

Check Sheet

Company Name:  
Permit Number:  
PSD Number:  
Permit Engineer:

*Olin Corporation*  
*AC 165-140731*

Cross References:

- 
- 
- 

**Application:**

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

**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

**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. Dick Myers Manager Environmental Control Olin Corporation P. O. Box 222 St. Marks, FL 32355	4. Article Number P 274 010 407
5. Signature Address X <i>[Signature]</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature Agent X 7. Date of Delivery 4/25/89	8. Addressee's Address (ONLY if requested and fee paid)

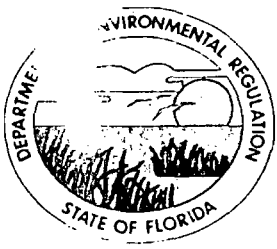
PS Form 3811, Mar. 1988    \* U.S.G.P.O. 1988-212-865    DOMESTIC RETURN RECEIPT

P 274 010 407

**RECEIPT FOR CERTIFIED MAIL**

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

PS Form 3800, June 1985 * U.S.G.P.O. 1985-480-794	Sent to Mr. Dick Myers, Olin Corp.	
	Street and No. P.O. Box 222	
	P.O., State and ZIP Code St. Marks, FL 32355	
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	
	Return Receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
Postmark or Date Mailed: 4-21-89 Permit: AC 65-140731		



## 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

April 17, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dick Myers  
Manager Environmental Control  
Olin Corporation  
Post Office Box 222  
St. Marks, Florida 32355

Dear Mr. Myers:

Re: Permit No. AC 65-140731, North Sweetie Barrell Scrubber with Exhaust Blower

This letter is to confirm your March 7, 1989 telephone conversation with Mr. Bill Thomas, Chief Engineer for the New Source Review Section. Your request for using EPA test Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, to comply with specific permit condition No. 2 of the subject permit is approved.

Specific Condition No. 2 will be changed as follows:

From:

Compliance with VOC standard will be determined by Method 25 or other method approved by the Department. Concentration data and calculated mass emission rate will be reported to the Northwest District. Thereafter, compliance with the VOC emission limitations will be maintained based on the monitoring and recording of the scrubber water flow rate previously established during the initial compliance tests. The district office shall be notified 15 days prior to the test.

To:

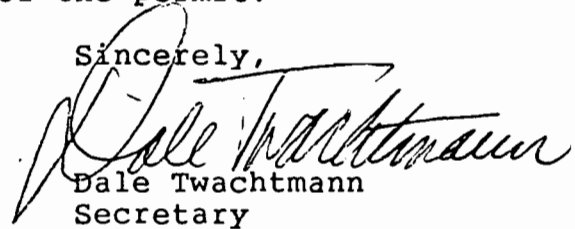
Compliance with the VOC standard will be determined by EPA Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, or other methods only if approved by the Department. Concentration data and calculated mass emission rate will be reported to the Northwest District. Thereafter,

Mr. Dick Myers  
Page Two  
April 17, 1989

compliance with the VOC emission limitations will be maintained based on the monitoring and recording of the scrubber water flow rate previously established during the initial compliance tests. The district office shall be notified at least 15 days prior to the test.

A copy of this letter shall be attached to your permit AC 65-140731 and shall become a part of the permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dale Twachtmann".

Dale Twachtmann  
Secretary

DT/ks

cc: J. Preece, NW District



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

# Interoffice Memorandum

RECEIVED

APR 17 1989

Office of the Secretary

TO: Dale Twachtmann

FROM: Steve Smallwood *[Signature]*

DATE: April 17, 1989

SUBJ: Modification of AC 65-140731  
North Sweetie Barrel Scrubber with Exhaust Blower  
Olin Corporation

Attached for your approval and signature is a letter to modify the construction permit for the above mentioned company.

This modification is not controversial and I recommend your approval.

SS/TH/s

attachments

RECEIVED

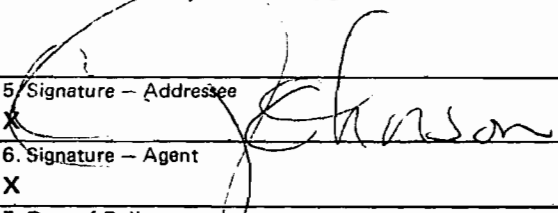
APR 20 1989

DER - BAQM

*Please call  
Patty Adams  
when signed  
8-1344*

**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.

<b>3. Article Addressed to:</b> Mr. D.E. Findley, Director St. Marks Operation P.O. Box 222 St. Marks, FL 32355	<b>4. Article Number</b> P 274 010 463  <b>Type of Service:</b> <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail  Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>
<b>5. Signature - Addressee</b> 	<b>8. Addressee's Address (ONLY if requested and fee paid)</b>
<b>6. Signature - Agent</b> X	
<b>7. Date of Delivery</b> 1/28/88	

PS Form 3811, Feb. 1986

**DOMESTIC RETURN RECEIPT**

P 274 010 463

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

\* U.S.G.P.O. 1985-480-794  
  
 PS Form 3800, June 1985

Sent to D.E. Findley, Director	
<del>Olin Corporation</del>	
Street and No. P.O. Box 222	
P.O., State and ZIP Code St. Marks, FL 32355	
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: 01/27/88	
Permit: AC 65-140731	

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. D. E. Findley, Director  
St. Marks Operation  
Olin Corporation  
Post Office Box 222  
St. Marks, Florida 32355

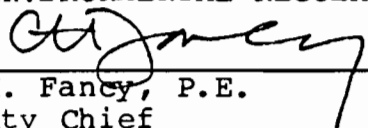
January 27, 1988

Enclosed is permit No. AC 65-140731, for the Olin Corporation to construct a BESCO Multi-Micro Venturi Scrubber in series with a second stage packed column at the facility's location in St. Marks, Wakulla County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

E. Middleswart, NW Dist.  
A. F. McElfresh, P.E.

Final Determination

Olin Corporation  
Wakulla County

North Sweetie Barrel-Scrubber with Exhaust Blower

Permit No. AC 65-140731  
APIS No. 10TLH65000301

Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting  
New Source Review Section

January 20, 1988



## Final Determination

Olin Corporation's application for a permit to construct a BECO Multi-Micro Venturi Scrubber in series with a second stage packed column has been reviewed by the Bureau of Air Quality Management. Olin Corporation's facility is located in St. Marks, Wakulla County, Florida.

Public Notice of the Department's Intent to Issue the construction permit was published in the Tallahassee Democrat on December 10, 1987.

Comments were received from Jack Preece, Engineer, NW District Office. Mr. Preece requested that the permit be modified as per his memo of December 11, 1987.

The Bureau has considered his request and the Specific Conditions No. 2 and No. 7 are changed as follows:

### Specific Condition No. 2

From:

Compliance with the VOC emission standard will be determined by Method 25 or other methods approved by the Department. Concentration data and calculated mass emission rate will be reported. Thereafter, compliance with the VOC emission limitations will be maintained based on the VOC inventory. The District office shall be notified 15 days prior to test.

To:

Compliance with VOC standard will be determined by Method 25 or other method approved by the Department. Concentration data and calculated mass emission rate will be reported to the Northwest District. Thereafter, compliance with the VOC emission limitations will be maintained based on the monitoring and recording of the scrubber water flow rate previously established during initial compliance tests. The district office shall be notified 15 days prior to test.

### Specific Condition No. 7

From:

Upon obtaining an operating permit, the permittee will be required to submit annual reports on the actual operation and emissions of the facility. Annual material balance reports (24-hour) shall be required and sent to the Department's district office to assess emissions and maintain VOC inventory. Visible emissions test shall be performed on an annual basis.

To:

Upon obtaining an operating permit, the permittee will be required to submit annual reports on the actual operation and emissions of the facility. The scrubber water flow rate data shall be monitored and recorded. This data must be based on written operation and maintenance instructions and logs.

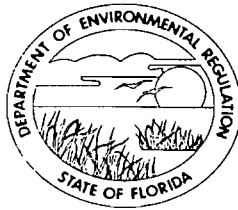
The final action of the Department will be to issue the permit with the changes described above.

Attachment

Mr. Jack Preece's memo of December 11, 1987.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
Olin Corporation  
P. O. Box 222  
St. Marks, Florida 32355

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989  
County: Wakulla  
Latitude/Longitude: 30° 10' 48"N/  
84° 13' 24" W  
Project: Installation of a North  
Sweetie Barrel with Exhaust Blower

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

For the construction/installation of BECO Multi-Micro Venturi Scrubber in series with a second stage packed column to be located at the Olin Corporation Complex, in St. Marks, Wakulla County, Florida.

Attachments:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16) dated October 13, 1987.
2. Mr. Jack Preece's memo of December 11, 1987.

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

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

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

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

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

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

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

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

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

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

**SPECIFIC CONDITIONS:**

1. Total volatile organic emissions (VOC) from this source shall not exceed 13.5 lbs/hr and 21.4 tons/year.

2. Compliance with VOC standard will be determined by Method 25 or other method approved by the Department. Concentration data and calculated mass emission rate will be reported to the Northwest District. Thereafter, compliance with the VOC emission limitations will be maintained based on the monitoring and recording of the scrubber water flow rate previously established during initial compliance tests. The district office shall be notified 15 days prior to test.

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

SPECIFIC CONDITIONS:

3. No objectionable odors are allowed from this facility.
4. This permit replaces current operation permit No. AO 65-79867.
5. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration date of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-4.09 Florida Administrative Code)
6. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4.22 and 17-4.23, Florida Administrative Code.)
7. Upon obtaining an operating permit, the permittee will be required to submit annual reports on the actual operation and emissions of the facility. The scrubber water flow rate data shall be monitored and recorded. This data must be based on written operation and maintenance instructions and logs.
8. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4.10 Florida Administrative Code)

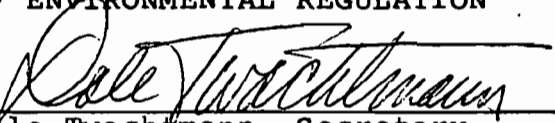


PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

Issued this 25 day of Jan,  
1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary



# Interoffice Memorandum

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

TO: Dale Twachtmann  
THRU: Howard Rhodes *HR*  
FROM: Clair Fancy *CF*  
DATE: January 19, 1988  
SUBJ: Approval of Olin Corporation  
State Construction Permit Number: AC 65-140731

**RECEIVED**

JAN 25 1988

Office of the Secretary

Attached for your approval and signature is a permit for the above mentioned company to construct a BESCO Multi-Micro Venturi Scrubber in series with a second stage packed column at the facility's location in St. Marks, Wakulla County, Florida. Comments were received during the public notice period.

Day 90 after which these permits will be issued by default is February 10, 1988.

The Bureau recommends approval and signature.

CHF/MJ/s

attachments

DER  
JAN 27  
BAOM



PM  
1-21-88  
St. Marks, FL

File Copy

January 21, 1988

ST. MARKS OPERATIONS

DER

JAN 25, 1988

BAQM

Mr. Claire Fancy, P.E.  
Bureau of Air Quality Management  
State of FL, Dept. of Env. Regulation  
Twin Towers Office Building  
2600 Blainstone Road  
Tallahassee, Florida 32301-8241

RE: SIC Code Classifications for Olin's St. Marks, Florida Operation

Dear Mr. Fancy:

In your letter of December 3, 1987, you state that FDER files indicate our entire operation is classified in Major Group 28, Chemical and Allied Products, of the SIC Code. Olin feels this is not a totally correct classification. Our plant is a chemical complex in which several operating facilities are located. In addition we have support facilities providing utilities such as compressed air, drinking water, and steam. The steam boilers are the only support facility requiring an Air Operations Permit, and we feel it should fall under a different SIC Code.

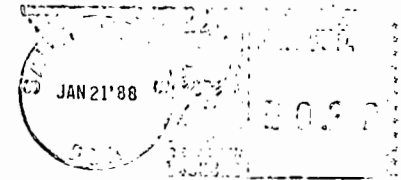
The following is a listing of our current different facilities along with our recommended SIC Code and comments:

<u>Facility</u>	<u>SIC Code</u>	<u>Comments</u>
1. BALL POWDER Facility	2892	Major Group 28 is one of the 28 major facilities categories listed in Chapter 17-2, FAC, Table 500-1. (100 ton per year major facility.)
2. Combustible Cartridge Facility (Initial Production Facility)	2892	Major Group 28 is one of the 28 major facilities categories listed in Chapter 17-2, FAC, Table 500-1. (100 ton per year major facility.)
3. Boiler Facility	4961	This is <u>not</u> one of the 28 major facilities categories because the facility is a fossil fuel boiler plant totaling less than 250,000,000 BTU/hr. (250 ton per year facility.)

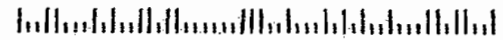


St. Marks, Florida 32355

1-26-88  
~~CAF~~: > FYI  
~~BT~~:  
②



Mr. Claire Fancy, P.E.  
Bureau of Air Quality Management  
State of FL, Dept. of Env. Regulation  
Twin Towers Office Building  
2600 Blainstone Road  
Tallahassee, FL 32301-8241

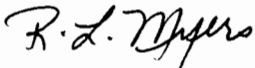


Mr. Claire Fancy, P.E.  
January 21, 1988  
Page Two

We have also attached a sheet indicating the individual facilities at St. Marks requiring air permits and the regulating agency.

Please review our recommendations for the correct SIC classification of each facility in the Olin St. Marks chemical complex and revise the existing classification accordingly if you agree with our assessment.

Sincerely,



R. L. Myers  
Manager, Environmental Control

RLM/WGC/jah

Attachment

cc: Mr. Jack Preece  
State of Florida  
Dept. of Environmental Regulation  
Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

Copied: Teresa Nixon  
CHF/BT

<u>FACILITY</u>	<u>GOVERNING REGULATIONS</u>	<u>PERMIT NUMBER</u>	<u>POLLUTANTS</u>	<u>EMISSIONS</u>
1. BALL POWDER Facility				
- North Sweetie Barrel Exhaust	FDER	A065-114702 (Existing Operating Permit)	VOC	8.2
		AC65-140731 (Pending Construction Permit - Minor Mods.)	VOC	21.4
- North Coater Exhaust	FDER	A065-136175 (Existing Operating Permit)	VOC	18.0
- Mixing Ventilation System	FDER	A065-114702 (Existing Operating Permit)	VOC	-
2. Combustible Cartridge Case Facility (Initial Production Facility)	FDER	A065-136176 (Existing Operating Permit)	VOC	12.2
3. Steam Plant or Boiler Facility	FDER	A065-113388 (Existing Operating Permit)	Sulfur Dioxide	245.0

**DER**

JAN 25

**BAQM**

*See Copy*



**ST. MARKS OPERATIONS**

December 16, 1987

Mr. C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Dept. of Environmental Regulation  
2600 Blainstone Road  
Tallahassee, Florida 32301-8241

Re: Permit No. AC-65-140731, APIS No. 10TLH65000301

Dear Mr. Fancy:

The public notice of FDER's Notice of Intent to issue the subject permit was published December 10, 1987 in the Tallahassee Democrat. Proof of that publication is enclosed and is being forwarded to you prior to the required seven days after publication.

Sincerely,

*D. E. Findley / [Signature]*

D. E. Findley, Director  
St. Marks Operations

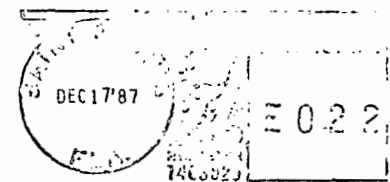
DEF/RLM/jah  
*RLM*

Enclosure

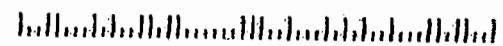
**DER**  
**DEC 18 1987**  
**BAQM**



St. Marks, Florida 32355



Mr. C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Dept. of Environmental Regulation  
2600 Blairstone Road  
Tallahassee, FL 32301-8241





OL

# Tallahassee Democrat

## PUBLISHED DAILY

### TALLAHASSEE - LEON - FLORIDA

**STATE OF FLORIDA  
COUNTY OF LEON:**

Before the undersigned authority personally appeared Linda Weinberg who on oath says that she is Legal Control Clerk of the Tallahassee Democrat, a daily newspaper published at Tallahassee in Leon County, Florida; that the attached copy of advertising being a Legal Ad in the matter of

State of Florida  
Department of Environmental  
Regulation...

in the Court, was published in said newspaper in the issues of:

December 10, 1987

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

*Linda Weinberg*

Linda Weinberg, Legal Control Clerk

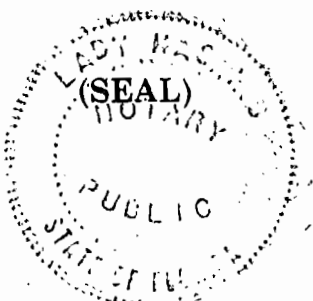
Sworn To And Subscribed Before Me  
This 15

Day of December

A.D. 1987

*Lady Perkins*  
Notary Public

Notary Public, State of Florida  
My Commission Expires Sept. 27, 1988  
Bonded thru Troy Rain Insurance Inc.



Copied: Ed Middleswart - NW Dist, }  
Teresa Heron } 12.28.87 (ms)

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department gives notice of its intent to issue a permit to Olin Corporation for the construction/installation of BECO Multi-Micro Venturi Scrubber in series with a second stage packed column to be located at the Olin Corporation Complex in St. Marks, Wakulla County, Florida.

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

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

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

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

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

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

December 10, 1987

Ad No. C8640050

*Inter Office  
Mail*

*True copy*



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

# Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
To: _____	LOCTN: _____
To: _____	LOCTN: _____
To: _____	LOCTN: _____
FROM: _____	DATE: _____

TO: Clair Fancy  
 FROM: Jack Preece *JP*  
 DATE: December 11, 1987  
 SUBJECT: Comments on DRAFT Permit AC65-140731

I object to the third sentence of Specific Condition 2 and the last two sentences of Specific Condition 7. Please consider striking these sentences.

Verifying VOC emissions limitations based upon VOC inventory and material balance reports (24-hour) would be very difficult for the permittee and impossible for the district office to verify. It is suggested that surrogate parameters such as scrubber water flow rate shall be established during initial compliance testing. The monitoring and recording of surrogate parameter data should be established by written operation and maintenance instructions and logs.

Annual visible emissions tests have no purpose without a standard. Particulate emissions would be expected to be negligible, IPA emissions invisible and water emissions may be visible but non-polluting.

JP/jpl

cc: Mr. D. E. Findley - Olin

*Copied: CHF-BT }  
Teresa Nixon } 12.23.87 *(initials)**

**DER**  
DEC 22 1987  
**BAQM**

12-23-87

~~CHF~~  
~~BE~~ } FYI

(M)

P 274 007 641  
**RECEIPT FOR CERTIFIED MAIL**

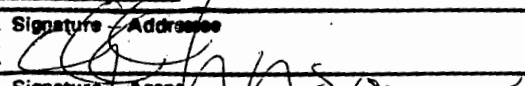
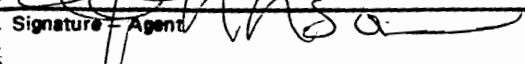
NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

U.S.G.P.O. 1985-480-794

Mr. Dick Myers, Manager Olin Ordinance Corporation	
Street and No. P.O. Box 222	
P.O., State and ZIP Code St. Marks, FL 32355	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 12/7/87 Permit: AC 65-140731	

PS Form 3800, June 1985

PS Form 3811, July 1983 447-845

<p><b>SENDER: Complete items 1, 2, 3 and 4.</b></p> <p>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. <u>The return receipt fee will provide you the name of the person delivered to and the date of delivery.</u> For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.</p>	
<p>1. <input checked="" type="checkbox"/> Show to whom, date and address of delivery.</p> <p>2. <input type="checkbox"/> Restricted Delivery.</p>	
<p>3. Article Addressed to: Dick Myers                  Manager Environmental Control                  Olin Ordinance Corporation                  Post Office Box 222                  St. Marks, FL 32355</p>	
<p>4. Type of Service:</p> <p><input type="checkbox"/> Registered    <input type="checkbox"/> Insured  <input checked="" type="checkbox"/> Certified    <input type="checkbox"/> COD  <input type="checkbox"/> Express Mail</p>	<p>Article Number                  P 274 007 641</p>
<p>Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b></p>	
<p>5. Signature - Addressee                  X </p>	
<p>6. Signature - Agent                  X </p>	
<p>7. Date of Delivery                  12/08/87</p>	
<p>8. Addressee's Address (ONLY if requested and fee paid)</p>	

DOMESTIC RETURN RECEIPT

File

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

December 3, 1987

Mr. Dick Myers  
Manager Environmental Control  
Olin Ordnance Corporation  
Post Office Box 222  
St. Marks, Florida 32355

Dear Mr. Myers:

In response to your letter dated November 2, 1987, we are attaching a copy of the two different Standard Industrial Classification Codes that may be applicable to your facility:

- 1) Major Group 34 - Fabricated Metals Products,  
Except Machinery and Transportation Equipment

Industry Group No. 348 - Ordnance and Accessories, Except Vehicles and Guided Missiles

Industry No. 3489 - Ordnance and Accessories, Not Elsewhere Classified

and

- 2) Major Group 28 - Chemicals and Allied Products

Industry Group No. 289 - Miscellaneous Chemicals Products

Industry No. 2892 - Explosives

In order to make the right classification of your facility, we request you quantify the potential emissions of all sources at your facility which have the same "Major Group" Standard Industrial Classification (SIC) Code, as described in those copies.

Please keep in mind that in a chemical complex, such as yours, different SICs codes will categorize your chemical complex in more than one facility. This facility category will affect the application of the Prevention of Significant Deterioration regulations.

Mr. Dick Myers  
Page Two  
December 3, 1987

Depending on the above analysis, your facility as a whole or each independent facility will be subject to the Prevention of Significant Deterioration (PSD) regulations, if the potential emission of all sources at the facility which have the same "Major Group" Standard Industrial Classification (SIC) Code is equal to or greater than 100 tons per year; and the facility belong to any of the facility categories listed in Table 500-1 Major Facility Categories, or if the net emission increase for a major facility is above the significant level Rule 17-2.500(2)(d)b, FAC and Rule 17-2.500(2)(e), FAC.

Otherwise, a facility will be considered major for purpose of PSD regulations, if the potential emission of all sources at the facility which have the same "Major Group" SIC code is equal or greater than 250 tons per year. Rule 17-2.500(2)(d)a., FAC or if the net emission increase for a major facility is above the significant level, Rule 17-2.500(2)(e), FAC.

Chapter 17-2, FAC, Table 500-1, lists as one of the 28 major facilities categories, all Chemical Process Plants (100 tons per year major facility). Basically, all sources under SIC Major Group 28 are considered a Chemical Process Plant.

Our current files show your facility, as a whole, is classified in Major Group 28, Chemicals and Allied products. Therefore, is a 100 tons per year major facility. This major group includes establishments producing basic chemicals, and establishments manufacturing products by predominantly chemical processes.

If you feel your facility has been incorrectly classified, please justify your position and let us know as soon as possible. Future reviews and applicable regulations will depend on the correct SIC classification.

Mr. Dick Myers  
Page Three  
December 3, 1987

If you have any questions, please call Bill Thomas, Chief Engineer or Teresa Heron, Review Engineer at (904)488-1344.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. H. Fancy', written in a cursive style.

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

CHF/TH/s

cc: J. Preece

Major Group 34: Fabricated Metals  
 MANUFACTURING Products, except  
 Machinery and Transportation Equipment

193



COATING, ENGRAVING, AND ALLIED SERVICES—Con.

3479 Coating, Engraving, and Allied Services, Not Elsewhere Classified—Con.

Painting (enameling and varnishing) of metal products, for the trade  
 Pan glazing, for the trade  
 Parkerizing, for the trade  
 Phosphate coating of metal and metal products, for the trade  
 Retinning of cans and utensils, not done in rolling mills

Rust proofing (hot dipping) of metals and formed products, for the trade  
 Sherardizing of metals and metal products, for the trade  
 Varnishing of metal products, for the trade

ORDNANCE AND ACCESSORIES, EXCEPT VEHICLES AND GUIDED MISSILES

3482 Small Arms Ammunition

Establishments primarily engaged in manufacturing ammunition for small arms having a bore of 30 mm. (or 1.18 inch) or less. Establishments primarily engaged in manufacturing ammunition, except for small arms, are classified in Industry 3483; those manufacturing blasting and detonating caps and safety fuses are classified in Industry 2892; and those manufacturing fireworks are classified in Industry 2899.

Ammunition and component parts, small arms: 30 mm. (or 1.18 inch) or less  
 Bullet jackets and cores, 30 mm. (or 1.18 inch) or less  
 Cartridge cases for ammunition, 30 mm. (or 1.18 inch) or less  
 Cartridges, 30 mm. (or 1.18 inch) or less  
 Cores, bullet: 30 mm. (or 1.18 inch) or less  
 Paper shells, 30 mm. (or 1.18 inch) or less

Pellets, ammunition: pistol and air rifle  
 Percussion caps, for ammunition of 30 mm. (or 1.18 inch) or less  
 Shells, small arms: 30 mm. (or 1.18 inch) or less  
 Shot, BB  
 Shot, lead  
 Shot, pellet  
 Shot, steel ammunition  
 Shotgun ammunition  
 Wads, ammunition: 30 mm. (or 1.18 inch) or less

3483 Ammunition, Except for Small Arms

Establishments primarily engaged in manufacturing ammunition, not elsewhere classified, or in loading and assembling ammunition more than 30 mm. (or more than 1.18 inch), including component parts. This industry also includes establishments primarily engaged in manufacturing bombs, mines, torpedoes, grenades, depth charges, chemical warfare projectiles, and their component parts. Establishments primarily engaged in manufacturing small arms ammunition are classified in Industry 3482; those manufacturing explosives are classified in Industry 2892; and those manufacturing military pyrotechnics are classified in Industry 2899.

Ammunition and component parts, more than 30 mm. (or more than 1.18 inch)  
 Ammunition loading and assembling plants  
 Arming and fusing devices for missiles  
 Bag loading plants, ammunition  
 Bomb loading and assembling plants  
 Bombcluster adapters  
 Bombs and parts  
 Boosters and bursters  
 Canisters, ammunition  
 Caps, bomb  
 Chemical warfare projectiles and components  
 Depth charges and parts (ordnance)  
 Detonators for ammunition more than 30 mm. (or more than 1.18 inch)

Detonators: mine, bomb, depth charge, and chemical warfare projectile  
 Fin assemblies, mortar: more than 30 mm. (or more than 1.18 inch)  
 Fin assemblies, torpedo and bomb  
 Fuses for ammunition more than 30 mm. (or more than 1.18 inch)  
 Fuses: mine, torpedo, bomb, depth charge, and chemical warfare projectile  
 Grenades and parts  
 Jet propulsion projectiles, complete  
 Loading and assembling bombs, powder bags, and shells: more than 30 mm. (or more than 1.18 inch)  
 Mines and parts (ordnance)  
 Missile warheads  
 Mortar shells, more than 30 mm. (or

boxes, stamped metal  
 sils, metal, except cast: household,  
 mmercial, and hospital  
 sils, porcelain enameled: house  
 d, commercial, and hospital  
 ing machine parts, porcelain  
 enameled  
 ebaskets, stamped metal

oring  
 troplating, plating, an  
 products for the trade.  
 h perform these types  
 ls or formed products.  
 icts are classified ac

plating of metals and formed  
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 ing metal products and formed  
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 ating, for the trade  
 y of metals and formed products,  
 ie trade  
 ng of metals and formed prod-  
 for the trade  
 ming auto bumpers, for the  
 sting of metal parts, for the  
 ng (cleaning and polishing) of  
 ie parts, for the trade

Classified  
 llowing types of serv-  
 and varnishing metal  
 d bars, castings, and  
 ting such items with  
 ) engraving, chasing  
 ls, and other metal  
 : metal services, not  
 stablishments which  
 purchased metals or  
 and finish products

g (including porcelain) of  
 icts, for the trade  
 g jewelry, silverware, and  
 or the trade: except printing  
 n metals for purposes other  
 ating  
 photochemical, for the trade  
 ng of iron and steel and end  
 icts, for the trade  
 g of metal  
 ameling, for the trade  
 g of metal products, for the  
 es: engraved and etched



194

STANDARD INDUSTRIAL CLASSIFICATION

Industry Group No. 348 Industry No.

ORDNANCE AND ACCESSORIES, EXCEPT VEHICLES AND GUIDED MISSILES—Con.

3483 Ammunition, Except for Small Arms—Con.

more than 1.18 inch)  
Primers for ammunition, more than 30 mm. (or more than 1.18 inch)  
Projectile forgings, machined: for ammunition more than 30 mm. (or more than 1.18 inch)

Rockets (ammunition)  
Shells, artillery: more than 30 mm. (or more than 1.18 inch)  
Torpedoes and parts (ordnance)  
Tracer igniters for ammunition more than 30 mm. (or more than 1.18 inch)

3484 Small Arms

Establishments primarily engaged in manufacturing small firearms having a bore 30 mm. (or 1.18 inch) or less, and parts for small firearms. Also included in this industry are establishments primarily engaged in manufacturing certain weapons more than 30 mm. which are carried and employed by the individual, such as grenade launchers and heavy field machine guns. Establishments primarily engaged in manufacturing artillery and mortars having a bore more than 30 mm. (or more than 1.18 inch), and component parts, are classified in Industry 3489.

Barrels, gun: 30 mm. (or 1.18 inch) or less  
Carbines, 30 mm. (or 1.18 inch) or less  
Carts, machine gun and machine gun ammunition  
Clips, gun: 30 mm. (or 1.18 inch) or less  
Cylinders and clips, gun: 30 mm. (or 1.18 inch) or less  
Firearms, 30 mm. (or 1.18 inch) or less  
Grenade launchers  
Gun sights, except optical: 20 mm. (or 1.18 inch) or less  
Guns, 30 mm. (or 1.18 inch) or less  
Guns, dart: except toy  
Guns: BB and pellet  
Links, for ammunition 30 mm. (or 1.18 inch) or less  
Machine gun belts, metallic: 30 mm. (or 1.18 inch) or less  
Machine guns and parts, 30 mm. (or 1.18 inch) or less

Magazines, gun: 30 mm. (or 1.18 inch) or less  
Mounts for guns, 30 mm. (or 1.18 inch) or less  
Pistols and parts, except toy  
Pyrotechnic pistols and projectors  
Recoil mechanisms for guns, 30 mm. (or 1.18 inch) or less  
Revolvers and parts  
Rifles and parts, 30 mm. (or 1.18 inch) or less  
Rifles, high compression pneumatic: 30 mm. (or 1.18 inch) or less  
Rifles: BB and pellet  
Rifles: pneumatic, spring loaded, and compressed air—except toy  
Shotguns and parts  
Submachine guns and parts

3489 Ordnance and Accessories, Not Elsewhere Classified

Establishments primarily engaged in manufacturing ordnance and accessories, not elsewhere classified, such as naval, aircraft, antiaircraft, tank, coast, and field artillery having a bore more than 30 mm. (or more than 1.18 inch), and components. Establishments primarily engaged in manufacturing small arms and parts 30 mm. (or 1.18 inch) or less are classified in Industry 3484; those manufacturing tanks are classified in Industry 3795; and those manufacturing guided missiles are classified in Industry Group 376.

Antisubmarine projectors (ordnance)  
Antitank rocket launchers  
Artillery parts for artillery more than 30 mm. (or more than 1.18 inch)  
Artillery, more than 30 mm. (or more than 1.18 inch): aircraft, antiaircraft, field, naval, and tank  
Barrels, gun: more than 30 mm. (or more than 1.18 inch)  
Bofors guns  
Cannons, more than 30 mm. (or more than 1.18 inch)  
Carriages, gun: for artillery more than 30 mm. (or more than 1.18 inch)

Catapult guns  
Depth charge release pistols and projectors  
Flame throwers (ordnance)  
Gun turrets and parts for artillery more than 30 mm. (or more than 1.18 inch)  
Guns, more than 30 mm. (or more than 1.18 inch)  
Howitzers, more than 30 mm. (or more than 1.18 inch)  
Limbers, gun and caisson  
Links for ammunition more than 30 mm. (or more than 1.18 inch)

120MM

Industry Group No. 348 Industry No.

ORDNANCE AND ACCESSORIES, EXCEPT VEHICLES AND GUIDED MISSILES—Con.

3489 Ordnance and Accessories, Not Elsewhere Classified

Livens...  
Machine...  
more t...  
Mortars...  
than 1...  
Oerlikon...  
Projector...  
lease,

349

MISCELLANEOUS

3491 Industrial Machinery and Equipment

Establishments primarily engaged in manufacturing machinery and equipment classified in Industry 3491 are classified in Industry 3491. Heating valves and parts are classified in Industry 3492.

Boiler g...  
Compre...  
Fire hy...  
Gas val...  
Pop saf...  
Pressur...  
power...  
Steam t...

3492 Fluid Power Systems

Establishments primarily engaged in manufacturing fluid power systems are classified in Industry 3492. Exhaust manifolds and parts are classified in Industry 3493.

Control...  
Electro...  
powe...  
Hose...  
powe...  
Hydra...  
fluid...  
Pneum...  
fluid...

3493 Steel Springs and Parts

Establishments primarily engaged in manufacturing steel springs and parts are classified in Industry 3493.

Auton...  
Coiled...  
Flat s...  
Helic...  
equi...  
Hot w...

Industry  
Group  
No.

Industry  
No.

**ORDNANCE AND ACCESSORIES, EXCEPT VEHICLES AND GUIDED MISSILES—Con.**

**3489 Ordnance and Accessories, Not Elsewhere Classified—Con.**

Livens projectors (ordnance)  
Machine guns, more than 30 mm. (or more than 1.18 inch)  
Mortars, more than 30 mm. (or more than 1.18 inch)  
Oerlikon guns  
Projectors: antisub, depth charge release, grenade, livens, and rocket

Recoil mechanisms for guns more than 30 mm. (or more than 1.18 inch)  
Rifles, recoilless  
Rocket launchers, hand-held  
Smoke generators (ordnance)  
Tampions for guns more than 30 mm. (or more than 1.18 inch)  
Torpedo tubes (ordnance)

349

**MISCELLANEOUS FABRICATED METAL PRODUCTS**

**3491 Industrial Valves**

Establishments primarily engaged in manufacturing industrial valves. Establishments primarily engaged in manufacturing fluid power valves are classified in Industry 3492; those manufacturing plumbing fixture fittings and trim are classified in Industry 3432; and those manufacturing plumbing and heating valves are classified in Industry 3494.

Boiler gauge cocks  
Compressed gas cylinder valve  
Fire hydrant valves  
Gas valves and parts, industrial  
Pop safety valves, over 15 lbs. w.s.p.  
Pressure valves, industrial: except power transfer  
Steam traps, over 15 lbs. w.s.p.

Valves, automatic control: industrial, except fluid power  
Valves, industrial: gate, globe, check, pop safety, and relief  
Valves, nuclear  
Valves, relief: over 15 lbs. w.s.p.  
Valves, solenoid: except fluid power  
Water works valves

**3492 Fluid Power Valves and Hose Fittings**

Establishments primarily engaged in manufacturing hydraulic and pneumatic valves, hose and tube fittings, and hose assemblies for fluid power systems. Establishments primarily engaged in manufacturing fluid power cylinders are classified in Industry 3593; those manufacturing fluid power pumps are classified in Industry 3594; and those manufacturing hydraulic intake and exhaust motor vehicle valves are classified in Industry 3592.

Control valves, fluid power: metal  
Electrohydraulic servo valves, fluid power: metal  
Hose fittings and assemblies, fluid power: metal  
Hydraulic valves, including aircraft: fluid power—metal  
Pneumatic valves, including aircraft: fluid power—metal

Pressure control valves, fluid power: metal  
Solenoid valves, fluid power: metal  
Tube fittings and assemblies, fluid power: metal  
Valves, automatic control: fluid power—metal  
Valves, hydraulic and pneumatic control: fluid power—metal

**3493 Steel Springs, Except Wire**

Establishments primarily engaged in manufacturing leaf springs, hot wound springs, and coiled flat springs. Establishments primarily engaged in manufacturing wire springs are classified in Industry 3495.

Automobile springs  
Coiled flat springs  
Flat springs, sheet or strip stock  
Helical springs, hot wound: for railroad equipment and vehicles  
Hot wound springs, except wire springs

Leaf springs: automobile, locomotive, and other vehicle  
Railroad equipment springs  
Steel springs, except wire  
Torsion bar springs

**LES AND GUIDED**

lets (ammunition)  
s, artillery: more than 30 mm. (or more than 1.18 inch)  
oddes and parts (ordnance)  
er igniters (for ammunition more than 20 mm. (or more than 1.18 inch)

small firearms having  
ll firearms. Also includ-  
aged in manufacturing  
d and employed by the  
d machine guns. Estab-  
y and mortars having a  
d component parts, are

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376.

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for ammunition more than 30  
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**Major Group 28.—CHEMICALS AND ALLIED PRODUCTS**

*The Major Group as a Whole*

This major group includes establishments producing basic chemicals, and establishments ~~manufacturing products by~~ predominantly chemical processes. Establishments classified in this major group manufacture three general classes of products: (1) basic chemicals, such as acids, alkalis, salts, and organic chemicals; (2) chemical products to be used in further manufacture, such as synthetic fibers, plastics materials, dry colors, and pigments; and (3) finished chemical products to be used for ultimate consumption, such as drugs, cosmetics, and soaps; or to be used as materials or supplies in other industries, such as paints, fertilizers, and explosives. The mining of natural alkalis and other natural potassium, sodium, and boron compounds, of natural rock salt, and of other natural chemicals and fertilizers are classified in Mining, Industry Group 147. Establishments primarily engaged in manufacturing nonferrous metals and high-percentage ferroalloys are classified in Major Group 33; those manufacturing silicon carbide are classified in Major Group 32; those manufacturing baking powder, other leavening compounds, and starches are classified in Major Group 20; and those manufacturing artists' colors are classified in Major Group 39. Establishments primarily engaged in packaging, repackaging, and bottling of purchased chemical products, but not engaged in manufacturing chemicals and allied products, are classified in Wholesale or Retail Trade industries.

Industry Group No.	Industry No.
--------------------------	-----------------

**281 INDUSTRIAL INORGANIC CHEMICALS**

This industry group includes establishments primarily engaged in manufacturing basic industrial inorganic chemicals. Establishments primarily engaged in manufacturing formulated agricultural pesticides are classified in Industry 2879; those manufacturing medicinal chemicals, drugs, and medicines are classified in Industry Group 283; and those manufacturing soap and cosmetics are classified in Industry Group 284.

**2812 Alkalis and Chlorine**

Establishments primarily engaged in manufacturing alkalis and chlorine. Establishments primarily engaged in mining natural alkalis are classified in Mining, Industry 1474.

Alkalis, not produced at mines  
Caustic potash  
Caustic soda  
Chlorine, compressed or liquefied  
Potassium carbonate  
Potassium hydroxide  
Sal soda (washing soda)

Soda ash, not produced at mines  
Sodium bicarbonate, not produced at mines  
Sodium carbonate (soda ash), not produced at mines  
Sodium hydroxide (caustic soda)  
Washing soda (sal soda)

**2813 Industrial Gases**

Establishments primarily engaged in manufacturing industrial gases (including organic) for sale in compressed, liquid, and solid forms. Establishments primarily engaged in manufacturing fluorine and sulfur dioxide are classified in Industry 2819; those manufacturing household ammonia are classified in Industry 2842; those manufacturing other ammonia are classified in Industry 2873; those manufacturing chlorine are classified in Industry 2812; and those

Industry Group No.	Industry No.
--------------------------	-----------------

281

2813

2816

281

148

STANDARD INDUSTRIAL CLASSIFICATION

Industry Group No. Industry No.

287 AGRICULTURAL CHEMICALS—Con.

2879 Pesticides and Agricultural Chemicals, Not Elsewhere Classified—Con.

- |  |   |
|--|---|
| Cattle dips  | Nicotine bearing insecticides                 |
| Copper arsenate, formulated                              | Paris green (insecticide)                     |
| DDT (insecticide), formulated                            | Pesticides, household                         |
| Defolianta   | Phytoactin                                    |
| Elements, minor or trace (agricultural chemicals)        | Plant hormones                                |
| Exterminating products, for household and industrial use | Poison: ant, rat, roach, and rodent—household |
| Fly sprays   | Pyrethrin bearing preparations                |
| Fungicides   | Pyrethrin concentrates                        |
| Growth regulants, agricultural                           | Rodenticides                                  |
| Herbicides   | Rotenone bearing preparations                 |
| Household insecticides                                   | Rotenone concentrates                         |
| Insect powder, household                                 | Sheep dips, chemical                          |
| Insecticides, agricultural                               | Sodium arsenite (formulated)                  |
| Lead arsenate, formulated                                | Soil conditioners                             |
| Lime-sulfur, dry and solution                            | Sulfur dust (insecticide)                     |
| Lindane, formulated                                      | Thiocyanates, organic (formulated)            |
| Moth repellants  | Trace elements (agricultural chemicals)       |
| Nicotine and salts                                       | Xanthone (formulated)                         |

289

MISCELLANEOUS CHEMICAL PRODUCTS

2891 Adhesives and Sealants

Establishments primarily engaged in manufacturing industrial and household adhesives, glues, caulking compounds, sealants, and linoleum, tile, and rubber cements from vegetable, animal, or synthetic plastics materials, purchased or produced in the same establishment. Establishments primarily engaged in manufacturing gelatin and sizes are classified in Industry 2899, and those manufacturing vegetable gelatin or agar-agar are classified in Industry 2833.

- |   |  |
|---|--|
| Adhesives   | Laminating compounds                             |
| Adhesives, plastics   | Mucilage   |
| Caulking compounds  | Paste, adhesive                                  |
| Cement (cellulose nitrate base)   | Porcelain cement, household                      |
| Cement, linoleum  | Rubber cement                                    |
| Cement, mending   | Sealing compounds for pipe threads and joints    |
| Epoxy adhesives   | Sealing compounds, synthetic rubber and plastics |
| Glue, except dental: animal, vegetable, fish, casein, and synthetic resin | Wax, sealing                                     |
| Iron cement, household  |  |
| Joint compounds   |  |

2892 Explosives

Establishments primarily engaged in manufacturing explosives. Establishments primarily engaged in manufacturing ammunition for small arms are classified in Industry 3482, and those manufacturing fireworks are classified in Industry 2899.

- |  |                                       |
|--|---------------------------------------|
| Amatol (explosives)                                  | Fuse powder                           |
| Azides (explosives)                                  | Fuses, safety                         |
| Blasting powder and blasting caps                    | Gunpowder                             |
| Carbohydrates, nitrated (explosives)                 | High explosives                       |
| Cordau detonant (explosives)                         | Lead azide (explosives)               |
| Cordite (explosives)                                 | Mercury azide (explosives)            |
| Detonating caps for safety fuses                     | Nitrocellulose powder (explosives)    |
| Detonators (explosive compounds)                     | Nitroglycerin (explosives)            |
| Dynamite   | Nitromannitol (explosives)            |
| Explosive cartridges for concussion forming of metal | Nitrostarch (explosives)              |
| Explosive compounds                                  | Nitrosugars (explosives)              |
| Explosives   | Pentolite (explosives)                |
| Fulminate of mercury (explosive compounds)           | Permissible explosives                |
|  | Picric acid (explosives)              |
|  | Powder, explosive: pellets, smokeless |

Industry Group No. Industry No.

289

2892

2893

2895

2899

Industry  
Group  
No.  
289

Industry  
No.

**MISCELLANEOUS CHEMICAL PRODUCTS—Con.**

**2892 Explosives—Con.**

and sporting  
RDX (explosives)  
Squibbs, electric  
Styphnic acid

TNT (trinitrotoluene)  
Tetryl (explosives)  
Well shooting torpedoes (explosives)

**2893 Printing Ink**

Establishments primarily engaged in manufacturing printing ink, including gravure ink, screen process ink, and lithographic ink. Establishments primarily engaged in manufacturing writing ink and fluids are classified in Industry 2899, and those manufacturing drawing ink are classified in Industry 3952.

Bronze ink  
Flexographic ink  
Gold ink  
Gravure ink  
Ink, duplicating

Letterpress ink  
Lithographic ink  
Offset ink  
Printing ink: base or finished  
Screen process ink

**2895 Carbon Black**

Establishments primarily engaged in manufacturing carbon black (channel and furnace black). Establishments primarily engaged in manufacturing bone and lamp black are classified in Industry 2816.

Carbon black  
Channel black

Furnace black

**2899 Chemicals and Chemical Preparations, Not Elsewhere Classified**

Establishments primarily engaged in manufacturing miscellaneous chemical preparations, not elsewhere classified, such as fatty acids, essential oils, gelatin (except vegetable), sizes, bluing, laundry sours, writing and stamp pad ink, industrial compounds, such as boiler and heat insulating compounds, metal, oil, and water treating compounds, waterproofing compounds, and chemical supplies for foundries. Establishments primarily engaged in manufacturing vegetable gelatin (agar-agar) are classified in Industry 2833; those manufacturing dessert preparations based on gelatin are classified in Industry 2099; those manufacturing printing ink are classified in Industry 2893; and those manufacturing drawing ink are classified in Industry 3952.

Acid resist for etching  
Acid, battery  
Anise oil  
Antifreeze compounds, except industrial alcohol  
Bay oil  
Binders (chemical foundry supplies)  
Bluing  
Boiler compounds, antiscaling  
Bombs, flashlight  
Caps, for toy pistols  
Carbon removing solvent  
Chemical cotton (processed cotton lint-ers)  
Chemical supplies for foundries  
Citronella oil  
Concrete curing compounds (blends of pigments, waxes, and resins)  
Concrete hardening compounds  
Core oil and binders  
Core wash  
Core wax  
Correction fluid  
Corrosion preventive lubricant, synthetic base: for jet engines

Deicing fluid  
Desalter kits, sea water  
Dextrine sizes  
Drilling mud  
Dyes, household  
Essential oils  
Ethylene glycol antifreeze preparations  
Eucalyptus oil  
Exothermics for metal industries  
Facings (chemical foundry supplies)  
Fatty acids: margaric, oleic, and stearic  
Fire extinguisher charges  
Fire retardant chemical preparations  
Fireworks  
Flares  
Fluidifier (retarder) for concrete  
Fluorescent inspection oil  
Fluxes: brazing, soldering, galvanizing, and welding  
Foam charge mixtures  
Food contamination testing and screening kits  
Foundry supplies, chemical preparations  
Prit

150

## STANDARD INDUSTRIAL CLASSIFICATION

Industry  
Group  
No.      Industry  
No.

## MISCELLANEOUS CHEMICAL PRODUCTS—Con.

## 2899 Chemicals and Chemical Preparations, Not Elsewhere Classified—Con.

Fuel tank and engine cleaning chemicals, automotive and aircraft	Oxidizers, inorganic
Fuses: highway, marine, and railroad	Packers' salt
Gelatin capsules, empty	Parting compounds (chemical foundry supplies)
Gelatin: edible, technical, photographic, and pharmaceutical	Patching plaster, household
Glue size	Penetrants, inspection
Grapefruit oil	Peppermint oil
Grouting material (concrete mending compound)	Plating compounds
Gum sizes	Pyrotechnic ammunition: flares, signals, flashlight bombs, and rockets
Gun slushing compounds	Railroad torpedoes
Heat insulating compounds	Red oil (oleic acid)
Heat treating salts	Rifle bore cleaning compounds
Hydrofluoric acid compound, for etching and polishing glass	Rosin sizes
Igniter grains, boron potassium nitrate	Rubber processing preparations
Incense	Rust resisting compounds
Industrial sizes	Salt
Insulating compounds	Signal flares, marine
Jet fuel igniters	Sizes: animal, vegetable, and synthetic plastics materials
Laundry soaps	Sodium chloride, refined
Lemon oil	Soil testing kits
Lighter fluid	Spearmint oil
Magnetic inspection oil and powder	Spirit duplicating fluid
Margaric acid	Stearic acid
Metal drawing compound lubricants	Stencil correction compounds
Metal treating compounds	Tints and dyes, household
Military pyrotechnics	Torches (fireworks)
Napalm	Vegetable oils, vulcanized or sulfurized
Oil treating compounds	Water treating compounds
Oleic acid (red oil)	Water, distilled
Orange oil	Waterproofing compounds
Orris oil	Wintergreen oil
Ossein	Wood, plastic
	Writing ink and fluids

Major Gro

This major gro  
ufacturing paving  
purchased materia  
classified in public  
byproducts are clas

Industry  
Group  
No.      Industry  
No.

291

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PS Form 3811, July 1985 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

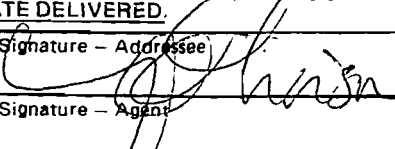
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult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

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to: Mr. D. E. Findley, Dir.  
 St. Marks Operation  
 Olin Corporation  
 P.O. Box 222  
 St. Marks, FL 32355

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 274 007 643

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
 X 

6. Signature - Agent  
 X

7. Date of Delivery  
 12/4/87

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

DOMESTIC RETURN RECEIPT

P 274 007 643

**RECEIPT FOR CERTIFIED MAIL**

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

PS Form 3800, June 1985

U.S.G.P.O. 1985-480-794

Mr. D.E. Findley, Director Olin Corporation Street and No. Post Office Box 222	
P.O. State and ZIP Code St. Marks, FL 32355	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 12/3/87	
Permit: AC 65-140731	

*file*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

December 2, 1987

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. D. E. Findley, Director  
St. Marks Operation  
Olin Corporation  
Post Office Box 222  
St. Marks, Florida 32355

Dear Mr. Findley:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct/insall a BECO Multi-Micro Venturi Scrubber in series with a second stage packed column to be located in at the Olin Corporation Complex, in St. Marks, Wakulla County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management, or call him at (904) 488-1344.

Sincerely,

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

CHF/bm

Attachments

cc: Ed Middleswart, Northwest Dist.  
A. F. McElfresh, P.E.



State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department gives notice of its intent to issue a permit to Olin Corporation for the construction/installation of BECO Multi-Micro Venturi Scrubber in series with a second stage packed column to be located at the Olin Corporation Complex in St. Marks, Wakulla County, Florida.

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

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

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

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

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

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

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

28-5.15 Requests for Formal and Informal Proceedings

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

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Olin Corporation  
Post Office Box 222  
St. Marks, Florida 32355

---

DER File Nos. AC 65-140731

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copies 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, Olin Corporation applied on October 16, 1987, to the Department of Environmental Regulation for a permit to construct/install a BECO Multi-Micro Venturi Scrubber in a series with a second stage packed column to be located at the Olin Corporation Complex, in St. Marks, Wakulla County, Florida.

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

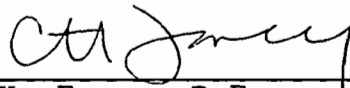
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be

provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit applications. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Ed Middleswart, NW Dist.  
A. F. McElfresh, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 12-3-87.

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

Martha J. Lewis 12-3-87  
Clerk Date

Technical Evaluation  
and  
Preliminary Determination

Olin Corporation  
Wakulla County

North Sweetie Barrel Scrubber with Exhaust Blower  
Permit No. AC 65-140731

APIS No. 10TLH65000301

Bureau of Air Quality Management  
Central Air Permitting  
New Source Review Section

December 3, 1987

I. NAME AND ADDRESS OF APPLICANT

Olin Corporation  
P. O. Box 222  
St. Marks, Florida 32355

II. REVIEWING AND PROCESS SCHEDULE

Date of Receipt of Application: October 16, 1987

Completeness Review:

Pre-submission meeting was held on October 6, 1987 between Olin Corporation's and Department's representatives

Application's Completeness Date: October 16, 1987

III. FACILITY INFORMATION

Facility Location

The proposed facility will be located at U.S. 98 and S.R. 363 (Olin Corporation) in St. Marks, Wakulla County, Florida. The latitude and longitude of this site are 30°, 11', 07" North and 84°, 13', 30" West, respectively.

Standard Industrial Classification

The Olin Corporation facility is classified as follows:

Major Group 28: Chemicals and Allied Products  
Group 289: Miscellaneous Chemical Products  
Industry No. 2892: Explosives

Facility Category

Olin Corporation is classified as a major emitting facility for sulfur dioxide (SO<sub>2</sub>). Permitted SO<sub>2</sub> emissions are 245 tons per year. The proposed project to replace the existing glazing drum (Sweetie Barrel) exhaust air scrubber, will increase the overall VOC emissions at Olin Corporation's complex by 15.63 tons per year.

IV. PROCESS DESCRIPTION

Powder is pneumatically conveyed from a Packout Area to the Sweetie Barrel drum. Graphite is added to the powder in the drum. Air is exhausted from the drum by a fan which draws the exhaust through the scrubber. The powder is heated in the drum with hot water at 65°C in the drum jacket. Surface coating slurry or solution (using isopropyl alcohol, IPA, as the carrier)



is slowly injected into the powder. The injection line is cleaned by flushing with IPA into the drum. The powder and coating slurry or solution are then tumbled in the drum smearing the coating on the surface of the powder as the IPA is evaporated and exhausted through the scrubber system. After finishing the required tumble time, more graphite is added. The powder is then cooled with process water in the jacket. After cooling the powder is returned to the Packout Area by being dumped and then pneumatically conveyed. The exhaust fan is then shut down.

The new scrubber will use single-pass process water for scrubbing in order to get the required efficiency. The IPA-laden water will be discharged from the bottom of the scrubber to the area sump, from which it is then pumped to the Wastewater Treatment Plant. Scrubber water flow and exhaust air flow will be monitored to insure that scrubber efficiency is maintained.

One increment of powder will be coated at a time. The increment may be 1080, 1260, or 1440, pounds. The 1080-pound increment utilizes the most IPA and is used as the basis for determining both instantaneous and yearly IPA emissions. The increment cycle time for a 1080-pound increment may be as short as three (3) hours and the IPA removal period as short as 68 minutes.

#### V. RULE APPLICABILITY

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

The proposed facility, is located at the Olin Corporation complex in an area (Wakulla County) currently designated attainment for all criteria pollutants in accordance with Florida Administrative Code Rule 17-2.420. This facility site is close to the St. Marks National Wildlife Refuge (Class I area).

The proposed project is exempt from provisions of Rule 12-2.500, Prevention of Significant Deterioration because the increase of emissions do not exceed the significant emission rate (Table 500-2).

The proposed project shall be permitted under Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The proposed facility shall comply with Rule 17-2.620(1) and (2) General Pollutant Emission Limiting Standard.

For a future modification, this facility (Olin Corporation) may be subject to a PSD review if the net emissions

increase of any criteria pollutant is equal to or greater than the significant emissions rate listed in Table 500-2.

## VI. SOURCE IMPACT ANALYSIS

VI. 1 The operation of this facility will produce emissions of isopropyl alcohol (IPA) and particulate matter to the atmosphere.

The amount of solvent used during the process and its emission is limited by permit conditions. This permitted emission is in compliance with all applicable requirements of Chapter 17-2, Florida Administrative Code.

Table 1 summarizes potential to emit of all pollutants used in this process.

### VI. 2 Air Quality Analysis

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

### VI. 3 Air Toxics Information

Currently, the Department is developing acceptable air emissions levels for toxic substances. Specifically, sources classified as Category A (high and moderate toxicity air contaminant) Category B (low toxicity air contaminant).

Isopropyl alcohol, is considered a Category A compound (moderately toxic air contaminant). The Threshold Limit Value (TLV's) are 400 ppm and 980 mg/m<sup>3</sup>. The minimum safety factor than can be used for this compound is 1/100 of its TWA-TLV for a 8 hours per day operation or 1/420 of its TWA for a 168 hours per week operation.

## VII. CONCLUSION

Based on a review of the data submitted by Olin, the Florida Department of Environmental Regulation (FDER) concludes that compliance with all applicable state air quality regulations will be achieved, provided certain specific conditions are met. The impact of installing a new glazing drum air scrubber at the Olin Corporation plant will not cause or contribute to a violation of any ambient air quality standards.

Table 1

Allowable Emissions

<u>Contaminant</u>	<u>VOC Emissions</u>	
	<u>lb/hr</u>	<u>ton/yr</u>
Isopropanol (IPA) Vapors	13.5	21.40
Powder Dust & Graphite	<u>PM Emissions</u>	
	<u>lb/hr</u>	<u>ton/yr</u>
	0.01	0.04

This proposed scrubber will replace existing scrubber which is currently permitted by AO 65-79867.

The net increase of emissions from this source is 15.63 tons per year (VOC).

	<u>TPY</u>
Existing Unit (AO 65-79867)	5.7
New Unit (AC 65-140731)	21.40
Net Increase	15.63

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
Olin Corporation  
P. O. Box 222  
St. Marks, Florida 32355

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989  
County: Wakulla  
Latitude/Longitude: 30° 10' 48" N/  
84° 13' 24" W  
Project: Installation of a North  
Sweetie Barrel with Exhaust Blower

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

For the construction/installation of BECO Multi-Micro Venturi Scrubber in series with a second stage packed column to be located at the Olin Corporation Complex, in St. Marks, Wakulla County, Florida.

Attachments:

1. Application to construct Air Pollution Sources, DER Form 17-1.122(16) dated October 13, 1987.

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

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

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

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

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

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

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

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

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

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

**GENERAL CONDITIONS:**

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

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

**SPECIFIC CONDITIONS:**

1. Total volatile organic emissions (VOC) from this source shall not exceed 13.5 lbs/hr and 21.4 tons/year.

2. Compliance with VOC emission standard will be determined by Method 25 or other methods approved by the Department. Concentration data and calculated mass emission rate will be reported. Thereafter, compliance with the VOC emission limitations will be maintained based on the VOC inventory. The District office shall be notified 15 days prior to test.



PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

SPECIFIC CONDITIONS:

3. No objectionable odors are allowed from this facility.
4. This permit replaces current operation permit No. AO 65-79867.
5. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration date of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-4.09 Florida Administrative Code)
6. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4.22 and 17-4.23, Florida Administrative Code.)
7. Upon obtaining an operating permit, the permittee will be required to submit annual reports on the actual operation and emissions of the facility. Annual material balance reports (24-hour) shall be required and sent to the Department's district office to assess emissions and maintain VOC inventory. Visible emissions test shall be performed on an annual basis.
8. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4.10 Florida Administrative Code)

PERMITTEE:  
Olin Corporation

Permit Number: AC 65-140731  
Expiration Date: July 31, 1989

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

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

PM  
4 Nov. 1987  
St. Marks, FL

file copy



**ST. MARKS OPERATIONS**

November 2, 1987

Claire Fancy, P.E.  
Bureau of Air Quality Management  
State of FL, Dept. of Env. Regulation  
Twin Towers Office Building  
2600 Blainstone Road  
Tallahassee, Florida 32301-8241

Re: Future PSD Reviews

Dear Mr. Fancy:

After our pre-application submission meeting with Mr. Bill Thomas and Ms. Theresa Heron, we were more than a little confused about whether 100 tons of total pollutants or 250 tons of total pollutants triggered the PSD review. On a previous potential submission, you agreed that "preconstruction ambient air monitoring, as well as other PSD new source review requirements will not be required if emissions of all pollutants from your existing facility at St. Marks are limited to less than 250 tons per year and the proposed modification will not result in an increase in emissions from the facility of 250 tons per year of any pollutant." (I am enclosing a copy of your letter.)

It is relatively simple for Olin to control emissions to a total of less than 250 tons by the use of more 1% sulfur bearing oil in our steam generators. In fact, in 1986, our emissions for the three permitted sources were as follows:

- A065-113388 - 212.6 Tons SO<sub>2</sub>
- A065-79867 - 5.77 Tons VOC
- A065-114702 - NIL

In our current application for a new scrubbing system at the Glazing Drum we project a maximum of 21.4 tons/yr of VOC, and this replaces the actual usage of 5.77 tons/yr VOC in 1986. We have also added the CCC production permit, A065-136176 at 12.23 tons/yr VOC and a Salt Coater A065-136175 at 12.9 tons/yr VOC. Assuming we use the maximum allowed for all VOC permits, emissions would be as follows:

- Glazing Drum - 21.40
- CCC - 12.23
- Salt Coater - 12.90
- TOTAL ALLOWED 46.53 tons VOC/yr

**DER**

**NOV 5 1987**

**BAQM**

Mr. Claire Fancy  
November 2, 1987  
Page Two

We could then limit SO<sub>2</sub> emissions from the boilers to 200 tons/yr and stay well under the 250 tons/yr.

I would appreciate a review of this situation and an opinion of just what will trigger a PSD for our St. Marks facility based on your interpretation of the regulations. I also need a determination of the actual steps involved in a PSD review with an approximate time table for each step. As you can understand, this information is critical to Olin's financial and project planning.

We would certainly appreciate a response to these questions as soon as is reasonably possible.

Thanks,

*Dick*  
D. Myers  
Manager, Environmental Control

DH/jah

Enclosures

cc: Mr. Bill Thomas

Copied: CHF/BT

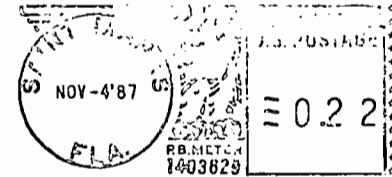
Teresa Heron

Ed. Middleswert - NW Dist

} 11/6/87 *mr*



St. Marks, Florida 32355



Mr. Claire Fancy, P.E.  
Bureau of Air Quality Management  
State of FL, Dept. of Env. Regulation  
Twin Towers Office Building  
2600 Blairstone Road  
Tallahassee, FL 32301-8241



cc: Dick Myers

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

March 25, 1982

Mr. D. E. Findley, Director  
Powder Operations  
Olin Corporation  
St. Marks, Florida 32355

Dear Mr. Findley:

We concur with your understanding of the prevention of significant deterioration (PSD) requirements of Florida Administrative Code Rule 17-2.500 as you outlined them in your letter to me of March 19, 1982. Specifically, we agree that preconstruction ambient air monitoring, as well as other PSD new source review requirements, will not be required if emissions of all pollutants from your existing facility at St. Marks are limited to less than 250 tons per year and the proposed modification will not result in an increase in emissions from the facility of 250 tons per year of any pollutant.

We also agree that the air quality issues involved in locating a source in close proximity to a Class I Area can be complex, and we look forward to working with you and your staff to insure that your permit application is complete and acceptable.

Sincerely,

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

CHF/LG/bjm

cc: T. Moody, Northwest District

RECEIVED

MAR 30 1982

D.E. FINDLEY

11 U method 18 - Measurement of Baseair.  
Organic Compound Emissions  
by Bar Pneumatography - 48 FR 48344

will be adopted April 26, 89.



Receipt # 76186  
AC 65-140731  
\$100.00

2069

ST. MARKS OPERATIONS

October 13, 1987

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

Re: Enclosed Construction Permit Application for  
Glazing Drum/Air Scrubber

Dear Mr. Fancy:

Our Glazing Drum (Sweetie Barrel) exhaust air scrubber is currently permitted by A065-79867, which allows Olin to add a Vinsol surface deterrent coating to some propellants. This system is very efficient for particulate removal, but not for Isopropyl Alcohol (IPA) vapors. Our production schedules are now going to require additional surface coatings along with the current need for Vinsol coatings, and these coatings will be added to the propellant in the Glazing Drum in either an IPA solution or slurry. In either case, the temperature inside the Glazing Drum will be raised by addition of hot water to the drum jacket. The IPA will then be vaporized and passed through the air scrubber. Because of the inefficiencies of the present system, Olin proposes to replace the existing scrubber with a more efficient one.

Enclosed, please find six (6) copies of our Construction Permit Application along with the required application fee of \$100. Since draft copies of this application were reviewed by Jack Preece, Theresa Heron and Bill Thomas of FDER and a pre-submission meeting was held with Ms. Heron and Mr. Thomas and Mr. Carroll and Mr. Myers of Olin Corporation, we are confident you will find this application complete.

If there are any questions, however, please contact the writer by letter or Messrs. Carroll or Myers by phone at (904)925-6111.

Sincerely,

D. E. Findley, Director  
St. Marks Operations

DEF/RLM/jah  
REM

Enclosures

Copies: Ed Muddewant - NW Dist.

001031

A DIVISION OF OLIN DEFENSE SYSTEMS GROUP  
P.O. BOX 222, ST. MARKS, FLORIDA 32355 • (904) 925-6111 • TELEX 4750119 OLIN UI

OLIN CORPORATION

RECEIVED  
DER-MAIL ROOM  
1987 OCT 16 AM 10:39



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Glazing Drum/Air Scrubber [ ] New<sup>1</sup> [X] Existing<sup>1</sup>  
APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification  
COMPANY NAME: Olin Corporation COUNTY: Wakulla  
Identify the specific emission point source(s) addressed in this application (i.e. Line  
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) North Sweetie Barrel/Scrubber  
with Exhaust Blower  
SOURCE LOCATION: Street Interstate U.S. 98 & S.R. 363 City St. Marks  
UTM: East 767389 North 3341808  
Latitude 30° 10' 48" N Longitude 84° 13' 24" W  
APPLICANT NAME AND TITLE: D. E. Findley, Director, St. Marks Operations  
APPLICANT ADDRESS: Post Office Box 222, St. Marks, Florida 32355

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Olin Corporation

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

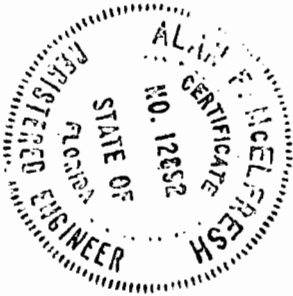
Signed: D. E. Findley  
D. E. Findley, Director, St. Marks Operations  
Name and Title (Please Type)  
Date: 10/13/87 Telephone No. (904)925-6111

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

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

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

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



Signed *A. F. McElfresh*  
A. F. McElfresh  
 Name (Please Type)

Olin Corporation  
 Company Name (Please Type)

Post Office Box 222, St. Marks, FL 32355  
 Mailing Address (Please Type)

Florida Registration No. 12892 Date: 9/17/87 Telephone No. (904)925-6111

**SECTION II: GENERAL PROJECT INFORMATION**

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

See Attachment II - Process Description (North Sweetie Barrel)

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

Start of Construction Feb., 1988 Completion of Construction November, 1988

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.)

Scrubber	\$21,200	Installation-Mechanical	\$9,448
Blower	3,949	Installation-Electrical	3,294
Instruments & Equipment	3,784	Engineering	4,218
		TOTAL	\$45,893

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

Construction Permit AC65-64760

Operation Permit A065-79867

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 50 ;  
if power plant, hrs/yr NA ; if seasonal, describe: NA

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

1. Is this source in a non-attainment area for a particular pollutant? No
  - a. If yes, has "offset" been applied? -
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? -
  - c. If yes, list non-attainment pollutants. -
2. Does best available control technology (BACT) apply to this source?  
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? -
  - b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

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

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

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

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

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

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

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

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>4</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Isopropanol Vapors	13.5	21.4	-	-	67.4	107.0	D-16-9-5 Sht 1, Rev. 10
Powder Dust & Graphite	0.009	0.038	-	-	0.299	1.25	D-16-9-5 Sht 1, Rev. 10

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

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

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

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

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency (minimum)	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
BECO Multi-MicroVenturi (MMV) Venturi Scrubber	Isopropyl Alcohol Vapors	80%	-	*
in series with a	Powder Dust & Graphite	92%	≥ 4 micron	*
second stage packed	"	66%	≥ 2 micron	*
column, Model	"	41%	≥ 1 micron	*
* Vendor Guarantee				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: NA Percent Ash: NA  
 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 NA Maximum NA

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

80% of the isopropanol will be absorbed by the scrubber water and routed to the  
waste treatment plant. There will also be very small quantities of powder and  
graphite in the scrubber water discharge. Anticipated flow from the scrubber is  
approximately 29 gpm.

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

Stack Height: Discharge to Floor Sump ft. Stack Diameter: 1'-7/16" x 0'-11-1/8" ft.  
 Gas Flow Rate: 3340 ACFM 3340 DSCFM Gas Exit Temperature: Ambient °F.  
 Water Vapor Content: Saturated % Velocity: 57.9 FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

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

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

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

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

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

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

Brief description of operating characteristics of control devices: \_\_\_\_\_

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

NOTE: Items 2, 3, 4, 6, 7, 9, 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.

**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
N/A	

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

Yes  No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

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

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

\*Explain method of determining



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

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

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

2.

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

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

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

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:<sup>1</sup>

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:<sup>2</sup>

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

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

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

(5) Environmental Manager:

(6) Telephone No.:

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

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

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

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

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

10. Reason for selection and description of systems:

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

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data N/A

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

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

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

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).



## APPENDICES

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I. St. Marks Operations ..... (Plant Operational Description)	1
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**OLIN ORDNANCE  
ST. MARKS OPERATIONS  
A DIVISION OF OLIN DEFENSE SYSTEMS GROUP**

The Olin Corporation facility at St. Marks produces BALL POWDER® propellant for small and intermediate caliber ammunition. The basic raw material for the manufacture of this propellant is nitrocellulose. Part of the nitrocellulose is purchased from an outside vendor and the rest is obtained by recovering it from surplus smokeless powder propellants by extraction of non-nitrocellulose materials with a solvent, benzene, in the single-base extraction facility. In addition, off-specification BALL POWDER® propellants are processed to recover nitrocellulose by extraction of non-nitrocellulose materials with benzene in the double-base extraction facility. The waste residue from the extraction operations contains some or all of the following: benzene, di-n-butyl phthalate, dinitrotoluene, diphenylamine and nitroglycerine. These waste residues are disposed of by incineration in our hazardous waste incinerator.

The purchased and recovered nitrocellulose are both processed to form a lacquer by dissolving in ethyl acetate in a batch-operated lacquer make-up step. This lacquer is continuously processed into single-base, hardened spherical grains in the graining step. The aqueous solution used for suspension in the graining step contains bone glue and sodium sulfate which serve specific functions in grain control. The ethyl acetate used to form the lacquer is removed by distillation and recovered by condensation for re-use in the lacquer make-up step. The hardened grains are screened in Size Separation to segregate the grains into specific granulation ranges for further processing.

The next step is the coating operation in which single-base grains are processed, batch-wise, to incorporate nitroglycerine, followed in some cases by the addition of a deterrent for the purpose of energy potential modification and burning rate control. The carrying solvent, ethyl acetate for nitroglycerine, is removed by distillation, and recovered for re-use. Some of these coated powders require rolling to change the surface area and to further modify the burning rate. This is done in the rolling step by flowing the double-base grains in a water slurry between two opposing steel rolls.

The propellant is then dried in continuous flow dryers in which the propellant is contacted with hot air. Graphite is added during the drying operation for static control and improved flow characteristics.

Some powders receive surface coatings for control of ignition and as a flash suppressant. This coating is applied continuously in a rotating drum by the addition of a slurry using isopropyl alcohol as the carrier. In the Sweetie Barrel, a hot water jacket is used to evaporate the alcohol.

The propellant is then blended to meet final ballistic specifications and packed out ready for shipment.

All heat applied throughout the process is provided by steam from two Cleaver Brooks boilers. The boilers are fired with #6 Fuel Oil.

All waste waters from the plant are treated through a 786,000 gpd activated sludge waste treatment facility.

## NORTH SWEETIE BARREL

### PROCESS DESCRIPTION

Surface coating in the North Sweetie Barrel is performed as described below:

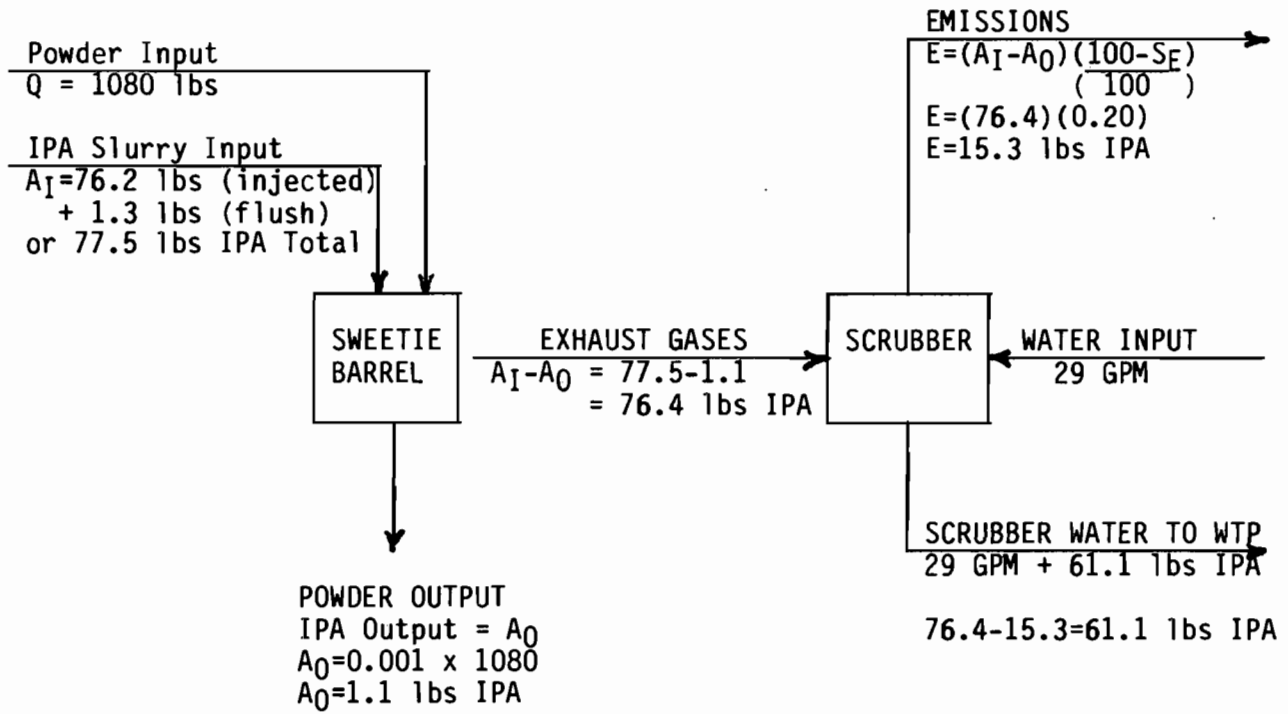
Powder is pneumatically conveyed from a Packout Area to the Sweetie Barrel drum. Graphite is added to the powder in the drum. Air is exhausted from the drum by a fan which draws the exhaust through the scrubber. The powder is heated in the drum with hot water at 65°C in the drum jacket. Surface coating slurry or solution (using isopropyl alcohol, IPA, as the carrier) is slowly injected into the powder. The injection line is cleaned by flushing with IPA into the drum. The powder and coating slurry or solution are then tumbled in the drum smearing the coating on the surface of the powder as the IPA is evaporated and exhausted through the scrubber system. After finishing the required tumble time, more graphite is added. The powder is then cooled with process water in the jacket. After cooling the powder is returned to the Packout Area by being dumped and then pneumatically conveyed. The exhaust fan is then shut down.

The new scrubber will use single-pass process water for scrubbing in order to get the required efficiency. The IPA-laden water will be discharged from the bottom of the scrubber to the area sump, from which it is then pumped to the Wastewater Treatment Plant. Scrubber water flow and exhaust air flow will be monitored to insure that scrubber efficiency is maintained.

One increment of powder will be coated at a time. The increment may be 1080, 1260, or 1440 pounds. The 1080-pound increment utilizes the most IPA and is used as the basis for determining both the instantaneous and yearly IPA emissions. The increment cycle time for a 1080-pound increment may be as short as three (3) hours and the IPA removal period as short as 68 minutes.

IPA MATERIAL BALANCE  
(Per Increment Basis)

SCHEMATIC DIAGRAM





## EMISSION CALCULATIONS

Below are the calculations for determination of emissions for isopropyl alcohol (IPA) and for particulates from the operation of surface coating BALL POWDER® propellant in the St. Marks North Sweetie Barrel facility:

$E$  = IPA emissions, tons per year

$A_I$  = IPA input to Sweetie Barrel, pounds per increment

$A_0$  = Residual IPA in powder after surface coating, pounds per increment

$S_E = 80\%$  = Scrubber efficiency for absorption of IPA vapors from Sweetie Barrel exhaust gases.

$N$  = Maximum number of increments of powder than can be processed in a year

$R_{MAX}$  = Maximum IPA emissions, pounds per hour

$T = 68$  minutes = Minimum cycle time for IPA removal

$T^1 = 3$  hours = Minimum total cycle time for surface coating one increment

$Q = 1080$  lbs = Increment size

$C = 0.1\%$  by weight = Concentration of IPA in powder after surface coating.

1. Maximum Annual IPA Emissions

$$A_I = 76.2 \text{ lbs. (injected)} + 1.3 \text{ lbs (flush)}$$
$$A_I = 77.5 \text{ lbs/increment}$$

$$A_0 = \text{QC, lbs/increment}$$
$$A_0 = 1080 \text{ lbs} \times 0.001$$
$$A_0 = 1.1 \text{ lbs/increment}$$

$$N = (24 \text{ hrs}/T^1 \text{ hrs/increment}) \times (350 \text{ days/year}) = \text{increments/year}$$
$$N = 24/3 \times 350$$
$$N = 2800 \text{ increments/year}$$

$$E = \frac{(A_I - A_0) \left( \frac{100 - S_F}{100} \right) (N) \text{ lbs/year}}{2000 \text{ lbs/ton}}, \text{ tons/year}$$

$$E = \frac{(77.5 - 1.1) \left( \frac{100 - 80}{100} \right) (2800)}{2000}$$

$$E = 21.4 \text{ tons per year}$$

2. Maximum IPA Emission Rate

$$R_{MAX} = \frac{(A_I - A_0) \left( \frac{100 - S_F}{100} \right)}{T}, \text{ lbs/hr}$$

$$R_{MAX} = \frac{(77.5 - 1.1) (0.2)}{68/60}$$

$$R_{MAX} = 13.4 \text{ lbs per hour}$$

3. Potential IPA Emissions (w/o controls)

$$E = \frac{(A_I - A_0) (N)}{2000}, \text{ tons/year}$$

$$E = \frac{(77.5 - 1.1) (2800)}{2000}$$

$$E = 107.0 \text{ tons per year}$$

$$R_{MAX} = \frac{(A_I - A_0)}{T}, \text{ lbs/hour}$$

$$R_{MAX} = \frac{(77.5 - 1.1) \text{ lbs/increment}}{(68 \text{ min}/60 \text{ min/hr})/\text{increment}}$$

$$R_{MAX} = 67.4 \text{ lbs per hour}$$

#### 4. Maximum Particulate Emissions Rate

A test was made on December 5, 1983 on the existing Sweetie Barrel scrubber which is specifically designed for particulate removal. The particulate removal rate was 0.009 pounds per hour. (Particulates consisted of BALL POWDER® dust and graphite. It was not possible to differentiate between them due to the small size of the sample collected, 0.005 grams.)

The IPA scrubber will maintain the 0.009 pound per hour rate, maximum.

#### 5. Annual Particulate Emissions

$$\frac{0.009 \text{ lbs/hr} \times (3 \text{ hrs/increment}) \times (2800 \text{ increments/yr})}{2000 \text{ lbs/ton}}$$

$$= 0.038 \text{ tons per year}$$

#### 6. Particulate Emissions Without Control

Estimates for particulate emissions without controls was based on powder losses of 0.003% observed in pneumatic conveying of BALL POWDER®. This would be considered to be on the high side for the Sweetie Barrel operation.

$$\begin{aligned} \text{Powder Emission Rate} &= 1080 \text{ lbs/increment} \times 0.003\% \\ &= 0.0324 \text{ lbs/increment} \\ &= 0.0108 \text{ lbs/hr of powder over three-hour cycle.} \end{aligned}$$

A 0.1% retention of graphite on the powder is required by quality specifications. Approximately 20% of the graphite added adheres to the powder. Approximately 20% of the graphite that does not adhere to the powder is exhausted to the scrubber.

$$\begin{aligned} \text{Graphite Retained on Powder} &= 1080 \text{ lbs/increment} \times 0.001 \\ &= 1.08 \text{ lbs/increment} \end{aligned}$$

$$\text{Total Graphite Added} = 1.08 / .2 = 5.4 \text{ lbs/increment}$$

$$\text{Graphite Added but Not Retained on Powder} = 5.4 - 1.08 = 4.32 \text{ lbs/inchr.}$$

$$\begin{aligned} \text{Graphite Emission Rate} &= 4.32 \times 0.2 = 0.864 \text{ lbs/increment} \\ &= 0.288 \text{ lbs/hr over three-hour cycle} \end{aligned}$$

$$\text{Particulate Emissions} = 0.0108 + 0.288 = 0.2988 \text{ lbs/hr}$$

$$\text{Annual Particulate Emissions} = \frac{(0.0324 + 0.864 \text{ lbs/increment})(2800 \text{ incr.})}{2000 \text{ lbs/ton}}$$

$$= 1.25 \text{ tons per year}$$



QUOTATION NO. P0337-1

Att: B. Paris  
Purchasing Department  
Olin Corporation  
P. O. Box 222  
St. Marks, Florida 32355

April 22, 1987

This proposal is in response to Olin Corporation Inquiry No. 1997-1 for the supply of an isopropyl alcohol (IPA) scrubber in accordance with Olin's Specification Number S-199771, Revision A. The General Requirements of the specifications indicated the acceptability of either a Venturi scrubber or a toroidal vortex scrubber. Both types of units are now manufactured by Beco Engineering. However, the baffle-vortex scrubber was previously bid to a similar problem at Olin and was not accepted. Accordingly, only the venturi scrubber option is now proposed for the IPA scrubber. The proposed unit is:

A Multi-MicroVenturi (MMV) venturi scrubber with flooded elbow, in series with a second-stage packed column.

#### I. Design Considerations

##### A. Particulate Removal

The major scrubber duty is the removal of the 1 to 4-micron ball-powder/graphite dust load. The dust load at 2% by weight (maximum) of the gas rate is a particularly intense dust load. Although venturi scrubbing is the optimum means of handling the high dust load, the single-stage contact of a venturi will not satisfy the IPA absorption efficiency requirement. Additional downstream absorption capability must be provided in the form of spray or countercurrent packed contacting.

##### B. IPA Recovery

The efficiency of removal of isopropyl alcohol (IPA) from air by once-through water scrubbing is determined by the liquid temperature (equilibrium line) the water/gas ratio (operating line) and the contact efficiency and residence time. At a water scrub rate of 10 G/MCF, the theoretical number of transfer units (NTU) required for the specified 80% IPA removal is 4.0, whereas at 15 G/MCF, an NTU of only 2.1 is needed to meet the 80% removal efficiency specification. Design has been based on the use of 11.5 G/MCF.

The design proposed inherently has a total 4.0 NTU capability at the low water flow limit, so that 80% IPA removal is achievable at nominal water rates at the design ratio, using once-through water scrubbing.

## II. Proposed Equipment: Venturi/Packed Column

The proposed equipment arrangement for the venturi-/packed tower scrubber is shown in Drawing No. P0495-1. The venturi section shall be Beco Engineering's "Multi-MicroVenturi" (MMV) unit, and the second-stage packed section shall be a 36" diameter countercurrent Brush-Pack/Mist-Master unit.

### A. Multi-MicroVenturi:

The venturi design proposed is a new, field-proven, low-pressure-drop enhanced venturi design. The basic component of the Beco Multi-Microventuri (MMV) Scrubber is a "stacked" micro-venturi array, shown in cross-sectional view in the drawing inset. The array is typically a 4-row bank of staggered tubular elements arranged in a pattern similar to a bank of heat exchanger tubes. Thin partitions connect alternate rows of tubes, defining staggered parallel flow channels. In these channels, the tubes cause successive micro-venturi flows at the "pinch" sections. With continuous liquid injection upstream of the array, the multiple venturi contact yields high particulate removal efficiencies at extremely low pressure drop.

The MMV scrubber has been used successfully in a variety of particulate-removal applications; a partial installation list is appended. Although the MMV array is not susceptible to plugging because of its open structure, it is supplied as a removable module, removable through a side access door on the shell.

Water supply to the MMV shall total 15 GPM, with 10GPM supplied as a centrifugally-dispersed wetted-wall wash in the protected annular section between the 12" inlet and the 18" tapered outer shell. It should be noted that the wetted-wall water injection is designed to take place out of the main air stream and out of direct contact with the particulate entering the scrubber.

A secondary spray of 5 GPM shall be injected directly upstream of the MMV module to provide for full wetting of the MMV module. If accumulation of the dry powder on graphite on this spray header is considered to be a potential problem, then the spray can be re-located to the wall as twin side sprays. These nozzles will be in the wetted-wall irrigated zone, so that any particulate will be continuously rinsed off.

The downstream portion of the MMV stage shall be a flooded elbow connecting to the packed column stage. A 2-inch diameter drain nozzle shall be provided for removal of the main gunpowder-graphite particulate.

**B. Packed Column:**

The packed scrubber stage shall be a 36-inch i.d. vessel containing:

- (a) gas entry
- (b) 12-inch deep 304 SS Brush-Pack section,
- (c) Mist-Master mist eliminator/polishing filter
- (d) flanged gas exhaust section.

The packed column stage shall be comprised of a 12" deep bed of Brush-Pack packing and a final Mist-Master high-efficiency mist eliminator, with bi-directional sprays located between the two sections. The packed column has two functions: removal of the mist (i.e., "mud") carried over from the venturi section, and completion of the IPA removal.

Brush-Pack is intrinsically both a high-performance mist eliminator and a very high-surface area packing. Despite the fact that the Brush-Pack bed is only 12" deep in the proposed design, extensive field experience has shown that this depth is more than adequate for the achievement of 98% mist elimination on carryover from below the bed, and the provision of 1.5 to 2.0 NTU with the top spray irrigation rate of 7 GPM. The Brush-Pack shall be Type 304 stainless, with 8-mil filament.

The top Mist-Master stage shall be face-sprayed at a rate of 7 GPM. The Mist-Master provides the final stage of particulate and mist elimination, as well as providing the extended wetted surface area necessary for a final stage of polishing scrubbing for IPA removal.

The scrubber bottom shall be sloped as shown in the drawing, and a fan spray shall be provided for intermittent flushing of the sloped bottom.

The basic design details and operating parameters of the proposed scrubber are summarized in Table 1. Paragraphs 1.0 through 8.0 of the Olin specifications shall apply to the design and supply of the proposed scrubber system. The fabrication of the scrubber vessel shall be in accordance with Olin Standard S-4-6.

TABLE I  
EQUIPMENT SPECIFICATIONS

I. EXIT GAS STREAM (Based on Olin Design Condition II and normal inlet temperature)

GAS FLOW RATE:	2370 ACFM
GAS TEMPERATURE:	84° F.
GAS PRESSURE:	6" W. C. < inlet pressure

II. PRESSURE DROP

Brush-Pack:	1.0" W.C.
Mist-Master:	0.75" W.C.
Venturi:	4.0" W.C.
Entrance and exit losses:	<u>0.25" W.C.</u>
TOTAL	6.0" W.C.

III. WATER FLOW

VENTURI	15 GPM
PACKED COLUMN	<u>14 GPM</u>
TOTAL	29 GPM

The specifications call for the provision of an 8-inch diameter access port for any packed section, while the Brush-Pack shown on the drawing has no direct access port. The depth of the Brush-Pack bed is only 12 inches, and this section shall be supplied as a modular, removable drop-in unit, supported by an annular lip. Because the Brush-Pack module is located only 24 inches from the top flange of the shell, the module can be easily removed for maintenance. However, if the 8-inch access door is preferred, then such a port will be provided, and the Brush-Pack shall be in loose, non-contained conventional packed bed form. The pricing is not affected by the optional modes of packing access.

III. Warranty

Beco Engineering guarantees that the system, when operated under the above specified design conditions, shall remove not less than 80% of the isopropyl alcohol entering the scrubber when the system is operated at Olin's specified design conditions. In addition, the scrubber shall provide minimum fine solids removal efficiencies as follows:

<u>Particle Diameter</u> <u>microns</u>	<u>% Removal</u> <u>Efficiency</u>
4	92
2	66
1	41

In the event the system fails to meet guaranty, the customer shall notify Beco Engineering and shall provide Beco all reasonable opportunity to make corrections. If, after such corrections, Beco shall be unable to bring the system within guaranteed limits, Beco will refund the cost of the system to the customer and the customer shall return the system to Beco.

IV. Price

Price .....\$21,200.00



## TERMS AND CONDITIONS

Price quoted above is FOB point of manufacture and is exclusive of all federal, state, local, municipal or other sales, use, personal property or similar taxes.

Freight charges are estimated at \$1200. Shipment shall be by common carrier.

Delivery shall be 8-10 weeks after drawing approval.

Approval Drawings will be submitted 2 weeks after receipt of written purchase order.

Terms of Payment: 10% with order, 20% on purchaser's receipt of approval drawings, balance net on shipment of equipment. All invoices are payable net on receipt.

Field Supervision: The per diem rate for construction advisory and startup service, if required, is \$425 plus justifiable travel and living expenses for each day the employee is away from his home office. All living and travel expenses will be billed separately at cost and are payable on receipt.

Mechanical Warranty: Beco Engineering warrants that the products sold will be free of defects in material and workmanship provided that operating and maintenance instructions are fully complied with. Beco shall replace or repair, at its sole option, any part or parts which are defective within twelve months following the date of initial utilization, but no later than 18 months following delivery of the equipment to customer. Parts and equipment furnished by others are guaranteed only to the extent of the original manufacturer's guarantee to Beco.

BECO ENGINEERING COMPANY

By   
B. J. Lerner

enc.  
BJL/ws

# Olin

## SPECIFICATION

<b>PLANT</b> St. Marks, Florida	<b>UNIT</b> Olin Defense Systems Group
<b>GENERAL INFORMATION</b>	
<b>1 ITEM NUMBER</b>	SERVICE Water Scrubber IPA and Smokeless
<b>2 NUMBER REQUIRED</b>	Powder Propellant Graphite Fines In Blender Exhaust

TABLE OF CONTENTS  
FAN  
S-1997-2, REVISION A

- 1.0 General Requirements
- 2.0 Service Conditions
- 3.0 Design
- 4.0 Notes

ATTACHMENTS

Motor Specification S-00-6-3, Revision 1  
Painting Specification S-2-6, Revision 1

CAR NUMBER	PO NUMBER	DATE	PURPOSE	BY	CHKD.	APP	SPEC. NUMBER	RE
		5-18-87	FOR INQUIRY	BKP			S-1997-2	0
<b>SUPPLIER</b>							SHEETS 1 OF 3	

1.0 GENERAL REQUIREMENTS

- 1.1 The vendor shall furnish one negative pressure, industrial exhaust fan per this specification and the General Terms and Conditions of the Standard Contract.
- 1.2 The exhaust fan will be used to pull air through a water scrubber.
- 1.3 The exhaust blower will draw the rotating drum dryer air, and isopropyl alcohol (IPA) vapors through a venturi type water scrubber and discharge the air to atmosphere.

2.0 SERVICE CONDITIONS

2.1 Design Service

Gas Handled:	Air**
Flow Rate:	3300 acfm
Inlet Temperature (Normal):	80°F
Inlet Temperature (Maximum)	158°F
Inlet Pressure (Gage):	-10" W.C. (vac)
Gas MW:	28.560 #/# mgle
Gas Density:	0.0697 #/ft. <sup>3</sup>
Particulate Loading:	**
Site Elevation (Above Sea Level):	12 feet

\*\*Normal particulate loading will be minimal amounts of Smokeless Powder Propellant® and trace quantities of graphite dust; see spark proof construction requirements in Section 3.0. In addition, normal conditions will include less than 0.2% volume IPA vapors in the air stream, with potential IPA vapor concentration-excursions to above the lower explosion limit of 2.0% volume. This fan shall also have a fine water spray of less than one gpm at the inlet flange.

2.2 Ambient Air Design Basis

	<u>Dry Bulb</u>	<u>Wet Bulb</u>
Summer	95°F	80°F
Winter	33°F	(saturated)

### 3.0 DESIGN

- 3.1 The fans shall be AMCA, Class A, sparkproof construction. All parts of the fan in contact with the gas handled shall be fabricated of non-ferrous material. The impeller (wheel) shall be a radial type (paddle wheel). Fan flow turn-down shall be a radial type (paddle wheel). Fan flow turn-down shall be to 25% of design flow with discharge throttling.
- 3.2 The fans and drives shall be weatherproof, industrial type construction and will be located out doors.
- 3.3 The fans and drives shall be designed for continuous, 24 hour per day, service.
- 3.4 Unit shall be direct drive and have a slide base motor mount and appropriate shaft/coupling guards. All drive assemblies shall be rated at a minimum 1.5 times the maximum operating force. All guards shall meet OSHA requirements as a minimum.
- 3.5 The fans shall be furnished with inlet and outlet flanges, housing drain with plug, and shall have a cleanout door and gasket.
- 3.6 The units shall be mounted on a painted carbon steel base and shall be shipped factory assembled.
- 3.7 All external metal surfaces other than stainless steel or aluminum shall receive one shop primed as specified in the attached Olin Painting Specification S-2-6, Revision 1.
- 3.8 The motors shall be non-overloading for the winter air condition as specified in Section 2.0.
- 3.9 The motor shall be nominal 1800 rpm, explosion proof, 460 volts, 3 phase, 60 hertz; Class I, Group D, Class II, Group G, Division 1 per Olin Specification S-00-6-3, Revision 3, attached.
- 3.10 Motor starters will be provided by Olin.

### 4.0 NOTES

- 4.1 The equipment shall be free from defects in design, material, and workmanship for a period of 18 months from shipment or 12 months from start-up, whichever occurs first.
- 4.2 If any off-standard conditions are observed upon start-up or during testing, or if equipment fails to meet performance requirements, vendor shall furnish the labor and materials to make changes or replace equipment as required, at his expense.

---

# JAY W. HARNED COMPANY

---

July 9, 1987

OLIN CORP  
P.O. BOX 222  
ST. MARKS, FL 32355

Attention: Mr. Brian Paris - Engineering  
cc: Mr. N. D. Lunn - Purchasing

Subject: EXHAUST BLOWER inquiry #1997-2  
JWH quotation #87QT-830TCBREVA

Gentlemen:

In reference to our conversation of July 8, 1987, we are pleased to confirm the following additional TWIN CITY FAN & BLOWER equipment to our previous quotation dated June 16, 1987.

ITEM 2A:

Quantity - 1, outlet discharge damper constructed with aluminum aero foil blades, stainless steel shafts and aluminum frames to be mounted on previously quoted size 913 RBA industrial exauster.

PRICE NET EXTRA .....\$ 683.00  
REVISED UNIT TOTAL PRICE .....\$3949.00

Please note that delivery will be revised to 5-6 weeks after receipt of order due to discharge damper availability.

We are pleased to offer for your consideration the following recommended spare parts;

Quantity 1 size 913 RBA aluminum wheel .....\$1047.00  
Quantity 1 size 913 RBA mild steel .....\$ 426.00  
shaft with aluminum sleeve

Note: If wheel and shaft are ordered together, wheel will be mounted on shaft and shipped as one unit.

We appreciate the opportunity to quote TWIN CITY FAN & BLOWER CO. equipment on this project. Please contact the writer if we may be of further assistance.

Very truly yours,

JAY W. HARNED CO.



Derek S. Embury  
Sales Representative, Tampa

DSE/mv



# PERFORMANCE CURVE

## TWIN CITY FAN & BLOWER

PROJECT: Olin Corp. St. Marks, FL

FAN I.D.: 913 RBA

TAG #: Exhaust Blower Item # 2

PERFORMANCE

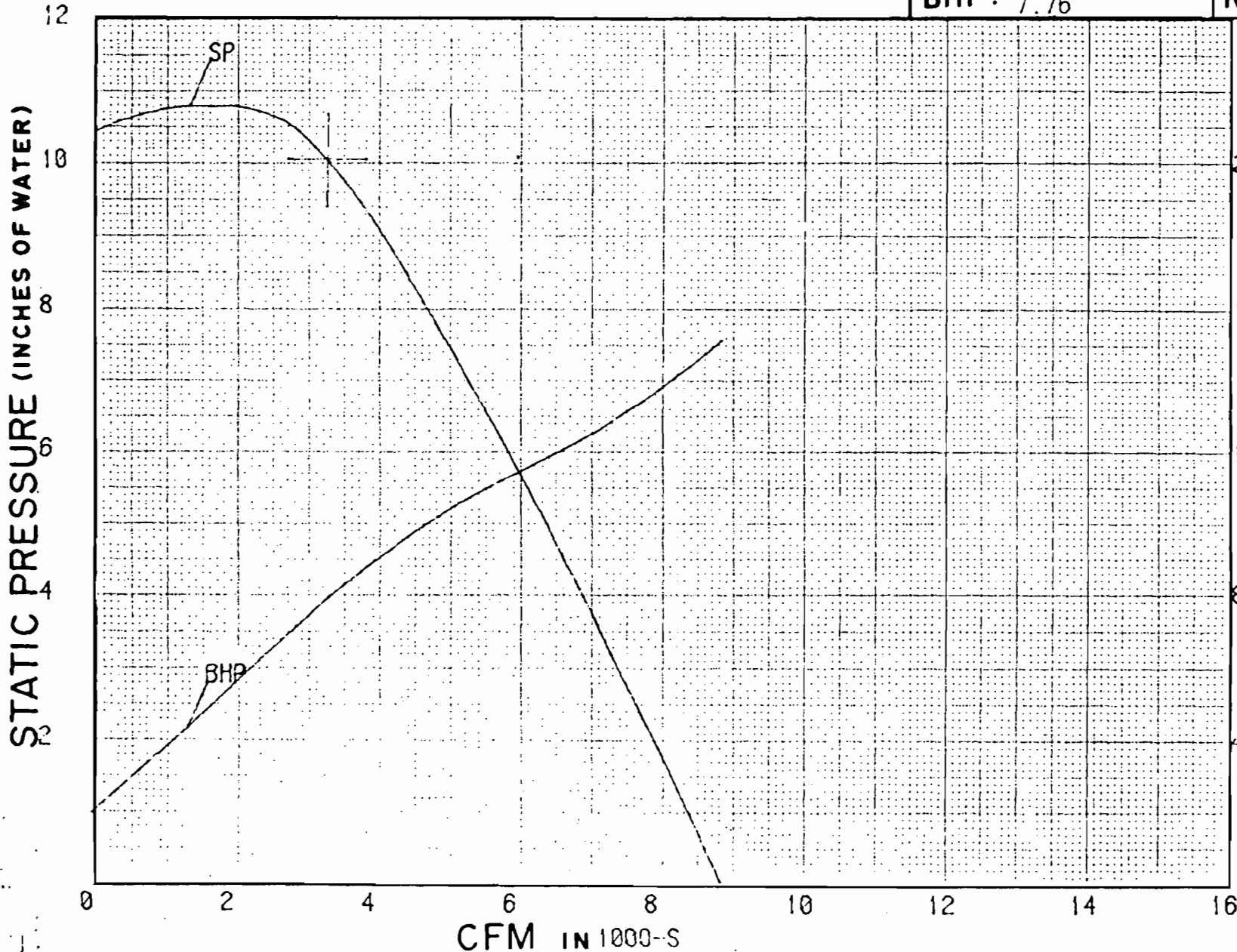
CFM: 3300

SP: 10

BHP: 7.76

RPM: 2007

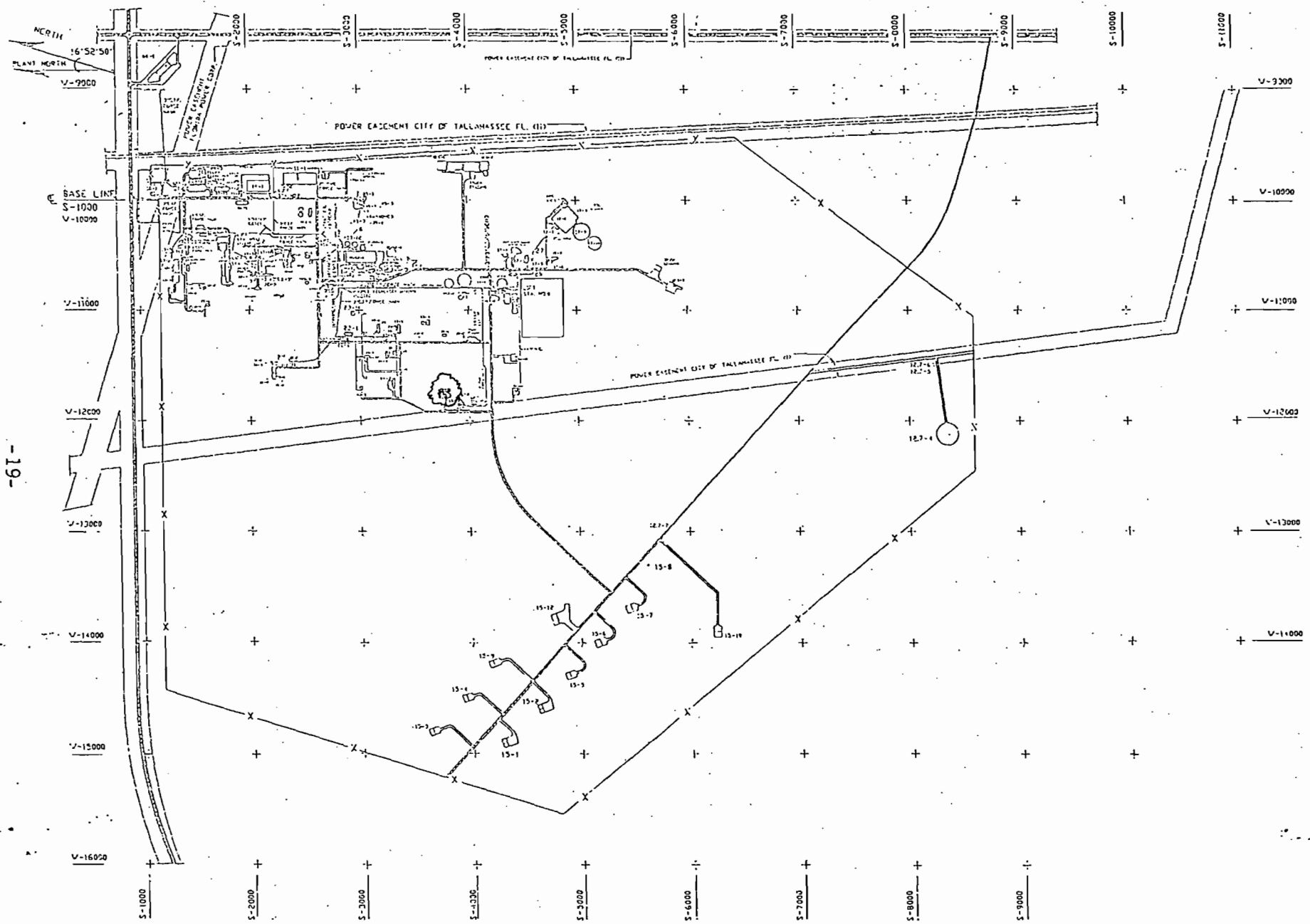
AIR DENSITY =  
0.0690 LB/FT<sup>3</sup>



BRAKE HORSEPOWER

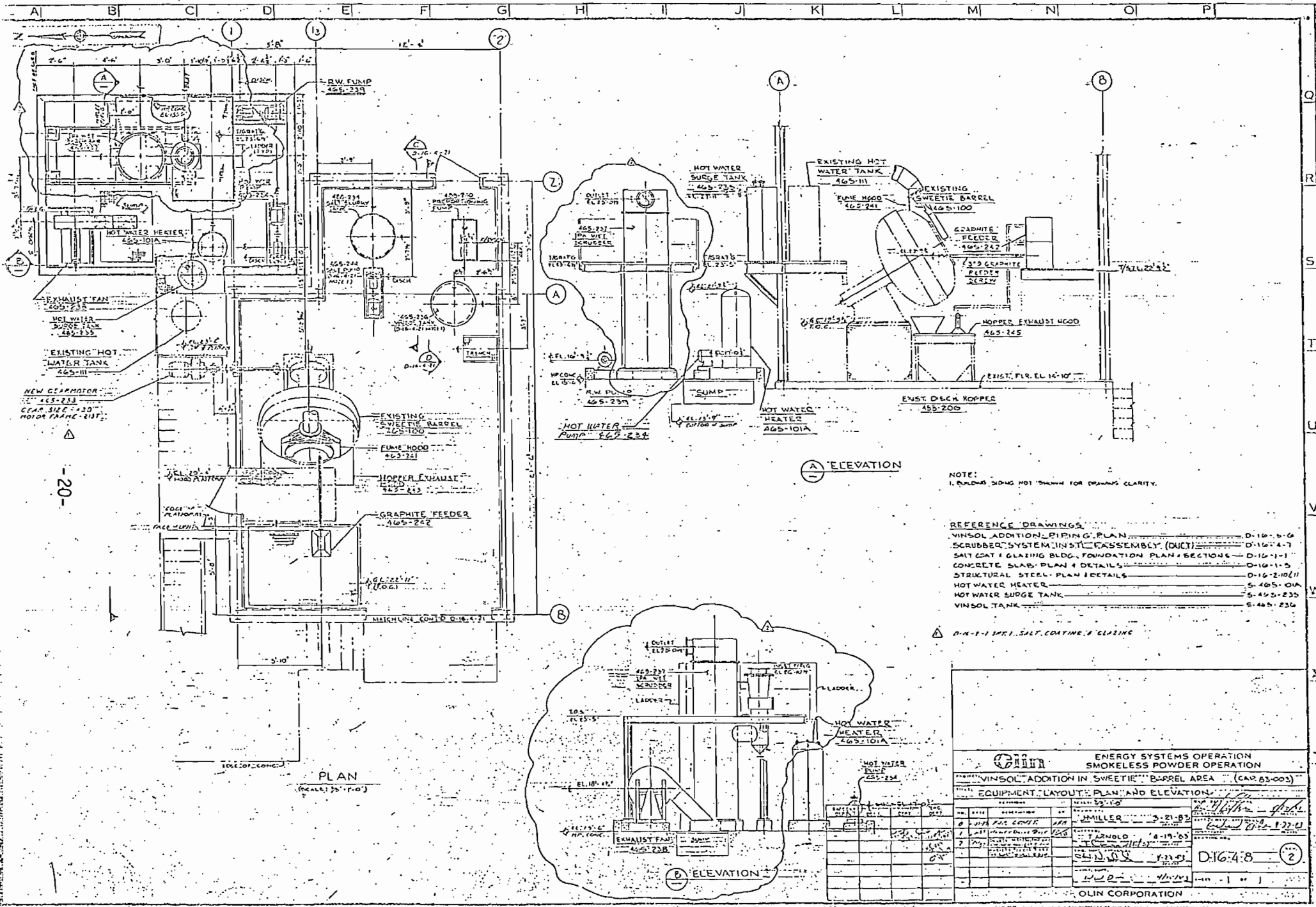
SOUND POWER LEVELS (IN DB REF 10 <sup>-12</sup> WATTS)	
OCTAVE	LEVEL
1	
2	
3	
4	
5	
6	
7	
8	

DATE: 6-15-87  
CN-



-19-





-20-

NOTE:  
1. BUILDING SIDING NOT SHOWN FOR DRAWING CLARITY.

REFERENCE DRAWINGS:

VINSOL ADDITION PIPING PLAN	D-16-5-6
SCRUBBER SYSTEM INST. ASSEMBLY (DUCT)	D-16-4-7
SALT COAT & GLAZING BLDG. FOUNDATION PLAN & SECTIONS	D-16-1-1
CONCRETE SLAB PLAN & DETAILS	D-16-1-5
STRUCTURAL STEEL PLAN & DETAILS	D-16-2-10/11
HOT WATER HEATER	S-465-01A
HOT WATER SURGE TANK	S-465-235
VINSOL TANK	S-465-236

△ D-16-1-1 SPT. SALT COATING & GLAZING

<b>Gain</b>		ENERGY SYSTEMS OPERATION SMOKELESS POWDER OPERATION	
VINSOL ADDITION IN SWEETIE BARREL AREA (CAR 83-003)			
EQUIPMENT LAYOUT PLAN AND ELEVATION			
NO.	DATE	DESCRIPTION	BY
1	3-21-83	MILLER	3-21-83
2	4-19-83	YENOLD	4-19-83
3	5-13-83	YENOLD	5-13-83
4	11-13-83	YENOLD	11-13-83
REVISIONS			DATE
1. REVISED FOR			11-13-83
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99. REVISED FOR			11-13-83
100. REVISED FOR			11-13-83

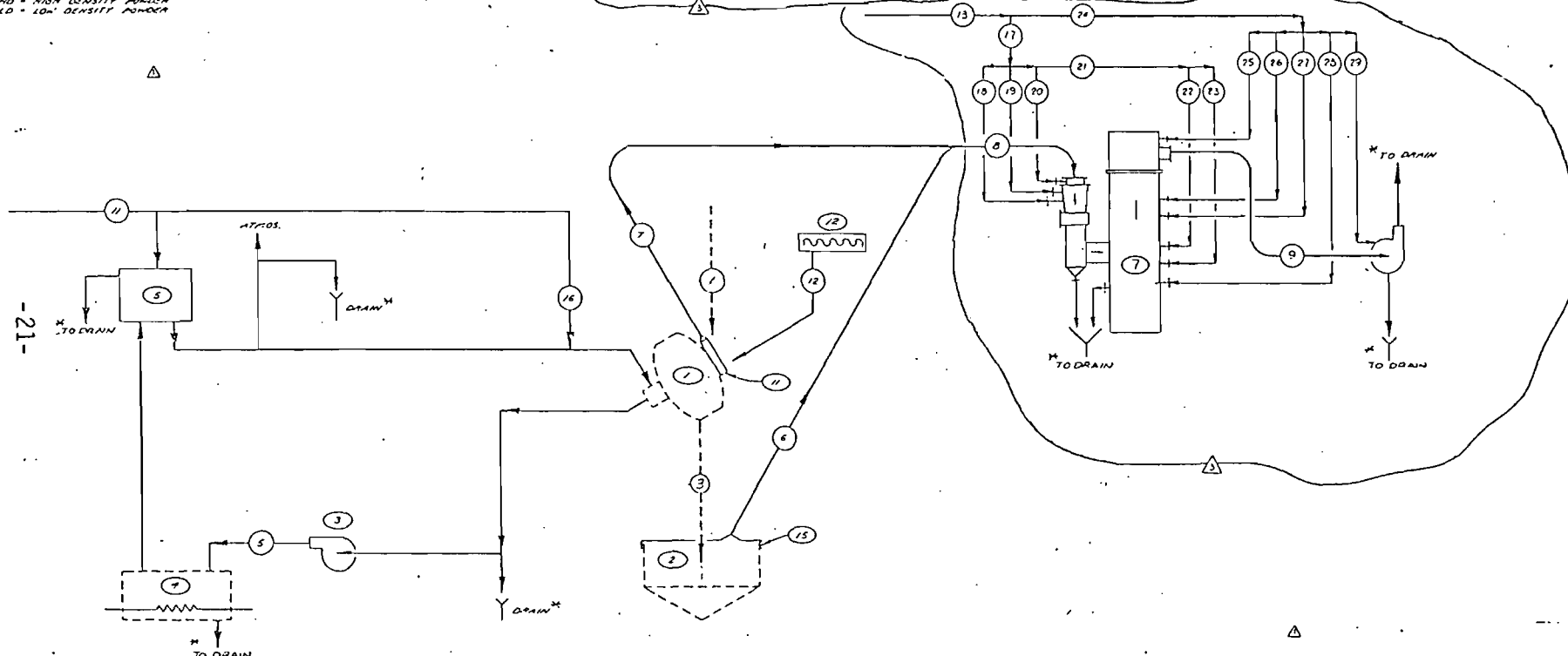
NOTE: 1. BUILDING SIDING NOT SHOWN FOR DRAWING CLARITY.

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LINE NO.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41						
MATERIAL	RAW		FOFFD POWDER		NOF WATER	FINES/ AIR	NOF WATER	NOF WATER	AIR		PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER	PROCESS WATER																		
LBS./MIN.	NS				22.5	22.5	22.5	22.5	247.5		333					12	42	42	53	53	53	53	20	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42				
GPM/CFM				40GPM	40GPM	40GPM	40GPM	330CFM	330CFM				40			70GPM	21.50PM	5GPM	5GPM	5GPM	5GPM	5GPM	4GPM	2.5GPM	1.5GPM	3GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM	5GPM				
TEMP °F/°C	AMB		AMB		128/70	AMB	AMB	AMB	AMB		AMB	AMB	AMB			AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB	AMB			
PSIG.				24							50		50			5	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50			
SPEC. GRAVITY	1.25/1.6		1.2/1.6		.98						1.0		1.0			1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0			
VISC. CBS				1.0							1.0		1.0			1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1		
% SOLIDOS (WT)	100		100								100																																				
LBS./BATCH	40000										4000																																				

ND = MAIN DENSITY POWDER  
LD = LOW DENSITY POWDER



EQUIP. NO.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
DESCRIPTION	SWIRLER	DECHARGE	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER	NOFFER
REMARKS															

ENERGY SYSTEMS OPERATION  
SMOKELESS POWDER OPERATION

SYMBOL ADDITION IN SHEETS ANTWERP 16 (CAR B3-C3)

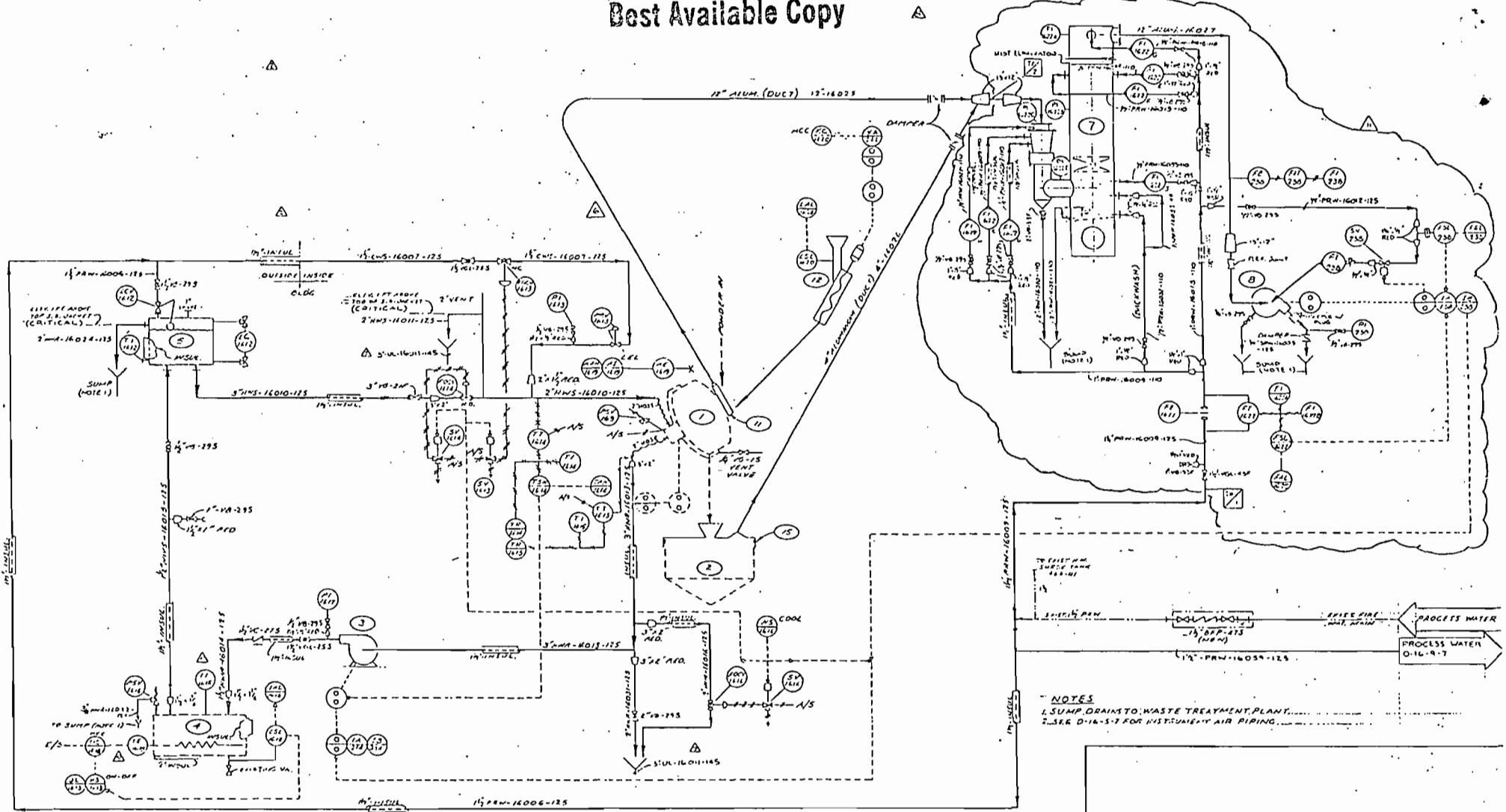
### FLOW DIAGRAM

NO.	REV.	DESCRIPTION	DATE	BY
1	1	FOR CONS. 111	11/15/44	J.H. BISHOP
1	1	FOR CHG. REV.	11/15/44	J.H. BISHOP
1	1	FOR CHG. REV.	11/15/44	J.H. BISHOP
1	1	FOR CHG. REV.	11/15/44	J.H. BISHOP
1	1	FOR CHG. REV.	11/15/44	J.H. BISHOP

DATE: 11-15-44  
BY: J.H. BISHOP  
PROJECT: O-15-9-4

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NOTES  
 1. SUMP DRAINS TO WASTE TREATMENT PLANT.  
 2. SEE D-14-S-7 FOR HISTORICAL AIR PIPING.

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EQUIP. NO.	#65-100	#65-101A	#65-101B	#65-101C	#65-101D	#65-101E	#65-101F	#65-101G	#65-101H	#65-101I	#65-101J	#65-101K	#65-101L	#65-101M	#65-101N	#65-101O	#65-101P
DESCRIPTION	SHEET METAL	DISCHARGE	WATER	WATER	WATER	INSUL	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
REMARKS	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING	EXISTING

**OLIN** ENERGY SYSTEMS OPERATION  
 SMOKELESS POWDER OPERATION  
 P&ID DIAGRAM PROCESS & UTILITY

DATE: 01-16-95  
 DRAWN BY: [Signature]  
 CHECKED BY: [Signature]  
 APPROVED BY: [Signature]

OLIN CORPORATION

NOTE: [Additional notes or specifications]