

Facility DEC ID: 8343800010

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-3438-00010/02001
Mod 0 Effective Date: 04/18/2019 Expiration Date: 04/17/2029
Mod 1 Effective Date: 01/27/2021 Expiration Date: 04/17/2029
Mod 2 Effective Date: 01/12/2023 Expiration Date: 04/17/2029

Permit Issued To: MIZKAN AMERICA INC
1661 FEEHANVILLE DR STE 300
MOUNT PROSPECT, IL 60056

Contact: DAVID J CLAUSON
MIZKAN AMERICA INC
1661 FREEHANVILLE DR #300
MOUNT PROSPECT, IL 60056
(847) 590-0059

Facility: MIZKAN AMERICA INC LYNDONVILLE PLANT
247 WEST AVE
LYNDONVILLE, NY 14098-0534

Description:
Air State Facility Permit to Mizkan America Inc. facility in Lyndonville, NY which manufactures white distilled vinegar, mustard, and specialty vinegars.

The permit includes a facility wide cap of 50 tons per year of Volatile Organic Chemicals (VOC) which consist mainly of ethanol and acetic acid through the installation of two feedstock recovery units (FRUs) on four acetators. The facility also is required to apply Best Available Control Technology (BACT) and Toxic-Best Available Control Technology (T-BACT) due to acetaldehyde (a Hazardous Air Pollutant (HAP)) emissions. The FRUs and wet scrubbers control the acetaldehyde emissions and meet both of the above criteria. The facility also houses a diesel emergency engine, a natural gas emergency reciprocating engine, and three NG boilers.

January 20, 2021 minor mod to add tanks and to establish monitoring parameters for pressure drop, flow rate for water through feedstock recovery units, emission factors, destruction and removal efficiency based on results of source testing.

Facility DEC ID: 8343800010

October 10, 2022 minor mod to require reporting changes from annual anniversary to annual calendar, and condition changes to increase monitoring based on advanced notification.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: KIMBERLY A MERCHANT
 6274 E AVON LIMA RD
 AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ /

Facility DEC ID: 8343800010

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

Facility DEC ID: 834380010

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 6 5 Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

Facility DEC ID: 8343800010

DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
 The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
 The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
 A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
 Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
 The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
 The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
 Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department

Facility DEC ID: 8343800010

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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MOUNT PROSPECT, IL 60056

Facility: MIZKAN AMERICA INC LYNDONVILLE PLANT
247 WEST AVE
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Authorized Activity By Standard Industrial Classification Code:
2099 - FOOD PREPARATIONS NEC

Mod 0 Permit Effective Date: 04/18/2019

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Mod 1 Permit Effective Date: 01/27/2021

Permit Expiration Date: 04/17/2029

Mod 2 Permit Effective Date: 01/12/2023

Permit Expiration Date: 04/17/2029

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 7 1 6 NYCRR 215.2: Open Fires - Prohibitions
- 8 2 6 NYCRR 202-1.1: Required Emissions Tests
- 8 *4 6 NYCRR 201-7.1: Capping Monitoring Condition
- 10 1-1 6 NYCRR 202-1.1: Compliance Demonstration
- 10 5 6 NYCRR 202-1.2: Notification
- 11 6 6 NYCRR 211.2: Visible Emissions Limited
- 11 2-1 6 NYCRR 212-2.3 (a): Compliance Demonstration
- 11 2-2 6 NYCRR 212-2.3 (a): Compliance Demonstration
- 12 1-2 6 NYCRR 212-2.3 (a): Compliance Demonstration
- 13 2-3 6 NYCRR 212-2.3 (a): Compliance Demonstration
- 14 7 6 NYCRR 225-1.2 (g): Compliance Demonstration
- 15 8 40CFR 60, NSPS Subpart III: Applicability
- 15 9 40CFR 60, NSPS Subpart III: Compliance and Enforcement
- 15 10 40CFR 63, Subpart ZZZZ: Applicability
- 15 11 40CFR 63, Subpart ZZZZ: Compliance and Enforcement

Emission Unit Level

EU=E-00001,Proc=003

- 16 12 6 NYCRR 212-1.3: Compliance Demonstration
- 17 13 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 17 15 6 NYCRR 212-2.3 (a): Compliance Demonstration
- 18 28 6 NYCRR 212-2.3 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 21 18 ECL 19-0301: Contaminant List
- 21 19 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 22 2-4 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 23 20 6 NYCRR Subpart 201-5: Emission Unit Definition
- 24 21 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 24 1-5 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 25 22 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 25 23 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 25 24 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 27 25 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=E-00001,Proc=003

- 31 26 6 NYCRR 212-2.1 (a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

FEDERALLY ENFORCEABLE CONDITIONS

Mod 2/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS**The following conditions are federally enforceable.**

Condition 1: Open Fires - Prohibitions
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement: 6 NYCRR 215.2**Item 1.1:**

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 1.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 2: Required Emissions Tests**Effective between the dates of 04/18/2019 and 04/17/2029****Applicable Federal Requirement:6 NYCRR 202-1.1****Item 2.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 4: Capping Monitoring Condition**Effective between the dates of 04/18/2019 and 04/17/2029****Applicable Federal Requirement:6 NYCRR 201-7.1****Item 4.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1

Item 4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 4.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2020.
 Subsequent reports are due every 12 calendar month(s).

Condition 1-1: Compliance Demonstration
Effective between the dates of 01/27/2021 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 1-1.1:
 The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 000075-07-0 ACETALDEHYDE
 CAS No: 0NY998-00-0 VOC

Item 1-1.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

The Facility's two feedstock recovery units (FRUs)/wet scrubbers on the four vinegar acetators, have an expected VOC recovery rate of 99.98% and an expected acetaldehyde recovery rate of 53.8%. The scrubber emission rate must be tested periodically to ensure that the facility is still meeting necessary control efficiencies to demonstrate compliance with the state facility permit requirements. Stack testing will take place once every 10 years.

Stack testing documentation and records must be kept and made available upon request until new testing documentation becomes available.

Monitoring Frequency: ONCE EVERY TEN YEARS
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Notification
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 202-1.2

Item 5.1:
 A person who is required by the commissioner to submit a stack test report shall notify the commissioner, in writing, not less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to stack test including sampling and analytical procedures. Such person shall allow the commissioner, or his representative, free access to observe stack testing being conducted by such person.

Condition 6: Visible Emissions Limited

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 211.2

Item 6.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 2-1: Compliance Demonstration

Effective between the dates of 01/12/2023 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 2-1.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: E-00001
Process: 003

Regulated Contaminant(s):
CAS No: 000075-07-0 ACETALDEHYDE
CAS No: 0NY998-00-0 VOC

Item 2-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

During times when the plant is not making mash, the recovered feedstock will be recirculated through the scrubbers as scrubber media for a maximum of 50 hours. After 50 hours fresh water will be reintroduced to the system and the plant will either make mash or dispose of excess recovered feedstock. Recovered feedstock is not utilized for another pass through the scrubbers system.

Parameter Monitored: HOURS OF OPERATION

Upper Permit Limit: 50 hours

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

Subsequent reports are due every 12 calendar month(s).

Condition 2-2: Compliance Demonstration

Effective between the dates of 01/12/2023 and 04/17/2029

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 2-2.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: E-00001
Process: 003

Regulated Contaminant(s):
CAS No: 000075-07-0 ACETALDEHYDE
CAS No: 0NY998-00-0 VOC

Item 2-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Mizkan LYN will record daily acid and alcohol levels in the scrubbers, recovered feedstock levels in Tanks 100/101. The amount of makeup city water added to the tanks will be recorded daily.

Monitoring Frequency: DAILY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 1-2: Compliance Demonstration
Effective between the dates of 01/27/2021 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: E-00001
Process: 003

Regulated Contaminant(s):
CAS No: 000075-07-0 ACETALDEHYDE
CAS No: 0NY998-00-0 VOC

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Water flow rate will be set with a manual valve and

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

monitored with an integral digital display. Flow rate is to be monitored and recorded once per day in the facility log book. The system will be equipped with a low-level alarm that will be triggered if the flow falls below the lower permit limit flow rate for more than 10 seconds. Any instances of daily observations outside of the permitted range or the alarm sounding must be investigated. The cause of the deviation and any corrective actions taken must be recorded.

Records shall be maintained at the facility for a period of at least 5 years and must be made available to the Department upon request. Deviations from the permitted range lasting more than 10 seconds must be reported to the department in writing on an annual basis. Deviation reports must include estimated time of deviation, determined cause, and corrective actions taken.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 5 gallons per minute

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 12 calendar month(s).

Condition 2-3: Compliance Demonstration**Effective between the dates of 01/12/2023 and 04/17/2029****Applicable Federal Requirement: 6 NYCRR 212-2.3 (a)****Item 2-3.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-00001

Process: 003

Regulated Contaminant(s):

CAS No: 000075-07-0 ACETALDEHYDE

CAS No: 0NY998-00-0 VOC

Item 2-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Pressure drop is to be monitored and recorded once per day in the facility log book. Any instances of daily

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

observations outside of the permitted range must be investigated. The cause of the deviation and any corrective actions taken must be recorded.

Records shall be maintained at the facility for a period of at least 5 years and must be made available to the Department upon request. Deviations from the permitted range must be reported to the department in writing on an annual basis. Deviation reports must include estimated time of deviation, determined cause, and corrective actions taken.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 0 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

Subsequent reports are due every 12 calendar month(s).

Condition 7: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 225-1.2 (g)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installation that fires distillate oil other than number two heating oil are limited to the purchase of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
 Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.0015 percent by weight
 Monitoring Frequency: PER DELIVERY
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
 TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Applicability
 Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII

Item 8.1:

Facilities that have stationary compression ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart IIII.

Condition 9: Compliance and Enforcement
 Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII

Item 9.1:

The Department has not accepted delegation of 40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 60 Subpart IIII during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 10: Applicability
 Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 10.1:

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

Condition 11: Compliance and Enforcement
 Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Item 11.1:

The Department has not accepted delegation of 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart ZZZZ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

****** Emission Unit Level ******

Condition 12: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 212-1.3**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001
Process: 003

Regulated Contaminant(s):
CAS No: 000075-07-0 ACETALDEHYDE

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the applicability requirements of Section 212-1.1 of this Part, the department will assign an environmental rating for each air contaminant emitted from each process emission source or emission point in accordance with Subdivisions (a) through (e) of this Section. The factors in Subdivisions (a) through (d) will be considered in making a determination of the environmental rating to be applied to an air contaminant pursuant to subdivision (e), Table 1 – Environmental Rating Criteria.

Acetaldehyde is assigned an Environmental Rating of A.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Condition 13: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001

Process: 003

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001

Process: 003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

At least one of the two feedstock recovery units (FRUs)/wet scrubber units shall operate at all time an acetator is operating; and both units shall operate any time more than two acetators are operating with an allowance of 48 hours per year for downtime per FRU/wet scrubber for maintenance.

The facility shall record date of cycle start, time of cycle start, hours per cycle of operation on the day of discharge, tabulated monthly for each acetator and an exception log for each FRU/wet scrubber of daily hours when not running, tabulated monthly.

Records shall be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 28: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001
 Process: 003

Regulated Contaminant(s):
 CAS No: 000075-07-0 ACETALDEHYDE

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

At least one of the two feedstock recovery units (FRUs)/wet scrubber units shall operate at all time an acetator is operating; and both units shall operate any time more than two acetators are operating with an allowance of 48 hours per year for downtime per FRU/wet scrubber for maintenance.

The facility shall record date of cycle start, time of cycle start, hours per cycle of operation on the day of discharge, tabulated monthly for each acetator and an exception log for each FRU/wet scrubber of daily hours when not running, tabulated monthly.

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Records shall be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) the equipment at the facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 18: Contaminant List

Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:ECL 19-0301

Item 18.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000075-07-0
Name: ACETALDEHYDE

CAS No: 0NY998-00-0
Name: VOC

Condition 19: Malfunctions and start-up/shutdown activities

Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR 201-1.4

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Item 19.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 2-4: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 01/12/2023 and 04/17/2029****Applicable State Requirement: 6 NYCRR 201-1.4****Item 2-4.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 20: Emission Unit Definition
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 20.1(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: E-00001

Emission Unit Description:

White Distilled Vinegar (WDV) Production. Ethanol, water and yeast are steam heated to create a mash fermentation, which is fed to four vinegar acetators for batch manufacturing of WDV. All emission sources in this EU are either storage or process tanks. Once fermentation is complete, intermediate product is transferred to short-term discharge tank and then filtered and transferred to storage, cutting or blending tanks. Bulk WDV is also received and transferred to storage. The tanks are used to achieve the desired percent of acetic acid prior to packaging or bulk shipment. Finished product acetic acid concentrations range from 5% to 15%.
Cider Vinegar (CV) Production. Bulk 90 grain cider vinegar

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

(CV) is received from other Mizkan facilities into bulk storage tanks and from there to a feed tank for filtering. The filtered CV is blended with water to reach 5% acetic acid, pasteurized and then fed into a bottling tank and/or drums/totes.

The facility intends to begin bottling of organic vinegar using existing equipment. This process will include bulk 90 grain organic CV received into an existing tank, blend with water to approximately 50 grain vinegar, and then package into bottles.

Recovered feedstock from the FRUs/wet scrubbers is stored in tanks 100, 101 for use as feedstock to Mash tank 78 in subsequent batches.

Building(s): PRODBLDG

Item 20.2(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: E-00006

Emission Unit Description:

Packaging. Finished vinegar products are either bottled, including two ink jet printers for labeling of individual bottles and packing boxes, or bulk packaged into drums/totes or tankers.

Process 18 through 20

Building(s): PRODBLDG

Condition 21: Renewal deadlines for state facility permits
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 21.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 1-5: CLCPA Applicability
Effective between the dates of 01/27/2021 and 04/17/2029

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 1-5.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Condition 22: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 22.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 22.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 8
6274 East Avon-Lima Rd.
Avon, NY 14414

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2020.
Subsequent reports are due every 12 calendar month(s).

Condition 23: Air pollution prohibited
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR 211.1

Item 23.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**** Emission Unit Level ****

Condition 24: Emission Point Definition By Emission Unit
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Item 24.1(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: E-00001

Emission Point: GEN01

Height (ft.): 23 Diameter (in.): 4
 NYTMN (km.): 4802.646 NYTME (km.): 224.395 Building: PRODBLDG

Emission Point: SC008

Height (ft.): 26 Diameter (in.): 1
 NYTMN (km.): 4802.577 NYTME (km.): 224.41

Emission Point: SC009

Height (ft.): 38 Diameter (in.): 1
 NYTMN (km.): 4802.606 NYTME (km.): 224.417

Emission Point: SC010

Height (ft.): 38 Diameter (in.): 1
 NYTMN (km.): 4802.632 NYTME (km.): 224.418

Emission Point: SC011

Height (ft.): 38 Diameter (in.): 1
 NYTMN (km.): 4802.596 NYTME (km.): 224.416

Emission Point: SC012

Height (ft.): 38 Diameter (in.): 1
 NYTMN (km.): 4802.592 NYTME (km.): 224.417

Emission Point: SC013

Height (ft.): 38 Diameter (in.): 1
 NYTMN (km.): 4802.588 NYTME (km.): 224.416

Emission Point: SC014

Height (ft.): 38 Diameter (in.): 1
 NYTMN (km.): 4802.583 NYTME (km.): 224.416

Emission Point: SC055

Height (ft.): 15 Diameter (in.): 1
 NYTMN (km.): 4802.589 NYTME (km.): 224.381

Emission Point: SC056

Height (ft.): 15 Diameter (in.): 1
 NYTMN (km.): 4802.588 NYTME (km.): 224.387

Emission Point: SC100

Height (ft.): 26 Diameter (in.): 15
 NYTMN (km.): 4802.63 NYTME (km.): 224.413

Emission Point: SC101

Height (ft.): 26 Diameter (in.): 15
 NYTMN (km.): 4802.63 NYTME (km.): 224.413

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Emission Point: ST001
 Height (ft.): 31 Diameter (in.): 10
 NYTMN (km.): 4802.624 NYTME (km.): 224.391 Building: PRODBLDG

Emission Point: ST002
 Height (ft.): 31 Diameter (in.): 10
 NYTMN (km.): 4802.638 NYTME (km.): 224.39 Building: PRODBLDG

Emission Point: SW015
 Height (ft.): 35 Diameter (in.): 1
 NYTMN (km.): 4802.583 NYTME (km.): 224.359

Emission Point: SW016
 Height (ft.): 35 Diameter (in.): 1
 NYTMN (km.): 4802.583 NYTME (km.): 224.348

Emission Point: SW017
 Height (ft.): 35 Diameter (in.): 1
 NYTMN (km.): 4802.584 NYTME (km.): 224.336

Item 24.2(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: E-00006

Emission Point: PAC01
 Height (ft.): 23 Diameter (in.): 1
 NYTMN (km.): 4802.639 NYTME (km.): 224.442

**Condition 25: Process Definition By Emission Unit
 Effective between the dates of 04/18/2019 and 04/17/2029**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00001
 Process: 003 Source Classification Code: 3-02-042-01
 Process Description:

Acetators & Foam Tanks - Up to four vinegar acetators are initially charged to approximately 80% of working capacity with a mash (5% alcohol solution). Each acetator has a bottom impeller for agitation and, in some cases, a ring compressor blower for aeration, to maintain a high count of bacterial culture in the acetator. After the initial charge of feedstock, 95% ethanol is fed to the acetators at a rate sufficient to maintain a 1.25% ethyl alcohol concentration for the majority of the injection cycle time (20-40 hours) where ethanol is converted to vinegar. Liquid foam from the acetators is piped to two defoamer (k.o.) tanks (both exempt), and exhaust air is piped to a header feeding two feedstock recovery units (FRUs).

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Emission Unit: E-00001

Process: 004

Source Classification Code: 4-07-008-98

Process Description:

WDV Discharge - Once the vinegar achieves the desired acetic acid concentration, the product and any liquid in the defoamer tanks is transferred to a discharge tank and/or surge tank, then to a feed tank (exempt), through a Romicon filter and into one of two storage tanks (both exempt).

Emission Source/Control: CV001 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T0009 - Process

Emission Source/Control: T0042 - Process

Item 25.5(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00001

Process: 005

Source Classification Code: 4-07-008-98

Process Description:

WDV Bulk Storage - Filtered vinegar and bulk WDV is stored in five bulk tanks and then blended with water to achieve the final acetic acid concentration.

Emission Source/Control: CV001 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T0010 - Process

Emission Source/Control: T0011 - Process

Emission Source/Control: T0016 - Process

Emission Source/Control: T0017 - Process

Emission Source/Control: T0041 - Process

Item 25.6(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00001

Process: 006

Source Classification Code: 4-07-008-98

Process Description:

WDV Cutting & Storage - finished vinegar products are stored in four bulk tanks for use as a raw material in other products and one feed tank for packaging.

Emission Source/Control: T0043 - Process

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Emission Source/Control: T0045 - Process

Emission Source/Control: T0046 - Process

Emission Source/Control: T0047 - Process

Item 25.7(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00001

Process: 007

Source Classification Code: 4-07-008-98

Process Description:

CV Receiving & Storage - Bulk 90 grain cider vinegar (CV) is received from other Mizkan facilities into five bulk storage tanks and from there to a feed tank for filtering.

Emission Source/Control: CV001 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T0008 - Process

Emission Source/Control: T0012 - Process

Emission Source/Control: T0013 - Process

Emission Source/Control: T0014 - Process

Emission Source/Control: T0015 - Process

Emission Source/Control: T0040 - Process

Item 25.8(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00001

Process: 008

Source Classification Code: 4-07-008-98

Process Description:

CV Cutting & Storage - The filtered CV is blended with water to reach 5% acetic acid, pasteurized and then fed into a bottling tank (exempt) and/or packaged into drums/totes.

Emission Source/Control: T0044 - Process

Item 25.9(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00006

Process: 018

Source Classification Code: 3-02-999-98

Process Description:

Bottling - final WDV and seasoned vinegar products are packaged into bottles.

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

Emission Source/Control: BTL01 - Process

Item 25.10(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00006
 Process: 019 Source Classification Code: 3-02-999-98
 Process Description:
 Bulk Packaging - packaging of all products into drums/totes or tankers.

Emission Source/Control: PKG01 - Process

Item 25.11(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-00006
 Process: 020 Source Classification Code: 4-90-999-98
 Process Description:
 Ink Jet Printing - The facility has two ink jet printers that are utilized the entire time the respective bottling lines run. These printers label both individual bottles and packing boxes.

Emission Source/Control: PRT01 - Process

Condition 26: Compliance Demonstration
Effective between the dates of 04/18/2019 and 04/17/2029

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001
 Process: 003
 Regulated Contaminant(s):
 CAS No: 000075-07-0 ACETALDEHYDE

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
 This facility emits acetaldehyde, which is listed as a High Toxicity Air Contaminant in Table 2 of 6 NYCRR Part 212-2.2. Those emissions have been assigned an environmental rating of A by the Department. In order to demonstrate compliance with the requirements of Part 212, the facility has agreed to limit emissions of acetaldehyde

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010

to less than 950 pounds per year based on the operation of two feedstock recovery units (FRUs)/wet scrubber units.

The facility owner or operator shall operate the FRUs at all times vinegar is being produced, and shall maintain them in a satisfactory state of repair as recommended by the manufacturer. At least one of the two FRUs shall be operated at all times an acetator is operating; and both units shall be operated any time more than two acetators are operating with an allowance of 48 hours per year for downtime per FRU/wet scrubber for maintenance.

Additionally, the facility owner or operator shall maintain records indicating the 12-month total acetaldehyde emissions from all emission sources at the facility. Such records shall include all necessary data and calculations for demonstrating compliance with this condition. Records shall be maintained on site for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: ACETALDEHYDE

Upper Permit Limit: 950 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 8-3438-00010/02001

Facility DEC ID: 8343800010