*** DRAFT PERMIT ***

PERMITTEE

Pall Corporation
8780 Ely Road
Pensacola, Florida 32514

Authorized Representative:
Keitha Buckingham

Air Permit No. 0330127-013-AC
Permit Expires:

Pall Membrane Technology Center
Minor Source Air Construction Permit
R & D Process Line

This is the final air construction permit, which authorizes the construction of a research and development (R & D) process line to develop filtration devices for pharmaceutical and industrial uses. The proposed work will be conducted at the Pall Membrane Technology Center, a manufacturer of micro porous membranes and fabric filters for scientific and pharmaceutical uses, which is a Standard Industrial Classification No. 3081 Unsupported Plastics Film and Sheet. The facility is located in Escambia County at 8780 Ely Road in Pensacola, Florida. The UTM coordinates are Zone 16, 480.7 km East and 3376.7 km North; Latitude: 30° 31' 20" North and Longitude: 87° 19' 19" West. As noted in the Final Determination provided with this final permit, (no changes / only minor changes and clarifications) were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). Permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Pensacola, Florida

_____ _____

Rick Bradburn (Date)
Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Keitha Buckingham, Pall Corporation: keitha_buckingham@pall.com
Al Bressler, Pall Corporation: al_bressler@pall.com
Kelly T. McCarthy, P.E.; Gulf Coast Environmental: kelly.mccarthy.ctr@mda.mil

Clerk Stamp

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)

FACILITY AND PROJECT DESCRIPTION

This facility operates under permit 0330127-009-AF, issued February 12, 2007. Permit 0330127-010-AC, issued September 16, 2008, adds Belt 5, and a polymer membrane casting line with a Regenerative Thermal Oxidizer (RTO). Permit 0330127-011-AC, issued June 12, 2009, adds a PVM/AV line (EU 017) and a Polytetrafluoroethylene (PTFE) line. Permit 0330127-012-AC, issued January 7, 2010, replaces the PFC scrubber.

Existing Facility

This facility manufactures various filtration devices for pharmaceutical and industrial uses. The operation consists of five different process lines: Fabric coating, Membrane casting, Mixing, Membrane finishing and Polymer extrusion. Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions are capped to escape classification as a major Title V facility. VOC and HAP emissions from the process areas are controlled by regenerative thermal oxidizers (RTOs). Particulate emissions from the mixing area are controlled by a baghouse. The existing facility consists of the following emissions units.

Facility ID No. 0330127

ID No.	Emission Unit Description
009	Mixing Room
010	Regenerative Thermal Oxidizer
012	HDC-V Production Line
014	Scrubber for PFC-4 Process Line and Fume
015	Thermal Oxidizer for PFC-4 Process Line liquid by-product
016	Belt 5 Regenerative Thermal Oxidizer

Proposed Project

The facility proposes to construct a small scale filtration device process line for research and development. Equipment includes two reactors, two batch tanks, a casting belt, a quench bath, a wash tray and a small dryer. An estimated 8.54 tons per year of VOC will be vented through a roof vent fan to the atmosphere. This project will construct the following emissions unit.

Facility ID No. 0330127

ID No.	Emission Unit Description
018	R & D Process Line

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northwest District Air Program, Florida Department of Environmental Protection (Department). The Northwest District's mailing address is 160 W. Government Street, Room 308, Pensacola, Florida 32503-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests and notifications shall be submitted to the Northwest District Office at the above address or via e-mail to nwdair@dep.state.fl.us.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions; and

   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the Permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require Permittee to conform to new or additional conditions. The Department shall allow Permittee a reasonable time to conform to the new or additional conditions, and on application of Permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: Permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

A. R & D Process Line

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
018	R & D Process Line

EQUIPMENT

1. Equipment: Permittee is authorized to install a research and development process line, comprised of two reactors, two batch tanks, a casting belt, a quench bath, a wash tray and a small dryer. [Permit application 0330127-013-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: At the request of Permittee, the process line is restricted to process a maximum of 900 pounds per week (Six 8-hour batches per week with each batch limited to 150 pounds) of filtration devices. [Rule 62-210.200(PTE), F.A.C., and permit application 0330127-013-AC]

3. Restricted Operation: At the request of Permittee, the hours of operation are restricted to 2,400 hours per year to limit VOC and individual HAPs emissions. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and permit application 0330127-013-AC]

EMISSIONS STANDARDS

4. Emissions Standards: Visible emissions (VE) shall not exceed 20% opacity during normal operation. [Permit application 0330127-013-AC and Rule 62-296.320, F.A.C.]

TESTING REQUIREMENTS

5. Compliance Tests: The Administrator waives the requirement for initial compliance testing for this small source of emissions. If problems develop or persist, the R & D Process Line roof vent shall be tested to demonstrate compliance with the emissions standards for VE or other pollutant(s) upon request of the Administrator. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

6. Test Requirements: Permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

7. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C., and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

8. Test Reports: Permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

9. Operational Data: Permittee shall keep and maintain records of the total annual number of membrane batches, monthly estimate of VOC emissions and the total annual hours of operation. Records shall be made available for Department inspection. [Rule 62-4.070(3), F.A.C.]