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Puritan-Bennett Corporation
Cantonment Facility
Facility ID No.: 0330089
Escambia County

Air Operation Permit
Permit No.: 0330089-001-AO

Permitting Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8597

Drafted on April 1, 1998

[electronic file name: 0330089o.doc]

Air Operation Permit
Permit No.: 0330089-001-AO

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Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

Permittee:
Puritan-Bennett Corporation

Permit No.: 0330089-001-AO
Facility ID No.: 0330089
SIC Nos.: 2834
Project: Air Operation Permit

This permit is for the operation of the Puritan-Bennett Corporation facility located at 650 Chemstrand Road in Cantonment, Escambia County; UTM Coordinates: Zone 16, 475.8 km East and 3384.6 km North; Latitude: 30° 35' 30" North and Longitude: 87° 14' 58" West.

STATEMENT OF BASIS: This 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, and 62-210. 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: April 21, 1998

Renewal Application Due Date: February 20, 2003

Expiration Date: April 21, 2002²³

*Corrective
letter
5/7/98*

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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

EKM/bkc

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a gas separation plant co-located with Solutia which utilizes a waste stream to produce nitrous oxide. A raw gas stream from Solutia is scrubbed to remove NO_x, and further treated with desorption columns (separators) and aqueous polishers. Scrubber wastewater is returned to Solutia as dilute nitric acid. Atmospheric emissions occur from two vents from the two desorption columns (emission units 001 and 002) and consist generally of N₂, N₂O, NO_x, CO₂, CO, and VOCs.

Based on the permit application received March 27, 1998, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	Vent from the first process separator
002	Vent from the second process separator

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Short Form Application 0330089-001-AO dated March 20, 1998
September 2, 1993 letter, William C. Fettes, General Manager, Puritan-Bennett enclosing:
Measurement and Calculation of Air Emissions
Facility Monitoring Plan
Leak Detection Program

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]
5. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.
[Rule 62-4.090, F.A.C.]
6. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8597

7. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364 during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

A. This section addresses the following emissions unit(s).

E.U.

ID No. Brief Description

001,002 Process vents from process separators no. 1 and 2 respectively

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The facility operation rate shall not exceed 13,500 lbs/hr Solutia stack gas inflow. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Hours of Operation. This emissions unit is allowed to 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

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.3. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>Emission Rate</u>	<u>Basis</u>
CO	10.64 lbs/hr	Permit Application Requested Limit
NOx	0.33 lbs/hr	Permit Application Requested Limit

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.4. Compliance tests for CO and NOX emissions are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the facility is capable of compliance at the permitted maximum operating rate. Tests shall be conducted at both discharge vents in accordance with standard operating procedures for Draeger tubes, and Puritan-Bennett Corporation's Procedures for Measurement and Calculation of Air emissions attached hereto. Flow rates of feed and emission gases shall be measured as a part of the emission test. A test shall be conducted once during the life of this permit during December, 2008. Results shall be submitted to the Department within 45 days after testing, and shall include both quantities and concentration of pollutants, The Department shall be notified at least 15 days prior to testing to allow witnessing.

[Rules 62-4.070, 62-297.310(7) and 62-297.401(9), F.A.C.]

*Concurrence
D. J. Scott
5/7/98*

A.5. The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.6. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Monitoring of Operations

A.7. The facility shall continuously monitor operations in accordance with Puritan-Bennett Corporation's Facility Monitoring Plan and Leak Detection Program attached hereto.
[Rule 62-4.070, F.A.C.]

A.8. An annual operation report [DEP Form 62-210.900(5)] shall be submitted by March 1 each year.
[Rule 62-210.370(3), F.A.C.]

GENERAL CONDITIONS:

Page 1 of 2

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.

GENERAL CONDITIONS:

Page 2 of 2

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.

Appendix H-1, Permit History/ID Number Changes

Puritan-Bennett Corporation
Cantonment Facility

DRAFT Permit No.: 0330089-001-AO
Facility ID No.: 0330089

Permit History (for tracking purposes):

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>
01	Gas separation plant	AO17-154266	10/07/88	10/01/93
01	Process vent (1st separator)	AO17-234014	7/21/93	6/30/98
02	Process vent (2nd separator)		modified 8/24/92	(001)
002	Process vent (1st separator)	0330089-001-AO	pending	
	Process vent (2nd separator)			

Table 1-1, Summary of Air Pollutant Standards and Terms

Puritan-Bennett Corporation
Cantonment Facility

DRAFT Permit No.: 0330089-001-AO
Facility ID No.: 0330089

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description
001, 002 Process vents from process separators no. 1 and 2 respectively

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions		Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs/hour	lbs./hour	TPY		
CO	offgas	8760		10.64	46.6		Permit application limit Permit application limit	A.3. A.3.
NOx	offgas	8760		0.33	1.44			
VOC	offgas	8760						

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

Table 2-1, Summary of Compliance Requirements

Puritan-Bennett Corporation
Cantonment Facility

DRAFT Permit No.: 0330089-001-AO
Facility ID No.: 0330089

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description
001, 002 Process vents from process separators no. 1 and 2 respectively

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	
						CMS**	See permit condition(s)
CO NOx	offgas offgas	Draeger tube Draeger tube		once/permit once/permit			1. Test Methods 1. Test Methods

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

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