FILE COPY

Cerex Advanced Fabrics, Inc.
Pensacola Facility
Facility ID No.: 0330108
Escambia County

Air Operation Permit
Permit No.: 0330108-001-AO

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

[electronic file name: 0330108-001-ao.doc]

Air Operation Permit
Permit No.: 0330108-001-AO

Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information A. Facility Description. B. Summary of Emissions Unit ID No(s). and Brief Description(s). C. Relevant Documents.	2
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions A. 001, Spunbonded Fabric Manufacturing	5

Appendices:
Appendix G-1, General Conditions

Department of Environmental Protection

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Cerex Advanced Fabrics, Inc.

Permit No.: 0330108-001-AO
Facility ID No.: 0330108
SIC Nos.: 22
Project: Air Operation Permit

This permit is for the operation of the Pensacola Facility located at 610 Chemstrand Road in Pensacola, Escambia County; UTM Coordinates: Zone 16, 476.7 km East and 3384.5 km North; Latitude: 30° 35' 28" North and Longitude: 87° 14' 25" 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, 2000
Renewal Application Due Date: February 21, 2005
Expiration Date: April 21, 2005

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

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

EKM/rvk

Section I. Facility Information.

Subsection A. Facility Description.

This facility is a spunbonded fabric manufacturing process. The facility has three lines (A, B, and C). Lines A and B form fiber bats that are acid treated with anhydrous HCl, washed with low temperature water, and steam dried. The drying steam is purchased from Solutia. Emissions resulting from the acid treatment are treated with scrubbers and demisters, and from the drying, with a scrubber.

The line C fiber bats are not acid treated, but are pressure treated with rollers heated with a 1.64 MMBtu/hr NG fired heater. This heater is exempt from permitting in accordance with Rule 62-210.300(3)(b)1, F.A.C., Generic Emissions Unit Exemption.

Based on the permit application received March 1, 2000, 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. ID No.	Brief Description
001	Spunbonded Fabric Manufacturing

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 on file with permitting authority:
Permit Application received March 1, 2000
Additional Information Request dated March 16, 2000
Additional Information Response received April 17, 2000

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. Prevention of Accidental Releases (Section 112(r) of CAA).
a. As required by rule, inspection, or change in process the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
c. The owner or operator shall submit the required annual registration fee to the DCA on or before June 21, 1999 and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.

5. An annual operating report for air pollutant emitting facility, DEP Form 62-210.900(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office.
[Rule 62-210.370, F.A.C.]

6. 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 62-210.300, F.A.C.]

7. 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.]

8. 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, press 7; Fax: 850/595-8096

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, 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, then press 7, during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Spunbonded Fabric Manufacturing

This facility is a spunbonded fabric manufacturing process.

Nylon filaments are laid down to form three fiber bats (lines A, B, and C). The cooling air from this process is discharged without controls from vents 1, 2, and 3, respectively.

Lines A and B fiber bats are treated with anhydrous HCl, and acid exhaust air is controlled by three scrubbers (two in service with one backup) and demisters. Scrubbed emissions from the acid treatment are discharged from vents 4 and 5.

The acid treated fabric from lines A and B is washed with low temperature water, with untreated ventilation exhaust air discharged from vents 6 and 7.

The washed, acid treated fabric from lines A and B is then dried with parallel steam dryers using steam purchased from Solutia, Inc. Emissions are controlled with a scrubber, and discharged from vent 9.

Line C fiber bats are processed without acid treatment through a closed loop natural gas fired heated pressure roller bonding process. The closed loop heater has a maximum heat input of 1.64 MMBtu/hr, and is exempt from permitting pursuant to Rule 62-210.300(3)(b)1, F.A.C., Generic Emissions Unit Exemption.

Permit AO17-2123 issued August 21, 1975, was the initial permit for this facility. Permit AO17-27040 was issued May 26, 1995 with an expiration date of May 1, 2000, includes operating conditions, specific emission limitations, and requires emission monitoring. This operating permit limited emissions of HCl to 34 pounds per day (6.2 tons per year). This facility is not currently subject to any other identified source-specific criteria or requirements.

Based on the permit application received March 1, 2000, this facility is not a major source of hazardous air pollutants (HAPs).

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

Operation Parameters

A.1. 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

A.2. HCl. Emissions.

a. Hydrochloric acid (HCl) emissions shall not exceed five parts per million (ppm) from any individual stack during normal operations. This 5 ppm requirement is waived for no more than 480 hours per year or 20 days per year for stacks 6 and 7 to allow special runs of GSAO, a specialty product. However, the volume-flow weighted average for all stacks, 4 through 7 and 9, shall not exceed 5 ppm during these special product runs. Records of GSAO run times shall be maintained in accordance with the attached general conditions, and shall be made available for Department inspection.
[Rule 62-4.070(3), F.A.C., application received March 1, 2000].

b. Total HCl emissions from stacks 4 through 7 and 9 shall not exceed a total of 34 pounds per day or a daily average of 1.4 pounds per hour.
[Rule 62-4.070(3), F.A.C., application received March 1, 2000].

Test Methods and Procedures

A.3. HCl Emissions Testing.

a. HCl emissions tests are required to show continuous compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the maximum operating rate. Tests shall be conducted in accordance with the sampling technique described in subparagraph **A.3.b.** Other test methods and alternate compliance procedures may be used only after prior approval has been obtained in writing from the Department. Such tests shall be conducted quarterly. Quarter to quarter tests shall be conducted at a minimum of 30 days apart. Result shall be submitted to the Department within 45 days after testing, and shall include but not be limited to sampling date, source, Draeger tube concentrations, flow rates, on stream time, and calculations for total HCl emissions.
[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

b. HCl concentration shall be determined by use of a Draeger tube operated in accordance with the manufacturer's instructions. Air flow shall be measured by a Magnehelic gauge in 2" increments across each involved duct and averaged. Actual emissions shall be calculated from PPM HCl, flow rate, and on-stream time as follows:

lbs/hr = (**X** ppm HCl)x(**Y** ~~ft/min~~ ft³/min)x(60 min/hr)x(~~met~~ m³/35.32 ft)x(**Z** kg/~~met~~ kg/m³)X(2.2 lbs/kg)

X = HCl concentration, ppm
Y = flow rate, ~~ft/min~~ ft³/min
Z = = density of gas stream, kg/met

[Rule 62-4.070(3), F.A.C., Operation permit AO17-270040, January 23, 1989 letter]

c. 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).
[Rule 62-297.310(7), F.A.C.]

d. 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.]

A.4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.620(1), F.A.C.]

Monitoring of Operations

A.5. Scrubber water flows: The gashouse scrubbers, post gas house scrubbers, and dryer scrubber shall be operated with a minimum water flow of 15 gallons per minute each. The scrubber water flow shall be recorded once per shift within two hours from the start of each shift. The records shall be maintained with the attached general conditions, and shall be made available for Department inspection.
[Rule 62-4.070(3), F.A.C.]

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.