Solutia Inc.
Pensacola Plant
Facility ID No.: 0330040
Escambia County

Air Construction Permit
Permit No.: 0330040-016-AC

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

electronic file name: 0330040-016-AC]

Air Construction Permit
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Permittee:
Solutia Inc.

Permit No.: 0330040-016-AC
Facility ID No.: 0330040
SIC Nos.: 28, 2824
Project: Emission Unit Consolidation

This construction permit is for the reclassification of several emission units at the Pensacola Plant located at 3000 Old Chemstrand Road, Gonzalez, Escambia County; UTM Coordinates: Zone 16, 476 km East and 3385 km North; Latitude: 30° 35' 56" North and Longitude: 87° 15' 01" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions

Effective Date: August 28, 2000
Expiration Date: August 28, 2005

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

_____
Ed K. Middleswart, P.E.
Air Program Administrator

EKM/rb

Section I. Facility Information.

Subsection A. Facility Description.

Solutia makes nylon and various nylon intermediate chemicals. This facility consists of several raw materials barge, train and truck offloading and storage operations; chemical unit process plants which make the chemical feedstocks and intermediates and the nylon resins; a yarn plant to make finished yarn product; and, boilers and a cogeneration unit to provide process steam and plant electricity. Solutia also operates a maleic anhydride facility which is not part of the nylon process. The maleic anhydride facility is owned by Huntsman.

The purpose of this construction permit is for the consolidation and/or reclassification of several emission units and clarification of permitting language before incorporating the permit conditions into the facility's Title V permit.

Subsection B. Relevant Documents.

The document listed below is not a part of this permit; however, it is specifically related to this permitting action.

This document is on file with permitting authority:
Construction Permit Application received June 16, 2000.

Section II. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Brief Description
001	Electric Motor Pyro1ysis Oven
030	Pyrolysis Cleaning Oven, Area 524, 254A
031	Pyrolysis Cleaning Oven, Area 524, 254B
053	Two Pyrolysis ovens, Spinning Equipment --529 Area
054	Incinerator, Chemical Process Equipment
059	Vydyne Pyrolysis Oven (inactive)
067	Nylon Polymerization Equipment Incinerator
012	Pyrolysis Cleaning Furnace, Area 59 - spin packs
069	Pyrolysis Cleaning Furnace, Area 59 - spin packs
044	Nylon Drying Facility
028	Polymer Fines Removal System
045	Adipic Acid Packaging Facility
051	Adipic Acid Bulk Loading No. 2, Building 372
065	Product Separator, Building 465
066	Alternate Conveyor, Building 465
052	Adipic Acid Transfer System, Building 465
080	Adipic Acid Loading System, Building 465
047	Nylon Vydyne Resin Process, Mixing operation (process step 1)
070	Nylon Vydyne Resin Process, Resin extrusion (process step 2)
071	Nylon Vydyne Resin Process, Aluminum silicate storage silo
072	Nylon Vydyne Resin Process, Mineral weigh hopper.
055	Butane Barge Unloading
068	Cryogenic Ammonia Handling
077	Dimethyl Ester Production

A.1. These emission units have no specific emission limiting standards and are classified as insignificant due to low potential emissions.
[Rule 62-213.430(6), F.A.C.]

A.2. All emission control devices shall be properly operated and maintained. Circumvention of any pollution control device is prohibited. These emission units shall be re-evaluated for rule applicability at the time of Title V renewal.
[Rule 62-210.650, F.A.C.]

Subsection B. This section addresses the following emissions units.

E.U. ID No.	Brief Description
073	Abrasive Blast Facility
038	Research and Development
050	Adipic Acid Bulk Loading No. 1, Building 346

B.1. These emission units have no specific emission limiting standards and are classified as unregulated. [Rule 62-4.160(2), F.A.C.]

B.2. All control devices shall be properly operated and maintained. Circumvention of any pollution control device is prohibited. These emission units shall be re-evaluated for rule applicability at the time of Title V renewal.
[Rule 62-210.650, F.A.C.]

Subsection C. This section addresses the following emissions units.

E.U. ID No.	Brief Description
014	C. E. Boiler No.4
015	C. E. Boiler No.5
016	C. E. Boiler No.6

C.1. The capacity and supplemental fuel usage for these emission units is changed as follows:

Capacity. The aggregate maximum operating rate is 723 MMBtu per hour for Boilers 4, 5 and 6 with no individual boiler limits. During periods of outage of the cogeneration, boilers 4, 5 and 6 may operate at a combined maximum operating rate of 864 MMBtu per hour. Records of heat input shall be maintained and made available for Department inspection. {Permitting note: The capacity limitations have been placed in the permit to identify the capacity of each unit for the purpose of confirming that emissions testing is conducted within 90 to 100 of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for capacity limitations. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emissions tests. Such capacity determinations may be based on measurements of process inputs, flow measurements and/or other data to calculate average hourly capacity.}
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Supplemental Fuels. The following supplemental fuels may be burned in boilers 4 and/or 5 in conjunction with burning of gas or fuel oil:
1. AGS, a mixture of organic acids extracted from the deep well waste stream, up to 8,000 pounds per hour, and/or
2. KATT composite fuel, consisting of KATT (Ketone Alcohol Topper Tails), DME (mixture of Dimethyl Esters), Amines (from nylon and nylon intermediates manufacturing) and Area 480 residue (a mixture of alcohol and ketone by-products) up to 10,000 pounds per hour.
3. These fuels may only be burned in Boiler 4 and/or 5. Records shall be maintained of the supplemental fuel quantities burned. A request may be made by the Department to periodically sample and analyze supplemental fuels. The supplemental fuels shall be sampled and results submitted with the application for renewal of this permit.
[Rules 62-4.070, 62-4.160(2) and 62-213.440(1), F.A.C. and 40 CFR 279.11]

Subsection D. This section addresses the following emissions units.

E.U. ID No.	**Brief Description**
060	Adipic Acid 485 BEPEX Dryer
061	Adipic Acid Dryer 405-A
062	Adipic Acid Dryer 405-B
063	Adipic Acid Dryer 465-A
064	Adipic Acid Dryer 465-B
079	Adipic Acid 485 NIRO Dryer

D.1. The maximum operating rate of these emission units is changed as follows:

Dryer	EU-061 405A	EU-062 405B	EU-063 465A	EU-064 465B	EU-060 Bepex	EU-079 Niro
Exhaust air blower horsepower,(HP)	50	50	75	75	50	100
Exhaust air blower, design maximum flowrate, (SCFM, hourly average basis, as determined by EPA method 2 stack test)	8000	8000	10500	10500	10,200	10,500
Dryer exhaust scrubber, water minimum circulation flowrate (GPM, hourly average basis)	3000	3000	3000	3000	5500	NA
Exhaust air, bag filter capacity	NA	NA	NA	NA	NA	2600+ Sq. Ft. filter area
Discharge air, design basis particulate concentration (grains/SCF)	0.10	0.10	0.10	0.10	0.015	0.015

NA = not applicable
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Subsection E. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
020	Cyclohexane Oxidation Process

E.1. The capacity of this emission unit is changed as follows:

Capacity. The maximum allowable operating rate for the Cyclohexane Oxidation Process is 82,000 pounds per hour process air.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C. and AC17-247476]

Subsection F. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
002	Area II Adipic Acid Expansion - TRU/SCR1; existing TRU and new SCR (or equivalent) - SCR2; Backup new SCR (or equivalent) - Process Equipment; Product Synthesis, Refining and Raw Material Recovery

F.1. The capacity of this emission unit is changed as follows:

Capacity. The maximum allowable operating rates for each, the TRU/SCR1, and the SCR2, shall not exceed the rate of all combined process gases from the Area 471 gas phase hydroxylation reaction and product refining and raw material recovery processes, the Area I HALCON stream, and the Area II process gases, generated at the Area 471 maximum operating rate of 55,000 lbs Phenol/hr (hourly average basis), the Area I maximum operating rate of 82,000 lbs process air/hr (hourly average basis), and the Area II maximum operating rate of 119,059 lbs KA feed/hr (hourly average basis). {Permitting note: The capacity limitations have been placed in the permit to identify the capacity of each unit for the purpose of confirming that emissions testing is conducted within 90 to 100 of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for capacity limitations. Instead, the owner or operator is expected to determine adipic acid production rate whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emissions tests. Such capacity determinations may be based on measurements of process inputs, flow measurements and/or other data to calculate average hourly capacity.}
[Rules 62-4.030, 62-4.070(3), 62-4.160(2) and 62-210.200(PTE), F.A.C. and permit 0330040-11-AC]

Subsection G. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
040	Hexamethylene Diamine Synthesis
041	B and C Hexamethylene Diamine Stripper Distillation Column

G.1. DELETE:
Capacity. The maximum allowable feed rate for the B stripper column is 25,000 lb/hr of HMD feed material.
[Rules 62-4.070, F.A.C. and permit 0330040-004-AC]

Subsection H. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
076	Maleic Anhydride (MA) Plant

H.1. The capacity of this emission unit is changed as follows:

Capacity. The maximum gas flow rate from the maleic anhydride to each boiler shall not exceed 6.5 MMscf/hour (13.0 MMscf/hour total to both boilers). {Permitting note: The capacity limitations have been placed in the permit to identify the capacity of each unit for the purpose of confirming that emissions testing is conducted within 90 to 100 of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for capacity limitations. Instead, the owner or operator is expected to determine maximum gas flow rate to boiler 7 & 8 whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emissions tests. Such capacity determinations may be based on measurements of process inputs, flow measurements and/or other data to calculate average hourly capacity.}
[Rules 62-4.160(2), 62-213.440(1), F.A.C. and permit AC17-250268]

Subsection I. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
081	Continuous Nylon Polymerization Lines
082	Batch Nylon Polymerization

I.1. DELETE:
The maximum allowable pre- and post-construction operating rates are noted on Company Confidential Table 2 attached to the construction permit application received November 28, 1995 and included in the confidential file. This is the operating rate at which compliance with the limits specified in specific condition No. 7 shall be demonstrated.
[FAC Rule 62-4.070, and Construction Permit 0330040-001-AC]

Subsection J. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
042	Nitric Acid Plant E

J.1. The capacity of this emission unit is changed as follows:

Capacity. The maximum allowable operating rate is 1500 tons of 100% nitric acid produced per day. {Permitting note: The capacity limitations have been placed in the permit to identify the capacity of each unit for the purpose of confirming that emissions testing is conducted within 90 to 100 of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for capacity limitations. Instead, the owner or operator is expected to determine nitric acid production rate whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emissions tests. Such capacity determinations may be based on measurements of process inputs, flow measurements and/or other data to calculate average hourly capacity.}
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C. and permit 0330040-003-AC]

J.2. The maximum allowable emission rate for NOx is changed as follows:

The maximum allowable annual emission rate for NOx is 3.00 lb/Ton of 100% HNO3. The maximum allowable annual NOx emissions are 360 tons of NOx per year based on a 365 day rolling total amount as determined by the CEMs data and stack flow rate.
[Rule 62-4.070, F.A.C., 40 CFR 60.72(a)(1) and permit 0330040-003-AC]

Subsection K. This section addresses the following emissions unit.

Emission Unit ID No. 097

40 CFR Part 60, Subpart Kb Volatile Organic Liquid (VOL) Tanks Inventory - 5/23/2000				
[for tanks constructed, modified or reconstructed after July 23, 1984, with volumes over 10,600 gallons, which are subject to 40 CFR Subpart Kb, VOL Tank regulations]				
Tank Number	Facility ID Number	Tank Volume (Kgal)	Tank Contents	NSPS Applicability
326TA115A	UIC permit	1000	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
326TA115B	UIC permit	1000	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
326TA115C	UIC permit	1000	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
326TA115D	UIC permit	1000	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
326TA119	UIC permit	6000	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
326TA171	UIC permit	12	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
326TA172	UIC permit	120	process wastewater	Subject to Kb recordkeeping but exempt due to low vapor pressure of VOC
403TA50	2	108.5	Adipic Glutaric, Succinic acids and water	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
465TA6	2	300	Adipic acid, nitric acid , water	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
461TA60	20	87	Boric acid and water solution	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
461TA151	20	60	KATT residue	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
416TA284D	40	49.5	Adiponitrile	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
416TA291	40	49.5	Adiponitrile	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
442TA33A	40	850	Adipinitrile	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
442TA33B	40	850	Adipinitrile	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
486TA19	77	35.8	Methanol	Subpart Kb requirements met by use of floating roof design.
416TA316	77	17.7	Dimethyl esters	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
416TA470	77	27	Dimethyl esters	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
416TA473	77	18.1	Dimethyl esters	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
416TA480	77	17.7	Dimethyl esters	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC

416TA482	77	17.7	Dimethyl esters	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
443TA001A	76	165	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
443TA001B	76	165	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
443TA001C	76	83	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
445TA024	76	105	Process Oil	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
445TA067A	76	62	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
445TA067B	76	62	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
445TA085A	76	37	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC
445TA085B	76	37	Maleic Anhydride	Subject to Kb recordkeeping but exempt due to size and/or low vapor pressure of VOC

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

K.1. Hours of Operation. These emissions units may operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

K.2. NSPS Provisions. The owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.
[Rule 62-204.800(7)(b)16., F.A.C.; 40 CFR 60.116(b)]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. 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 acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

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

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are 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 this 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 provide the Department with the following information:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- 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.

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

In the Matter of an
Application for Permit by:

Permit No.: 0330040-016-AC
Escambia County

J. C. Ochsner, Plant Manager
Solutia Inc.
P O Box 97
Gonzalez FL 32560-0097
_____/

INTENT TO ISSUE PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit enclosed) for the source detailed in the application specified above, for the reasons stated below.

The applicant, Solutia Inc., applied on June 15, 2000, to the permitting authority for an air construction permit for the Pensacola Plant located at 3000 Old Chemstrand Road, Gonzalez, Escambia County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. This source is not exempt from permitting procedures. The permitting authority has determined that an air construction permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE PERMIT." The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, Northwest District, 160 Governmental Center, Pensacola, FL 32501-5794 (Telephone: 850/595-8364; Fax: 850/595-8417), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the permit, in accordance with the conditions of the enclosed DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will issue the permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3900 (Telephone: 850/488-9735; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

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

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

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

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

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;

(c) Each rule or portion of a rule from which a variance or waiver is requested;

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

(e) The type of action requested;

(f) The specific facts that would justify a variance or waiver for the petitioner;

(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Pensacola, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

_____

ED K. MIDDLESWART, P.E.
Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on _____ to the person(s) listed:

J. C. Ochsner, Solutia Inc.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail or electronically transmitted on the same date to the person(s) listed:

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT
I.D. Number 0330040-016-AC

The Department of Environmental Protection gives notice of its intent to issue an air construction permit to Solutia Inc., for the consolidation and/or reclassification of several emission units at their Pensacola Plant located at 3000 Old Chemstrand Road, Gonzalez. These permit modifications will not result in any actual increase of air emissions.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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

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

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except for legal holidays, at the Northwest District, 160 Governmental Center, Pensacola, Florida.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit
By:
J. C. Ochsner, Plant Manager
Solutia Inc.
P O Box 97
Gonzalez FL 32560-0097
_____/

DEP File No. 0330040-016-AC
Escambia County

Enclosed is Permit Number 0330040-016-AC, issued pursuant to Section 403.087, Florida Statutes.

Any party to this Order (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, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, 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 Notice is filed with the Clerk of the Department.

Executed in Pensacola, Florida.

State of Florida Department
of Environmental Protection

_____
ED K. MIDDLESWART, P.E.
Air Program Administrator

160 Governmental Center
Pensacola, Florida 32501-5794
(850) 595-8364

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department clerk, receipt of which is hereby acknowledged.

Clerk Date

Copies Furnished to:
FDEP Bureau of Air Regulation, Tallahassee

MEMORANDUM

TO : Ed K. Middleswart, P.E.
FROM : Andy Allen, Rick Bradburn
DATE : 09/13/00
SUBJECT : Evaluation Summary for Solutia Inc., Pensacola Plant
0330040-016-AC, Escambia County

We recommend issuing an intent to issue a construction permit to Solutia Inc. for operational modifications to their facility.

Facility Description**.**
Solutia makes nylon and various nylon intermediate chemicals. This facility consists of several raw materials barge, train and truck offloading and storage operations; chemical unit process plants which make the chemical feedstocks and intermediates and the nylon resins; a yarn plant to make finished yarn product; and, boilers and a cogeneration unit to provide process steam and plant electricity. Solutia also operates a maleic anhydride facility which is not part of the nylon process. The maleic anhydride facility is owned by Huntsman.

The purpose of this construction permit is for the consolidation and/or reclassification of several emission units and to clarify permitting language before incorporating the permit conditions into the facility's Title V permit.

Emission Unit Modifications. See attached Supplemental Construction Permit summary and Supplemental Comments to Draft Title V Permit.

Fee Summary. This is a multiple source permit application (AC/OO, $4,000).

rb:rbc

Part II
Supplemental Construction Permit Application

Emission Unit Consolidation and Classification of Unregulated Emission Units

Solutia, Inc. is proposing to clarify permitting language, consolidate conditions and re-classify existing emission units at the Pensacola Plant for the purpose of streamlining the Title V Operating Permit. The requested changes focus on emission units that may be regulated by specific numerical emission limits, but due to their characteristics have emissions that classify the emission unit as insignificant. While many of these emission units received previous construction permits, the requested conditions reflect the insignificant nature of the units. In addition, Solutia desires to consolidate several conditions for "like-kind" emission units to allow operational flexibility and ease of compliance.

The information contained in Section III. Emissions Unit Information of DEP Form No. 62-210.900(1) has been previously submitted as part of previous construction and operation permit applications as well as the Title V application. The descriptions that follow provide the rationale for the proposed consolidation and regulatory classification.

Emission Units 014 (Boiler 4), 015 (Boiler 5) and 016 (Boiler 6) – These emission units are being included in a supplemental air construction permit to consolidate the capacity of these existing emission units. A combined capacity of 723mmBtu/hr is requested, with no individual heat input limit on any boiler. A combined capacity of 864 mmBtu/hr heat input only during outages of the cogeneration facility is requested to be continued. Records would be kept for usage during outages of the cogeneration facility. The use of Area 480 residue is requested to be included as a supplemental fuel, along with other supplemental fuels, for boilers 4 and/or 5. Information on the composition of Area 480 residue was provided to the Department in a letter dated May 1, 2000. The information demonstrates that its fuel quality is superior in the quality to that of No. 6 fuel oil. In addition, the boilers are capable of burning this fuel.

Emission Units 001, 030, 031, 053, 054, 059, 067, 012 and 069 (Pyrolysis Cleaning Ovens)- Emission Units 001, 030, 031, 053, 054, 067, 012 and 069 are being included in this supplemental air construction permit to classify these units as insignificant emission units due to their size. While these units received previous air construction permits, there are no specific emission limiting standards that are applicable in the Department's Rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The previous air construction permits issued are: AC17-184414 (EU-001), AC17-207576 (EUs-030 and 031), AC17-136188 (EU-059), AC17-104180 (EU-067) and AC17-142980 (EUs-012 and 069). These units have automatic controls that insure proper operation including regulation of the afterburners. Emission estimates using emission factors developed for a similar unit burning wire were developed and are presented in the attached table. The wire burner has an afterburner and similar controls. The emission estimates are conservative since the wire burner would process material with a greater potential for emissions than the material processed by Solutia. (i.e., wire insulation versus residues from nylon manufacturing). It was also assumed in the calculations that the units operate 8,760 hours per year, which is conservative. The Department's rules regarding circumvention of pollution control equipment and proper operation (Rule 62-210.650 F.A.C.) would be applicable.

Emission Units 060, 061, 062, 063, 064 and 079 (Adipic Dryers) – For all the Emission Units, an alternate capacity is being proposed for each dryer, as a basis for the compliance test. The proposed dryer capacities are the airflow rate determined by motor horsepower and blower capacity. A grain loading will be proposed for Emission Units 061, 062, 063 and 064. Emission Units 060 and 079 have grain loading emission limits. The following table is proposed to be included as a permit limit.

Dryer	EU-061 405A	EU-062 405B	EU-063 465A	EU-064 465B	EU-060 Bepex	EU-079 Niro
Exhaust air blower horsepower,(HP)	50	50	75	75	50	100
Exhaust air blower, design maximum flowrate, (SCFM, hourly average basis, as determined by EPA method 2 stack test)	8000	8000	10500	10500	10,200	10,500
Dryer exhaust scrubber, water minimum circulation flowrate (GPM, hourly average basis)	3000	3000	3000	3000	5500	NA
Exhaust air, bag filter capacity	NA	NA	NA	NA	NA	2600+ Sq. Ft. filter area
Discharge air, design basis particulate concentration (grains/SCF)	0.10	0.10	0.10	0.10	0.015	0.015

NA = not applicable

Emission Unit 073 (Abrasive Blast Facility) – This emission unit is being included in this supplemental air construction permit to classify the unit as unregulated emission unit. The potential emission from this emission unit is controlled by a baghouse. While this unit received a previous air construction permit (AC17-148294), there are no specific emission limiting standards that are applicable in the Department's Rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The Department's rules regarding circumvention of pollution control equipment and proper operation (Rule 62-210.650 F.A.C.) would be applicable.

Emission Unit 051 (Adipic Acid Bulk Loading 372); and Emission Unit 080 (Adipic Acid 373 Dust Collector) [Note that the name Adipic Acid Loading System, Building 465 was misnamed, EU 080 is associated with 373]. These emission units are being included in this supplemental air construction permit to classify the units as insignificant emission units. The potential emission from these emission units is less than 5 tons/year each. They are controlled by a bag filters and have potential emissions less than 5 tons/year of particulate matter. While Emission Unit 051 received a previous air construction permit (AC17-7899) and Emission Unit 080 received a previous air construction permit (AC17-262484), there are no specific emission limiting standards that are applicable in the Department's Rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The Department's rules regarding circumvention of pollution control equipment and proper operation (Rule 62-210.650 F.A.C.) would be applicable.

Emission Unit 047 (Nylon Vydne Resin Process-mixing operation) – This emission unit is being included in this supplemental air construction permit to classify the unit as an insignificant emission unit. The current potential emissions are based on the process weight table. A maximum grain loading and flow rate is requested that would classify this emission unit as an insignificant emission unit. A grains loading of 0.03 grains/scf and a flow rate of 4,300 acfm are requested as limits. The potential emission from these maximum design limits is 1.1 lb/hr and 4.8 tons/year and is controlled by a baghouse. Note that the last particulate test conducted in June 1997 found emissions of 0.0034 grains/scf. With this limit there are no specific emission limiting standards that are applicable in the Department's Rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The Department's rules regarding

circumvention of pollution control equipment and proper operation (Rule 62-210.650 F.A.C.) would be applicable.

Emission Units 005 (Vaporizer No. 1), 007 (Vaporizer No. 2), 008 (Vaporizer No. 3), Units 009 (Vaporizer No. 4), 010 (Vaporizer No. 5), 011 (Vaporizer No. 6), 013 (Vaporizer No. 7), and 075 (Vaporizer No. 8) – These emission units are being included in a supplemental air construction permit to request a combined capacity of 136 mmBtu/hr heat input total for all vaporizers, with no individual limit for any vaporizer. Natural gas is the primary fuel used in these vaporizers with 0.5% sulfur No. 2 distillate oil authorized for emergency backup. These emissions units do not have specific emission limiting standards that are applicable in the Department's Rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The record-keeping requirements of the NSPS Subpart Dc are applicable to EU 075 (Vaporizer No. 8). However, there are no Subpart Dc emission limiting standards applicable to the unit.

Emission Unit 020 (Cyclohexane Oxidation Process) – This emission unit is being included in this supplemental air construction permit to remove the capacity limitations except for determining potential to emit and capacities during testing. While this emission unit has a maximum capacity limitation in the air construction permit of 82,000 lb/hr (AC17-247476), there is not a limitation of the liquid feed rate of KA. Since the applicable NSPS Subpart NNN requirements are not based on capacity, the capacity should be used in determining potential to emit and compliance with Subpart NNN during testing. This is consistent with the requirements of the NSPS for performance tests (40 CFR Section 60.664).

Emission Unit 002 (Adipic Acid Process) - The following permitting note is being requested to be included in the supplemental construction permit as related to Condition A.1.a and A.1.b of permit 0330040-11-AC. {Permitting note: The capacity limitations have been placed in the permit to identify the capacity of each unit for the purpose of confirming that emissions testing is conducted within 90 to 100 of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for capacity limitations. Instead, the owner or operator is expected to determine production rates whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emissions tests. Such capacity determinations may be based on measurements of process inputs, flow measurements and/or other data to calculate average hourly capacity.}

Emission Unit 032 (Cogeneration Plant) - A change of the construction permit is requested to include the Subpart Db and Subpart GG testing requirements as identified in the May 1, 2000 letter. The compliance test method for NOx is requested to be EPA Method 7e rather than EPA Method 20. EPA Method 20 is only required for emission units where the NOx limit in 40 CFR Part 60 Subpart GG is applicable. The NSPS NOx emission limits are not applicable to the cogeneration facility since no more than one-third of the electric output is sold to an electric system.

Emission Unit 055 (Butane Barge Unloading) – This emission unit is being included in this supplemental air construction permit to classify the unit as an insignificant emission unit. The potential emission from this emission unit is less than 5 tons/year. The potential emission are 4.7 tons/year emitted from the unloading arm, based on 60 lb per barge and the maximum number of barges per year. While this unit received a previous air construction permit (AC17-85169), there are no specific emission limiting standards that are applicable in the Department's Rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.].

Emission Unit 068 (Cryogenic Ammonia Handling) – This emission unit is being included in this supplemental air construction permit to classify the unit as an insignificant emission unit. The potential emission from this emission unit is less than 5 tons/year during normal operations. A flare is only used during emergency venting to control emissions of ammonia with potential emission of 1.2 ton ammonia/year. While this unit received a previous air construction permit (AC17-127871), ammonia is not a regulated pollutant under the Department's rules. There are also no specific emission limiting standards that are applicable in the Department's rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The Department's rules regarding circumvention of pollution control equipment and proper operation (Rule 62-210.650 F.A.C.) would be applicable.

Emission Unit 077 (Dimethyl Ester Production) – This emission unit is being included in this supplemental air construction permit to replace the specific emission limitations during periods of shutdown periods of the hydrogen reformer. In the event the hydrogen reformer is shutdown the DME would discharge through an activated carbon bed. This practice will mitigate VOC emissions from the DME unit even during these upset periods of the hydrogen plant. Potential emissions are less than 5 ton/year. In addition, previous sampling from the unit demonstrated non-detectable quantities of NOx and hydrogen cyanide.

Emission Units 040 (Hexamethylene Diamine Synthesis) and 041 (B and C Hexamethylene Diamine Stripper Distillation Column)– This emission unit is being included in this supplemental air construction permit to remove the capacity limitations except for determining potential to emit and capacities during testing. While this emission unit has a maximum capacity limitation in the air construction permit of 25,000 lb/hr (0330040-040-004-AC). Since the applicable NSPS Subpart NNN requirements are not based on capacity, the capacity should be used in determining potential to emit and compliance with Subpart NNN during testing. This is consistent with the requirements of the NSPS for performance tests (40 CFR Section 60.664).

Emission Unit 076 (Maleic Anhydride Plant)– This emission unit is being included in this supplemental air construction permit to remove the capacity limitations except for determining potential to emit. The annual capacity of 260 million pounds of maleic anhydride is requested to be deleted and replaced the maximum amount of process off-gas to the boilers. The only emission from the emission unit occurs during periods of startup, shutdown and malfunction. There are also no specific emission limiting standards that are applicable in the Department's rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.].

Emission Unit 081 (Continuous Nylon Polymerization Lines) and 082 Batch Nylon Polymerization) – These emission units are being included in this supplemental air construction permit to remove the capacity limitations, which is currently expressed as a company confidential document. There are no specific emission limiting standards that are applicable in the Department's rules, other than the general visible emission standard [Rule 62-296.320(b) F.A.C.]. The emission limitation for this unit is currently expressed as a rolling annual average. It is requested that compliance with this limit be based on submission of annual emission rates with the Annual Operating Reports. With the emission limit and periodic monitoring, capacity rates are not relevant to the Department's determination of compliance.

Emission Unit 042 (Nitric Acid Plant)– This emission unit is being included in this supplemental air construction permit to remove the capacity limitations except for determining potential to emit during compliance tests. The specific maximum emission limit of 2.72 lb NOx per ton of HNO_3 is requested to be replaced with the NSPS emission limit of 3 lb per ton of HNO_3. The annual emission limit of 360 tons of NOx is generally more restrictive than either the previous limit of the NSPS.