CONDITIONS/% CLOUD COVER 100% OVERCAST	AMBIENT TEMP.	17	0	0	0
WIND SPEED 10-12 MPH	WIND DIRECTION SE	18	0	0	0
Observation Data, Site Diagram		19	0	0	0
<p>Observed Emission Point</p> <p>Distance 8'</p> <p>Sun Shadow Line</p> <p>Observer's Position</p> <p>NO SUN VISIBLE</p> <p>Key: Sun ☉ Wind ↗</p>		20	0	0	0
		21	0	0	0
		22	0	0	0
		23	0	0	0
		24	0	0	0
		25	0	0	0
		26	0	0	0
		27	0	0	0
		28	0	0	0
		29	0	0	0
Compliance Information		Certification Data, Signatures			
RANGE OF OPACITY READINGS: MIN: MAX:		OBSERVER'S NAME Charles C. Doll			
AVERAGE OF HIGHEST 3 CONSECUTIVE READINGS		OBSERVER'S SIGNATURE Charles C. Doll		DATE 3/18/92	
SHORT TERM AVERAGE DATA: AVERAGING PERIOD _____ MINUTES ACTUAL AVERAGE _____		ORGANIZATION Monsanto Company			
COMMENTS:		CERTIFIED BY EPA & State of Florida		DATE 2/26/92	
		I HAVE RECEIVED A COPY OF THESE OBSERVATIONS: SIGNATURE		DATE	
		APIS NUMBER:			

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

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

3. Article Addressed to: <i>W.J. Board General Superintendent Govt. Affairs / Env. Health & Safety Monsanto Chem. Co. P.O. Box 12830 Pensacola, FL 32575</i>	4. Article Number <i>P 256 396 160</i>
5. Signature -- Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery <i>8/15/90</i>	8. Addressee's Address (ONLY if requested, and fee applies) 

PS Form 3871, Mar. 1988

* U.S.G.P.O. 1988-212-

DOMESTIC RETURN RECEIPT

P 256 396 160
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

U.S.G.P.O. 1988-234-555	Sent to <i>W.J. Board</i> Street and No. <i>Monsanto Chem. Co.</i> P.O., State and ZIP Code <i>P.O. Box 12830</i> Postage <i>Pensacola, FL</i> Certified Fee Special Delivery Fee Restricted Delivery Fee Return Receipt showing to whom and Date Delivered Return Receipt showing to whom, Date, and Address of Delivery TOTAL Postage and Fees \$ Postmark or Date <i>NO P 8-14-90</i> <i>AC 17-175045</i>
-------------------------	--

PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

Mr. W. J. Board
General Superintendent
Government Affairs/Environmental Health & Safety
Monsanto Chemical Company
P. O. Box 12830
Pensacola, Florida 32575


August 13, 1990

Enclosed is construction permit No. AC 17-175045 to install a compounded rubber fabric filter at the Gonzalez facility in Escambia County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copy furnished to:

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 8-14-90.

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

Kim Jaber
Clerk

8-14-90
Date

Final Determination

Monsanto Chemical Company
Escambia County
Gonzalez, Florida

Compounded Rubber Fabric Filter

Permit No. AC 17-175045

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

August 10, 1990

FINAL DETERMINATION

The construction permit application has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in the Pensacola News Journal on July 25, 1990. The Technical Evaluation and Preliminary Determination were available for public inspection at the Department's Northwest District office in Pensacola and the Bureau of Air Regulation in Tallahassee.

No comments were received during the public notice period. Therefore, the final action of the Department will be to issue the construction permit as drafted.



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Monsanto Chemical Company
3000 Old Chemstrand Road
Pensacola, Florida 32575

Permit Number: AC 17-175045
Expiration Date: June 30, 1992
County: Escambia
Project: Compounded Rubber
Fabric Filter

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

For the installation of a compounded rubber fabric filter. This project will be located at the applicant's facility in Gonzalez, Escambia County, Florida. The UTM coordinates of this site are Zone 15, 475.5 km E and 3,384.6 km N.

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

Attachment:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on March 9, 1990.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The compounded rubber fabric filter and associated equipment shall be allowed to operate for up to 8,760 hours per year.

3. Particulate matter emissions from the fabric filter shall not exceed 1.75 lbs/hr and 8.0 tons/yr. Compliance shall be demonstrated at 90-100% of capacity using EPA Method 5 in accordance with F.A.C. Rule 17-2.700.

4. Visible emissions from the fabric filter shall not be greater than 20% opacity and compliance shall be demonstrated at 90-100% of capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

5. The compliance tests shall be conducted within 30 days after operation begins and the results reported to the Department's Northwest District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the source being placed in operation. Compliance test results for particulate matter and visible emissions shall be submitted to the district office.

6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Monsanto Chemical Company

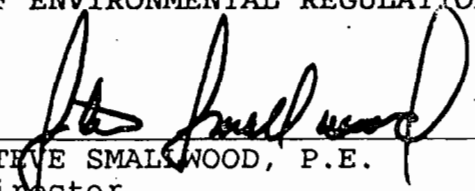
Permit Number: AC 17-175045
Expiration Date: June 30, 1992

SPECIFIC CONDITIONS:

7. An application for an operation permit must be submitted to the DER's Northwest office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 10th day
of August, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Steve Smallwood
FROM: Clair Fancy *CF*
DATE: August 10, 1990
SUBJ: Approval of Construction Permit No. AC 17-175045
Monsanto Chemical Company

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to install a compounded rubber fabric filter at their facility in Gonzales, Escambia County, Florida.

No comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is September 7, 1990.

I recommend your approval and signature.

CF/JR/plm

Attachments

Monsanto

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

RECEIVED

JUL 30 1990

DER-BAQM

VIA OVERNIGHT MAIL

July 27, 1990

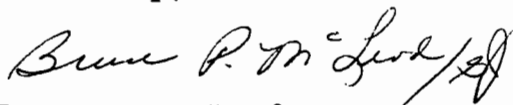
Mr. C. H. Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Attached is proof of publication of the public notice for construction permit AC17-175045, Compounded Rubber Fabric Filter.

Please issue this construction permit as soon as possible

Sincerely,



Bruce P. McLeod
Consultant
Environmental Regulatory Affairs

Attachment

cc: *J. Reynolds*
E. Middlewart

1902.BPM

PENSACOLA
**News
Journal**

PUBLISHED DAILY
PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,
County of Escambia.

Before the undersigned authority personally appeared

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

Intent to Issue,

_____ in the _____ Court,

was published in said newspaper in the issues of _____

July 25, 1990

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

Cindy Vance

Sworn to and subscribed before me this 26th
day of July, A.D., 19 90

Delly J. Fenton
NOTARY PUBLIC.

My Commission Expires October 26, 1991

LEGAL NOTICE LEGAL NOTICE LEGAL NOTICE LEGAL NOTICE LEGAL NOTICE LEGAL NOTICE

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

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Monsanto Chemical Company, 3000 Old Chemstrand Road, Gonzalez, Florida 32533, to install a compounded rubber fabric filter at their facility in Gonzalez, Escambia County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hear-

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

The petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and

the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of facts which Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner

wants the Department to take with respect to the

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

of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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

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

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

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication

of this notice will be considered in the Department's final determination.

Legal No. 38100 1T
July 25, 1990

Monsanto

RECEIVED
LAW DEPARTMENT

JUL 18 1990

DER. BAQ:m

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

July 13, 1990

VIA EXPRESS MAIL

Mr. Michael Donaldson
Assistant General Counsel
Office of General Counsel
Department of Environmental Regulation
Twin Towers Office Bldg.
2600 Blainstone Road
Tallahassee, FL 32399-2400

Re: Monsanto Company Time Extension Order OGC
Case No. 90-0861

Dear Mr. Donaldson:

This is to advise that on July 10, 1990, Monsanto received from the Department's Permits Group a permit modification which resolves the matter which formed the basis for Monsanto's planned appeal of permit No. AC17-175045. Monsanto intends to take no further action with regard to filing a permit appeal.

Thank you for your assistance in bringing this matter to a mutually satisfactory resolution.

Sincerely,



Peter H. Smith
Assistant Environmental Counsel

cc: ✓ C. H. Fancy, P.E.
B. P. McLeod, Monsanto, Pensacola

J. Reynolds
E. Middlewart

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

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

3. Article Addressed to: W.J. Beard, Gen. Supt. Gov't Affairs/Env. Health & Safety Monsanto Chem. Co. P.O. BOX 12830 Pensacola, FL 32575	4. Article Number P256396112
5. Signature - Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 7/11/90	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 256 396 112

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

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

Sent to	W.J. Beard
Street and No.	Monsanto Chem. Co.
P.O., State and ZIP Code	P.O. BOX 12830
Postage	Pensacola, FL
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	7-10-90
	AC17-175045

PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

July 10, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. W. J. Board
General Superintendent
Government Affairs/Environmental Health & Safety
Monsanto Chemical Company
P. O. Box 12830
Pensacola, Florida 32575

Dear Mr. Board:

Attached is one copy of the revised Technical Evaluation and Preliminary Determination and proposed permit for Monsanto to install a compounded rubber fabric filter at the Gonzalez facility.

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

Sincerely,

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

CHF/plm

Attachments

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

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Monsanto Chemical Company
3000 Old Chemstrand Road
Gonzalez, Florida 32533

DER File No. AC 17-175045

INTENT TO ISSUE

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

The applicant, Monsanto Chemical Company, applied on March 9, 1990, to the Department of Environmental Regulation for a permit to install a compounded rubber fabric filter at their facility in Gonzalez, Escambia County, Florida.

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

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

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

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

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

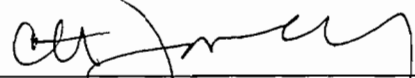
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

E. Middleswart, NW Dist.

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

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Monsanto Chemical Company, 3000 Old Chemstrand Road, Gonzalez, Florida 32533, to install a compounded rubber fabric filter at their facility in Gonzalez, Escambia County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

The Petition shall contain the following information;

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the

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

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

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

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

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

Revised Technical Evaluation
and
Preliminary Determination

Monsanto Chemical Company
Escambia County
Gonzalez, Florida

Compounded Rubber Fabric Filter

Permit No. AC 17-175045

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

July 10, 1990

I. Application

A. Applicant

Monsanto Chemical Company
Post Office Box 12830
Pensacola, Florida 32575-2830

B. Request

The Department received a complete application on March 9, 1990, for a permit to install a compounded rubber fabric filter at the applicant's facility in Gonzalez, Florida. The Department notified the applicant of its proposed permit conditions on May 11, 1990. On May 24, 1990, the applicant filed a request for an extension of time to file a petition for an administrative hearing, objecting to the Department's proposed permit condition requiring 5% opacity. The Department agreed to modify the proposed condition as requested by the applicant, imposing a mass emission limit and a visible emission limit of 20% opacity.

C. Location/Classification

The applicant's source (SIC Code 2822) is located at 3000 Old Chemstrand Road in Gonzalez, Florida. The UTM coordinates of the site are: Zone 15, 475.5 km E and 3,384.6 km N.

II. Project Description/Emissions

It is proposed to install a bag filter to collect compounded rubber fines from a rubber pellet elutriator. The elutriator fabric filter will discharge rubber fines to a hopper. Emissions of particulate matter (rubber fines) will be approximately 8 tons/year.

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for total suspended particulate. The applicable emission limits are set forth in F.A.C. Rule 17-2.610, General Particulate Emission Limiting Standards. The applicant has proposed a mass emission limit in addition to the visible emission standard.

IV. Conclusion

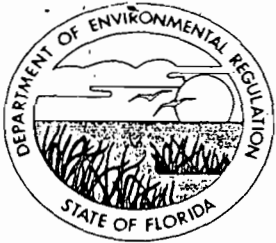
Based on the information provided by Monsanto Chemical Company, the Department has reasonable assurance that the proposed installation of the compounded rubber fabric filter, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of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

7/10/90
[Handwritten signature]

IV. Conclusion

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





Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Monsanto Chemical Company
3000 Old Chemstrand Road
Pensacola, Florida 32575

Permit Number: AC 17-175045
Expiration Date: June 30, 1992
County: Escambia
Project: Compounded Rubber
Fabric Filter

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

For the installation of a compounded rubber fabric filter. This project will be located at the applicant's facility in Gonzalez, Escambia County, Florida. The UTM coordinates of this site are Zone 15, 475.5 km E and 3,384.6 km N.

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

Attachment:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on March 9, 1990.

DRAFT

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

DRAFT

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

DRAFT

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

DRAFT

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

DRAFT

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

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

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. The compounded rubber fabric filter and associated equipment shall be allowed to operate for up to 8,760 hours per year.
3. Particulate matter emissions from the fabric filter shall not exceed 1.75 lbs/hr and 8.0 tons/yr. Compliance shall be demonstrated at 90-100% of capacity using EPA Method 5 in accordance with F.A.C. Rule 17-2.700.
4. Visible emissions from the fabric filter shall not be greater than 20% opacity and compliance shall be demonstrated at 90-100% of capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.
5. The initial compliance tests shall be conducted within 30 days after operation begins and the results reported to the Department's Northwest District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the source being placed in operation. Annual compliance test results for particulate matter and visible emissions shall be submitted to the district office.
6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

SPECIFIC CONDITIONS:

7. An application for an operation permit must be submitted to the DER's Northwest office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

DRAFT

Monsanto

RECEIVED

MAY 29 1990 DEPARTMENT

DER-BAQM

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

May 23, 1990

VIA EXPRESS MAIL

Mr. Michael Donaldson
Assistant General Counsel
Office of the General Counsel
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Monsanto Company
Request for Time Extension
Permit No. AC 17-175045

Dear Mr. Donaldson:

Confirming our telephone conversation today, I pointed out that the Request for Extension of Time to File Petition for Administrative Hearing enclosed with my letter to you of May 21, 1990, contained two incorrect references to a time extension until May 28, 1990. The references should instead read "until June 28, 1990." You agreed to the June 28, 1990 extension and said you would go forward to the Secretary with a recommendation to this effect.

Sincerely,


Peter H. Smith
Assistant Environmental Counsel

cc: Edwin Middleswart, P.E.
✓ Barry Andrews, DER, Tallahassee
David Schwartz, DER, Tallahassee
B. P. McLeod, Monsanto, Pensacola

Monsanto

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

RECEIVED

MAY 24 1990

DLR 5A...

May 17, 1990

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

Dear Mr. Andrews:

As discussed in our telephone conversation of May 17, 1990, Monsanto did not request the alternative 5 percent visible emission standard numbered as Specific Condition 3 in the Permit AC17-175045. This proposed permit transmitted with the Technical Evaluation and Preliminary Determination was received by Monsanto on May 14, 1990.

Please rewrite Specific Condition 3 in terms of the state standard of 20 percent visible emissions limit and a particulate emission rate limitation.

Thank you for your assistance. If you have any questions concerning this request, please contact me at 904-968-8725.

Sincerely,



B. P. McLeod
Consultant
Environmental Regulatory Affairs

c: J. G. Wiley, Monsanto, Pensacola
P. H. Smith, Monsanto, St. Louis

J. Reynolds
C. Middlewart
B. Andrews

1851.BPM

Monsanto

RECEIVED

LAW DEPARTMENT

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

MAY 24 1990

DER-BAQM

May 21, 1990

AIR EXPRESS

Mr. Michael Donaldson
Assistant General Counsel
Office of the General Counsel
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Monsanto Company
Request for Time Extension
Permit No. AC 17-175045

Dear Mr. Donaldson:

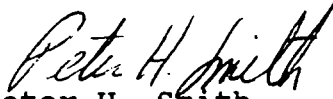
In accordance with a telephone conversation which I had on May 17, 1990, with David Schwartz of the Department, I am hereby filing on behalf of Monsanto Company the enclosed Request for Extension of Time to File Petition for Administrative Hearing. The above-referenced proposed permit was received by Monsanto on May 14, 1990, and the 14-day time period for filing an appeal runs out on or about May 28, 1990. While we believe that our objection to the permit has been resolved by oral discussion and negotiation, we do not want to lose the right to press for modification because of a failure to comply with procedural requirements if the agreed-upon change is not made.

As indicated in the certificate of service, copies of this request have also been served on the Northwest District Air Program Administrator and the Administrator, Permitting Section, Bureau of Air Regulation, in the Tallahassee office. Please note that the Tallahassee office issued the proposed permit.

Please contact me if you have any questions concerning this request.

Please indicate the receipt of this request by signing the enclosed copy of this letter.

Sincerely,



Peter H. Smith
Assistant Environmental Counsel

Enclosure

cc: Edwin Middleswart, P.E.
↳ Barry Andrews, DER, Tallahassee
David Schwartz, DER, Tallahassee
B. P. McLeod, Monsanto, Pensacola
J. Reynolds

bcc: R. H. Joslin

G4WS

RECEIVED BY _____

DATE _____

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of)	
)	Air Permit Number
MONSANTO COMPANY,)	
)	AC 17-175045
Petitioner)	

REQUEST FOR EXTENSION OF TIME TO
FILE PETITION FOR ADMINISTRATIVE HEARING

Monsanto Company, by its undersigned attorney and full-time employee and pursuant to Florida Administrative Code Rule 17-103.070, requests the Secretary of the Department of Environmental Regulation to grant a thirty (30) day extension of time (until May 28, 1990) for Petitioner to file a Petition for Administrative Hearing pursuant to Section 120.57 Florida Statutes in the above-captioned matter. In support of this request, Petitioner states as follows:

1. On or about March 9, 1990, Petitioner filed with the Department an application to install an air pollution source referred to as a compounded rubber fabric filter.

2. On May 14, 1990, Petitioner's Pensacola plant received from the Tallahassee Office of the Department a Technical Evaluation and Preliminary Determination and proposed air permit to install the compounded rubber fabric filter. The fourteen (14) day time period for filing an appeal runs out on or about May 28, 1990.

3. Since receipt of the permit on May 14, 1990, the plant has had discussions with Mr. Barry Andrews, Administrator, Permitting Section, Bureau of Air Regulation, to resolve the

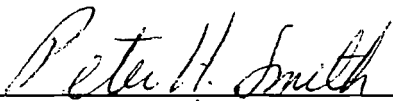
objection which Petitioner has with the permit, upon which Petitioner believes oral agreement resolving the matter has been reached.

4. Petitioner requires additional time to ensure that the agreed-upon change to the permit is issued as a permit modification, and it is not clear that this can be accomplished prior to May 28, 1990.

5. The undersigned has discussed with Mr. Schwartz, counsel with the Department, a thirty (30) day extension of time to petition for an administrative hearing and he has no objections to this extension.

6. Petitioner believes that granting this request will allow a sufficient period of time to resolve this matter and to avoid the time and expense of a formal hearing.

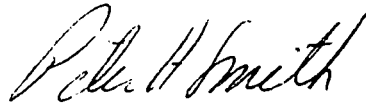
WHEREFORE, Petitioner respectfully requests that the Secretary grant its request to extend the time until May 28, 1990, to file a petition for an administrative hearing in this matter.



Peter H. Smith
Assistant Environmental Counsel
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167
314/694-8506

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been sent by U.S. Mail to Edwin Middleswart, P.E., Air Program Administrator, Northwest District, Department of Environmental Regulation, 160 Governmental Center, Pensacola, Florida 32501-5794, and to Barry Andrews, Administrator, Permitting Section, Bureau of Air Regulation, and Michael Donaldson and David Schwartz, Assistant General Counsels, Office of the General Counsel, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, this 21st day of May, 1990.

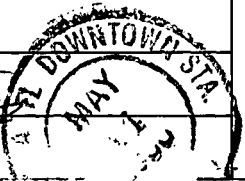


Peter H. Smith

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

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

3. Article Addressed to: W.J. Board Monsanto Chemical Co. P.O. Box 12830 Pensacola, FL 32575	4. Article Number P052 482 254 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature Agent X <i>Bob Putney</i>	
7. Date of Delivery	

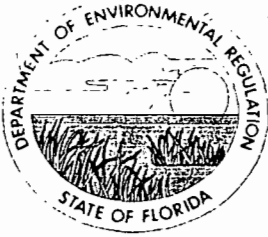


PS Form 3800, June 1985 2-865 DOMESTIC RETURN RECEIPT

P 052 482 254
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to		<i>W.J. Board</i>	
Street and No.		<i>Monsanto</i>	
P.O. Box		<i>12830</i>	
State and ZIP Code		<i>Pensacola, FL</i>	
Postage		\$	
Certified Fee			
Special Delivery Fee			
Restricted Delivery Fee			
Return Receipt showing to whom and Date Delivered			
Return Receipt showing to whom, Date, and Address of Delivery			
TOTAL Postage and Fees		\$	
Postmark or Date <i>5-11-90</i>			

PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

May 11, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. W. J. Board
General Superintendent
Government Affairs/Environmental Health & Safety
Monsanto Chemical Company
P. O. Box 12830
Pensacola, Florida 32575

Dear Mr. Board:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Monsanto to install a compounded rubber fabric filter at the Gonzalez facility.

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

Sincerely,

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

CHF/plm

Attachments

c: E. Middleswart, NW Dist.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Monsanto Chemical Company
3000 Old Chemstrand Road
Gonzalez, Florida 32533

DER File No. AC 17-175045

INTENT TO ISSUE

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

The applicant, Monsanto Chemical Company, applied on March 9, 1990, to the Department of Environmental Regulation for a permit to install a compounded rubber fabric filter at their facility in Gonzalez, Escambia County, Florida.

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

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

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

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

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

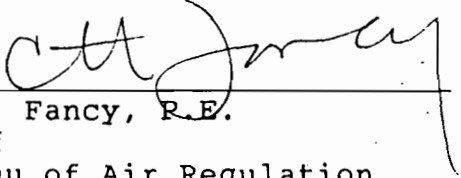
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

E. Middleswart, NW Dist.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 5-11-90.

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

Kim J. J. J.
Clerk

5-11-90
Date

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

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Monsanto Chemical Company, 3000 Old Chemstrand Road, Gonzalez, Florida 32533, to install a compounded rubber fabric filter at their facility in Gonzalez, Escambia County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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

The Petition shall contain the following information;

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the

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

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

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

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

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

Technical Evaluation
and
Preliminary Determination

Monsanto Chemical Company
Escambia County
Gonzalez, Florida

Compounded Rubber Fabric Filter

Permit No. AC 17-175045

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

May 11, 1990

I. Application

A. Applicant

Monsanto Chemical Company
Post Office Box 12830
Pensacola, Florida 32575-2830

B. Request

The Department received a complete application on March 9, 1990, for a permit to install a compounded rubber fabric filter at the applicant's facility in Gonzalez, Florida.

C. Location/Classification

The applicant's source (SIC Code 2822) is located at 3000 Old Chemstrand Road in Gonzalez, Florida. The UTM coordinates of the site are: Zone 15, 475.5 km E and 3,384.6 km N.

II. Project Description/Emissions

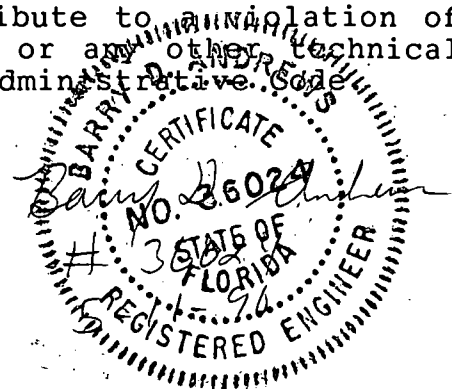
It is proposed to install a bag filter to collect compounded rubber fines from a rubber pellet elutriator. The elutriator fabric filter will discharge rubber fines to a hopper. Emissions of particulate matter (rubber fines) will be approximately 8 tons/year.

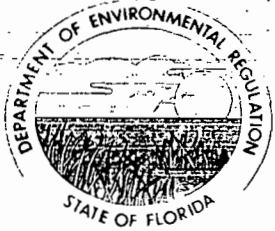
III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for total suspended particulate. The applicable mass emission limit is set forth in F.A.C. Rule 17-2.610(1), General Particulate Emission Limiting Standards. However, rather than applying a mass emission limit and requiring a Method 5 compliance test, an alternate standard of 5 percent opacity will be specified in the permit in accordance with F.A.C. Rule 17-2.700(3)(d).

IV. Conclusion

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





Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Monsanto Chemical Company
3000 Old Chemstrand Road
Pensacola, Florida 32575

Permit Number: AC 17-175045
Expiration Date: June 30, 1992
County: Escambia
Project: Compounded Rubber
Fabric Filter

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

For the installation of a compounded rubber fabric filter. This project will be located at the applicant's facility in Gonzalez, Escambia County, Florida. The UTM coordinates of this site are Zone 15, 475.5 km E and 3,384.6 km N.

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

Attachment:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on March 9, 1990.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

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

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

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

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

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

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. The compounded rubber fabric filter and associated equipment shall be allowed to operate for up to 8,760 hours per year.
3. Visible emissions from the baghouse shall not be greater than 5% opacity and compliance shall be demonstrated at 90-100% of capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.
4. The compliance test shall be conducted within 30 days after operation begins and the results reported to the Department's Northwest District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the source being placed in operation.
5. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Monsanto Chemical Company

Permit Number: AC 17-175045
Expiration Date: June 30, 1992

SPECIFIC CONDITIONS:

6. An application for an operation permit must be submitted to the DER's Northwest office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Monsanto

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

RECEIVED
MAR 9 1990
DER-BAQ

March 7, 1990

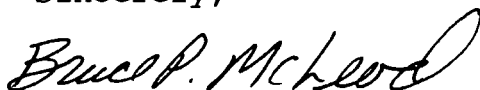
Mr. C. H. Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Enclosed is the additional information requested in your February 16 letter to W. J. Board construction permit AC17-175045 for a Compounded Rubber Fines Removal System.

If there are any questions, I can be reached at 904/968-8725.

Sincerely,



B. P. McLeod
Consultant
Environmental Control

Enclosures

cc: *q. Reynolds*
g. Pierce
CHF/JRP/BT

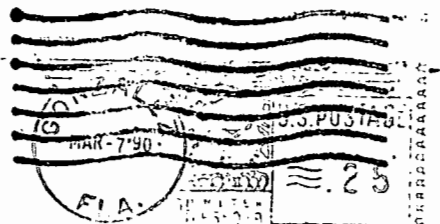
1799.BPM-1

Monsanto

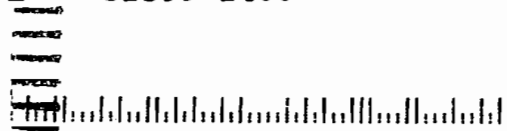
MONSANTO COMPANY

P. O. Box 12830

Pensacola, Florida 32575



MR C H FANCY P E
BUREAU OF AIR QUALITY MANAGEMENT
DEPARTMENT OF ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400



Comment 1) Authorization letter

Attached

Comment 2) Site Coordinates

Based upon the direction of the Northwest District office site coordinates are submitted.

UTM: East zone 16, 476 km
UTM: North zone 16, 3385 km
Latitude 30° 35' 56" N
Longitude 87° 15' 01" W

These coordinates are meant to represent the Monsanto, Pensacola, Florida, site as a whole.

They will be used for this permit and for future new permits and renewals.

These UTM coordinates supersede those contained in the original construction permit transmittal.

Comment 3 See Confidential attachment

Monsanto

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

March 1, 1990

SIGNATURE AUTHORIZATION FOR ENVIRONMENTAL PERMIT PROGRAM FORMS

The General Superintendent, Governmental Affairs, of
Monsanto's Pensacola Plant, is hereby authorized to sign permit
applications, reports, and other documents required or requested
by government environmental authorities.



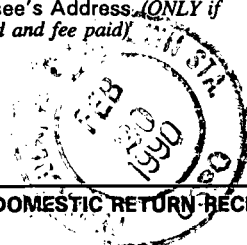
L. F. Hebert
Plant Manager

LFH42

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

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

3. Article Addressed to: Mr. W. J. Board General Superintendent Governmental Affairs/Env. Health Monsanto Chemical Company P. O. Box 12830 Pensacola, FL 32575	4. Article Number P 938 762 835
5. Signature - Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery 2/20/90	



PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 938 762 835

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

Sent to Mr. W. J. Board, Monsanto	
Street and No. P.O. Box 12830	
P.O., State and ZIP Code Pensacola, FL 32575	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 02-16-90 Permit: AC 17-175045	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

February 16, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. J. Board
General Superintendent
Government Affairs/Environmental Health & Safety
Monsanto Chemical Company
Post Office Box 12830
Pensacola, Florida 32575

Dear Mr. Board:

Re: Permit Application for Compounded Rubber Bag Filter
AC 17-175045

This is to provide notice that the following additional information is required for preliminary review of the above application received on January 17, 1990:

1. Letter of authorization for signature (page 1).
2. Exact latitude and longitude of site (page 1).
3. Utilization, process and product rates (page 4).

This additional information is required in order to process your application. If you have any questions, please call John Reynolds at (904) 488-1344 or write to me at the above address.

Sincerely,

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

CHF/JR/plm

c: Ed Middleswart, NW District

Monsanto

RECEIVED
DER - MAIL ROOM
1990 JAN 17 AM 10:43

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

January 10, 1990

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

Dear Mr. Fancy:

Enclosed are four copies of a construction permit application for a Compounded Rubber Fines Removal System.

If there are any questions, I can be reached at 904/968-8725.

Sincerely,



B. P. McLeod
Consultant
Environmental Control

Enclosures (4)

cc: J. Preece, NW Dist.

1031

1760.BPM

Monsanto

WORKING FUND ACCOUNT
MONSANTO COMPANY
PENSACOLA, FLORIDA

72013100

62-20
311

PAY
EXACTLY **2000.00** DOLLARS

01/12/90

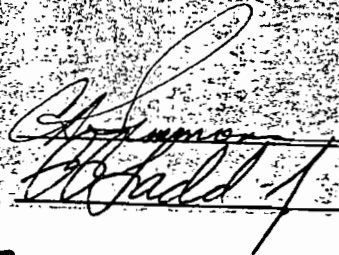
\$200.00

001
0:43

PAY
TO THE
ORDER
OF

DEPARTMENT OF ENVIRONMENTAL REGULATION

Citibank (Delaware)



January 10, 1990

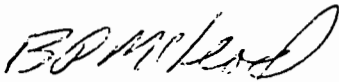
Mr. C. H. Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Enclosed are four copies of a construction permit application for a Compounded Rubber Fines Removal System.

If there are any questions, I can be reached at 904/968-8725.

Sincerely,



B. P. McLeod
Consultant
Environmental Control

Enclosures (4)

1031

1760.BPM

\$300.00 pd.
1-17-90
Receipt # 117691

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



NORTHWEST DISTRICT
160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

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

AC 17-175045

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution New¹ Existing¹
APPLICATION TYPE: Construction Operation Modification
COMPANY NAME: Monsanto Company COUNTY: Escambia

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2. Gas Fired) Compounded Rubber Bag Filter

SOURCE LOCATION: Street 3000 Old Chemstrand Road City Gonzalez, FL 32533
(APPROXIMATELY) UTM: East Zone 15,475.5 km North 3384.6 km
Latitude ° ' "N Longitude ° ' "W

APPLICANT NAME AND TITLE: W. J. Board, Gen. Supt., Gov. Affairs/Env. Health & Safety
APPLICANT ADDRESS: P. O. Box 12830, Pensacola, FL 32575

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

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

*Attach letter of authorization

Signed: WJ Board
W. J. Board, Gen. Supt., Gov. Affairs/Env. Health & Safety
Name and Title (Please Type)
Date: 1/11/90 Telephone No. 904/968-7350

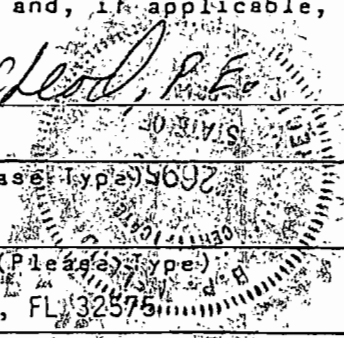
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

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) 5692
Monsanto Company
Company Name (Please Type)
P. O. Box 12830, Pensacola, FL 32575
Mailing Address (Please Type)



Florida Registration No. 26956 Date: 11/9/90 Telephone No. 904/968-8725

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Installation of a bag filter to collect compounded rubber fines

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction upon permit receipt Completion of Construction 24 mos. after permit receipt

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 Filter \$15,000

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

A017- 113404

AC17- 159577

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

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

- | | |
|---|-----|
| 1. Is this source in a non-attainment area for a particular pollutant? | No |
| a. If yes, has "offset" been applied? | N/A |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | N/A |
| c. If yes, list non-attainment pollutants. _____ | N/A |
| 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. | No |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. | No |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? | No |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? | No |
| H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? | No |
| a. If yes, for what pollutants? _____ | N/A |
| 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		
Compounded	N/A		N/A	
Rubber Pellets				

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

- Total Process Input Rate (lbs/hr): N/A
- Product Weight (lbs/hr): N/A

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 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	1.75	8.0	N/A	N/A	N/A		1

¹See Section V, Item 2.

²Reference 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)

³Calculated from operating rate and applicable standard.

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

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)
Flex-Clean Bag Filter	particulate	95+%	N/A	Nominal
Filter Area				Bag Filter
approximately				Efficiency
1500 sq. ft.				
(or equivalent)				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

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

Annual Average _____ Maximum _____

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

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

Stack Height: approximately 25 ft. Stack Diameter: 1.33 (16") ft.
 Gas Flow Rate: 7000 (approx) 7000 DSCFM Gas Exit Temperature: ambient °F.
 Water Vapor Content: ambient % Velocity: 84 approx. FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated	NOT APPLICABLE						
Uncontrolled (lbs/hr)							

Description of Waste _____

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

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

Manufacturer _____

Date Constructed _____ Model No. _____

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

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

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

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

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

Brief description of operating characteristics of control devices: _____

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.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

NOT APPLICABLE

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

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

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

1.

- a. Control 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:

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:

¹Explain method of determining efficiency.

²Energy 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:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

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

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ 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).

MONSANTO PENSACOLA
CALCULATION OF PARTICULATE EMISSIONS

$$\frac{7000 \text{ ft}^3}{\text{min.}} \times \frac{60 \text{ min.}}{\text{hr}} \times \frac{0.03 \text{ grain}^*}{\text{ft}^3} \times \frac{1 \text{ lb}}{7000 \text{ grains}} = \frac{1.75 \text{ lb}}{\text{hr}}$$

$$\frac{0.9 \text{ lb}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs.}} = \frac{8.0 \text{ tons}}{\text{yr}}$$

*Emission based on nominal bag filter emission rate of 0.03 grains per standard cubic foot of air flow exhausted.

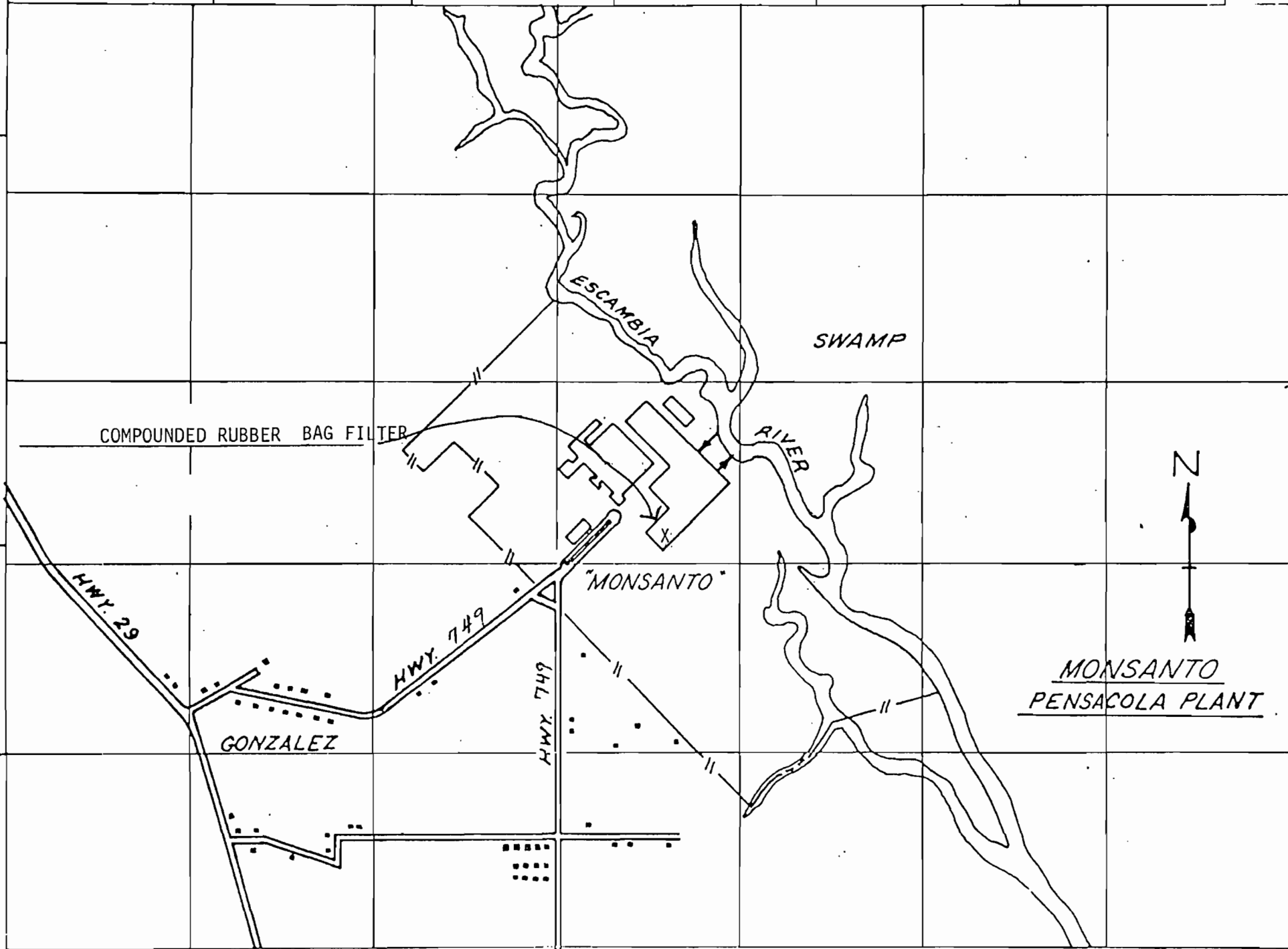
87°18'

87°15'

87°12'

30°37'

30°34'



MONSANTO
PENSACOLA PLANT

