Attachment EX-1
Title V Permit Application
Solutia, Inc., Pensacola Plant

Supplemental Requirements for All Applications

List of Proposed Exempt Activities

Area: Area I -Cyclohexane Oxidation

1 O2/CO/CO2 Analyzer Vents.
2 476 KA Refiners and Refiner Seal Tank.

Areas: Nitric Acid Plant, Nitric Acid Storage, 408 Air Compressor Building

3 MO3 Oil Storage Vent.
4 476 Lube Oil Reservoir for 467 Air and NOx Compressors.
5 408 Lube Oil Reservoirs for Air compressors CM43 and CM36
6 Vents that only vent air. such as:
1st Stage Air Compressor Vent Silencer,
2nd Stage Air Compressor Vent Silencer,
Air Compressor Vent Seal Air Vent,
NOx Compressor Vent Seal Air Vent,
Vent Silencer to vent compressed air during startup and shutdown of air compressors, Anti-surge vent releases air to prevent surging of air compressors.

Areas: Nitric Acid Reaction, Adipic Acid Refining, Adipic Acid Drying, Adipic Acid Transfer Systems, Salt Strike

7 Emission Unit 044 – Adipic Dryer.
8 Emission Unit 045 – Adipic Acid Packaging System with Baghouse
9 Emission Unit 050 - Adipic Acid Bulk Loading with Baghouse, Building 346
10 Emission Unit 051 – Adipic Acid Bulk Loading with Baghouse, Building 372
11 Emission Unit 065 – Adipic Acid Product Separator with Baghouse, Building 465
12 Emission Unit 066 – Alternate Conveyor with Baghouse, Building 465
13 Emission Unit 052 – Adipic Acid Transfer System with Baghouse
14 Emission Unit 080 – Adipic Acid 373 Dust Collector
15 Nylon Salt Strike Area.
16 Butane Railcar/Truck Unloading/Storage Spheres.
17 Adiponitrile Railcar/Truck/Barge Unloading.
18 AGS Tank at 314 Building.
19 Sulfuric Acid Railcar Unloading and Sulfuric Acid Storage Bullets.
20 Caustic Truck/Railcar Unloading and Storage Bullets.
21 Ammonia Truck/Railcar Unloading and Storage Bullets
22 314 and 442 Bldg. DME/HNO3/BHMT/AGS/HMD Loading.
23 314 Bldg. Methanol Unloading.
24 Fuel Oil #6 Barge Unloading.
25 Cyclohexane Barge Unloading.

Area: Area IV (H2 Plant, HMD Process and Storage, DME Process)

26 495 Salt Strike Area.
27 416 Building Foreshot Columns #1 and #2.
28 414 Open-top Catalyst Wash Tank.
29 Low Pressure Diamine (LPD) Process.
30 Hexamethylenediamine (HMD) Process Tank Farm.

Area: Maleic Anhydride Plant

31 A & B Compressor Lube Oil Reservoir.
32 A and "B" Train Analyzer Vents.

Area: Powerhouse Utilities and Environmental Operations
33 No. 6 Fuel Oil Storage Tanks (101TA816, 101TA813A, 101TA813B, and 101TA820).
34 Process Water System Degassifiers.
35 Neutralization Facility.
36 Natural Gas System.
37 Lube Oil Reservoirs.
38 Betz Sulfite 3 Tanks.
39 KATT Tank.
40 AGS Tank.
41 Portable Containers.
42 Cooling Towers.

Area: Yarn Plant
43 Solution Preparation Area.
44 Caprolactam Tanks and Unloading Area.
45 Sucker Gun Exhaust.
46 Spin Pack Heaters.
47 Smog Hog Fume Removal System for Nylon Drawwind.

Area: Yarn Utilities

48 513 Bldg. HMD Storage Tank (Column Bottoms).
49 513 Bldg. No. 2 Fuel Oil Storage Tanks.
50 Therminol Header and Relief Condenser.

Area: Polymer

51 508 Building Cyclone Separators.
52 508 Building Gravity Blender Gooseneck Vents.
53 Gravity Blender Breather Screens.
54 534 Building Nylon and Carbon Dryer Vents (No Shock).
55 513 Building Process Sewer Vents.

Area: Vydyne

56 509 and 538 Building Cyclone Separator.

Area: Pyrolysis Cleaning Ovens

57 Emisssion Units 001,030,031,053,054,067,012 and 069.

Area: Polymer Fines Removal System
58 Emission Unit 028 with baghouse.

Area: Miscellaneous
59 Emission Unit 047 – Nylon Vydne Resin Process.
60 Emission Unit 070 – Mixing Operation with Organic Scrubber
61 Emission Unit 071 – Aluminum Silicate Storage Silo with Baghouse
62 Emission Unit 072 – Mineral Hopper with Baghouse
63 Emission Unit 055 – Butane Barge Unloading
64 Emission Unit 068 – Cryogenic Ammonia Handling

Area: Maintenance, etc.

65 Maintenance and repair shops.
66 Plant maintenance and upkeep activities.
67 Bead Blasters located in maintenance and Repair Shops.
68 Outdoor Abrasive Blasting.
69 Belt or drum sanders having a total sanding surface of 5 ft2 or less.
70 Brazing soldering or welding equipment.
71 Other Maintenance Activities.
72 Fuel for Motor Vehicles Storage/Handling.

Area: Facility-wide

73 Fire Training-Ground.
74 Laboratory Equipment.
75 Air-conditioning units used for human comfort.
76 Ventilating units used for human comfort Non-commercial food preparation.
77 Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.
78 Janitorial services and consumer use of janitorial products.
79 Internal combustion engines used for landscaping purposes.
80 Laundry activities, except for dry-cleaning and steam boilers.
81 Bathroom/toilet vent emissions.
82 Tobacco smoking rooms and areas.
83 Blacksmith forges.
84 Plant maintenance and upkeep activities
85 Repair or maintenance shop activities
86 Portable electrical generators that can be moved by hand from one location to another.
87 Hand-held equipment for buffing, polishing;, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
88 Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities.
89 Air compressors and pneumatically operated equipment, including hand tools.
90 Batteries and battery charging stations, except at battery manufacturing plants.
91 Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.
92 Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
93 Drop hammers or hydraulic presses for forging or metalworking. Vents from continuous emissions monitors and other analyzers.
94 Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
95 Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
96 Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.
97 CO2 lasers, used only on metals and other materials which do not emit HAP in the process.
98 Consumer use of paper trimmers/binders.
99 Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in tile ovens or autoclaves or the boilers delivering the steam.
100 Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.
101 Laser trimmers using dust collection to prevent fugitive emissions.
102 Routine calibration and maintenance of laboratory equipment or other analytical instruments.
103 Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
104 Hydraulic and hydrostatic testing equipment.
105 Environmental chambers not using hazardous air pollutant (HAP) gasses. Shock chambers.
106 Humidity chambers. Solar simulators.

107 Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
108 Process water filtration systems and demineralizers. Demineralized water tanks and demineralizer vents. Boiler water treatment operations, not including cooling towers.
109 Oxygen scavenging (de-aeration) of water.
110 Ozone generators.
111 Fire suppression systems.
112 Emergency road flares.
113 Steam vents and safety relief valves (e.g. pressure relief valves, devices, etc.; also per August 24, 1994 Howard Rhodes letter to Nancy Stephens, FCIC).
114 Steam leaks.
115 Steam cleaning operations.
116 Steam sterilizers.
117 Vessels containing steam or water, such as; steam condensate vents, demineralized water tanks, water tanks.
118 Area 480 Process Analyzer vent
119 Vydyne additive room air dust control ventillation exhaust
120 Miscellaneous room air dust control ventilation exhausts less that 9000 SCFM.

Note: addition detail supporting the insignificant actiivties numbered 1-117, can be found in Attachment EX-1 in the Title V permit application. Additional detail supporting items 118-120 is included in the June 2000 Title V supplemental comments.