



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 8-5438-00001/00003  
Effective Date: 12/04/2008                      Expiration Date: No expiration date

Permit Issued To: FLEISCHMANN'S VINEGAR COMPANY INC  
12604 HIDDEN CREEK WAY STE A  
CERRITOS, CA 90703

Contact: FLEISCHMANN'S VINEGAR COMPANY INC  
12604 HIDDEN CREEK WAY STE A  
CERRITOS, CA 90703  
(562) 404-4564

Facility: FLEISCHMANN'S VINEGAR PLANT  
4754 ST RTE 414  
NORTH ROSE, NY 14516

**Description:**

Initial Air State Facility Permit for an existing facility. The facility previously operated under an exemption for food production. It operates ten (10) fermentation acetators which convert an alcohol base stock into vinegar. Each of the fermentation vessels are mechanically aerated to facilitate the bacterial conversion from alcohol to vinegar. Prior to discharging to the atmosphere, the air from the aeration process is routed through wet scrubbers for VOC removal. The facility has nine (9) emission points including uncontrolled emissions of VOC from storage tanks containing product and stock. Potential emissions are below the thresholds which defines a major source in 6 NYCRR 201-2.1(b)(21). Contaminants emitted include VOC and one HAP.

The facility also operates five (5) emergency reciprocating internal combustion engines used to generate electricity during power outages which are exempt under 6 NYCRR 201-3.2(c)(6) and 3 natural gas boilers less than 10 MMBtu exempt under 6 NYCRR 201-3.2(c)(1).

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: DAVID L BIMBER  
DIVISION OF ENVIRONMENTAL PERMITS  
6274 EAST AVON LIMA RD  
AVON, NY 14414-9519

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



### 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.



## LIST OF CONDITIONS

### DEC GENERAL CONDITIONS

#### General Provisions

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

#### Facility Level

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



**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: 6NYCRR 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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for 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**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 4.1:**

The Department reserves the right 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: 6NYCRR 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  
(716) 226-2466



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY  
PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: FLEISCHMANN'S VINEGAR COMPANY INC  
12604 HIDDEN CREEK WAY STE A  
CERRITOS, CA 90703

Facility: FLEISCHMANN'S VINEGAR PLANT  
4754 ST RTE 414  
NORTH ROSE, NY 14516

Authorized Activity By Standard Industrial Classification Code:  
2099 - FOOD PREPARATIONS NEC

Permit Effective Date: 12/04/2008  
date.

Permit Expiration Date: No expiration  
date.



## LIST OF CONDITIONS

### DEC GENERAL CONDITIONS

#### General Provisions

Facility Inspection by the Department  
Relationship of this Permit to Other Department Orders and Determinations  
Applications for permit renewals, modifications and transfers  
Permit modifications, suspensions or revocations by the Department

#### Facility Level

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

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 ECL 19-0301: Contaminant List
- 2 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 3 6NYCRR 201-5: Emission Unit Definition
- 4 6NYCRR 201-5.4(b): Compliance Demonstration
- 5 6NYCRR 211.2: Air pollution prohibited
- 6 6NYCRR 212.3(a): Emissions from existing sources

#### Emission Unit Level

- 7 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 8 6NYCRR 201-5: Process Definition By Emission Unit

#### EU=E-U0001,EP=AC7-8,Proc=P01,ES=000A7

- 9 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=AC7-8,Proc=P01,ES=000A8

- 10 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=AC7-8,Proc=P01,ES=00A78

- 11 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=ACE10,Proc=P01,ES=00A10

- 12 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=ACEA1,Proc=P01,ES=000A1

- 13 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=ACEA2,Proc=P01,ES=000A2

- 14 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=ACEA3,Proc=P01,ES=000A3

- 15 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=ACEA4,Proc=P01,ES=000A4

- 16 6NYCRR 212.4(a): Compliance Demonstration

#### EU=E-U0001,EP=ACEA5,Proc=P01,ES=000A5

- 17 6NYCRR 212.4(a): Compliance Demonstration



**EU=E-U0001,EP=ACEA6,Proc=P01,ES=000A6**

18 6NYCRR 212.4(a): Compliance Demonstration

**EU=E-U0001,EP=ACEA9,Proc=P01,ES=000A9**

19 6NYCRR 212.4(a): Compliance Demonstration

**EU=E-U0002**

20 6NYCRR 201-5: Compliance Demonstration





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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**Item B: 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 1: Contaminant List**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 1.1:**

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

CAS No: 0NY998-00-0

Name: VOC

**Condition 2: Unavoidable noncompliance and violations**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-1.4**

**Item 2.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports



described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 3: Emission Unit Definition**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5**

**Item 3.1:**

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

Emission Unit: E-U0001

Emission Unit Description:

This unit consists of ten acetator fermentation tanks that use the oxygen in ambient air to convert alcohol to vinegar. Air is drawn into the acetator by an aerator and excess air passes through the scrubber before being emitted to atmosphere. Each acetator has an individual scrubber.

Building(s): 1  
2  
3

**Item 3.2:**

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

Emission Unit: E-U0002

Emission Unit Description:

This unit consists of approximately 150 raw storage and product tanks.

**Condition 4: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5.4(b)**

**Item 4.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 4.2:**



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational flexibility

(1) Certain changes and modifications which meet the criteria under subparagraphs (i)-(iii) of this paragraph may be conducted without prior approval of the department and shall not require modification of the permit. The facility owner and/or operator must however maintain records of the date and description of such changes and make such records available for review by department representatives upon request.

(i) Changes that do not cause emissions to exceed any emission limitation contained in regulations or applicable requirements.

(ii) Changes which do not cause the source to become subject to any additional regulations or requirements.

(iii) Changes that do not seek to establish or modify a federally-enforceable emission cap or limit.

(2) In addition to the recordkeeping required under paragraph (1), the permittee must notify the department in writing at least 30 calendar days in advance of making changes involving:

(i) the relocation of emission points within a facility;

(ii) the emission of any air pollutant not previously authorized or remitted in accordance with a permit issued by the department;

(iii) the installation or alteration of any air cleaning installations, device or control equipment.

(3) The department may require a permit modification to impose applicable requirements or special permit conditions if it determines that changes proposed pursuant to notification under paragraph (2) do not meet the criteria under paragraph (1) or the change may have a significant air quality impact. In such cases the department may require that the permittee not undertake the proposed change until it completes a more detailed review of the change for air quality impacts and/or applicable requirements. The department shall respond to the permittee in writing with such a determination within 15 days of receipt of the 30 day advance notification from the permittee. The department's determination shall



include a listing of information necessary to further review the proposed change.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 5: Air pollution prohibited**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 211.2**

**Item 5.1:**

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.

**Condition 6: Emissions from existing sources**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.3(a)**

**Item 6.1:**

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

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

**Condition 7: Emission Point Definition By Emission Unit**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5**

**Item 7.1:**

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

Emission Unit: E-U0001

Emission Point: AC7-8

Height (ft.): 40

Diameter (in.): 6

Building: 2

Emission Point: ACE10

Height (ft.): 44

Diameter (in.): 14

Building: 1

Emission Point: ACEA1

Height (ft.): 42

Diameter (in.): 6



Emission Point: ACEA2			Building: 1
Height (ft.): 44	Diameter (in.): 6		
Emission Point: ACEA3			Building: 1
Height (ft.): 45	Diameter (in.): 6		
Emission Point: ACEA4			Building: 1
Height (ft.): 38	Diameter (in.): 6		
Emission Point: ACEA5			Building: 2
Height (ft.): 43	Diameter (in.): 6		
Emission Point: ACEA6			Building: 2
Height (ft.): 42	Diameter (in.): 6		
Emission Point: ACEA9			Building: 1
Height (ft.): 42	Diameter (in.): 6		

**Condition 8: Process Definition By Emission Unit**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5**

**Item 8.1:**

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

Emission Unit: E-U0001  
Process: P01  
Process Description:  
Fermentation of alcohol stock to produce vinegar in acetators.

Emission Source/Control: 000S1 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 000S2 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 000S3 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 000S4 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 000S5 - Control



Control Type: WET SCRUBBER

Emission Source/Control: 000S6 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 000S9 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00S10 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00S78 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 000A1 - Process

Emission Source/Control: 000A2 - Process

Emission Source/Control: 000A3 - Process

Emission Source/Control: 000A4 - Process

Emission Source/Control: 000A5 - Process

Emission Source/Control: 000A6 - Process

Emission Source/Control: 000A7 - Process

Emission Source/Control: 000A8 - Process

Emission Source/Control: 000A9 - Process

Emission Source/Control: 00A10 - Process

Emission Source/Control: 00A78 - Process

**Item 8.2:**

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

Emission Unit: E-U0002

Process: P02

Process Description: Emissions from raw storage and product tanks.

Emission Source/Control: TANKS - Process

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 9.1:**

The Compliance Demonstration activity will be performed for:



Emission Unit: E-U0001  
Process: P01

Emission Point: AC7-8  
Emission Source: 000A7

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

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-7, when operating by itself, is to have a minimum water flow of 0.1 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.1 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001  
Process: P01

Emission Point: AC7-8  
Emission Source: 000A8

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

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-8, when operating by itself, is to have a minimum water flow of 0.05 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.05 gallons per minute





Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001

Emission Point: AC7-8

Process: P01

Emission Source: 00A78

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-8 and A-7, when operating together, is to have a minimum water flow of 0.15 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.15 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001

Emission Point: ACE10

Process: P01

Emission Source: 00A10

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 12.2:**



Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-10 is to have a minimum water flow of 0.9 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.9 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001

Emission Point: ACEA1

Process: P01

Emission Source: 000A1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-1 is to have a minimum water flow of 0.6 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.6 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**



**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001                      Emission Point: ACEA2  
Process: P01                                      Emission Source: 000A2

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

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through  
the wet scrubber. The scrubber for acetator A-2 is to  
have a minimum water flow of 0.6 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.6 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001                      Emission Point: ACEA3  
Process: P01                                      Emission Source: 000A3

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

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through  
the wet scrubber. The scrubber for acetator A-3 is to  
have a minimum water flow of 0.6 gallons per minute.

Manufacturer Name/Model Number: FRP



Parameter Monitored: WATER  
Lower Permit Limit: 0.6 gallons per minute  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001                      Emission Point: ACEA4  
Process: P01                                      Emission Source: 000A4

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

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through  
the wet scrubber. The scrubber for acetator A-4 is to  
have a minimum water flow of 0.6 gallons per minute.

Manufacturer Name/Model Number: FRP  
Parameter Monitored: WATER  
Lower Permit Limit: 0.6 gallons per minute  
Monitoring Frequency: WEEKLY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001                      Emission Point: ACEA5  
Process: P01                                      Emission Source: 000A5

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



**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-5 is to have a minimum water flow of 0.3 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.3 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Item 18.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001

Emission Point: ACEA6

Process: P01

Emission Source: 000A6

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through the wet scrubber. The scrubber for acetator A-6 is to have a minimum water flow of 0.3 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.3 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 19: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**



**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 19.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0001                      Emission Point: ACEA9  
Process: P01                                      Emission Source: 000A9

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

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A weekly log is to be kept noting the water flow through  
the wet scrubber. The scrubber for acetator A-9 is to  
have a minimum water flow of 0.6 gallons per minute.

Manufacturer Name/Model Number: FRP

Parameter Monitored: WATER

Lower Permit Limit: 0.6 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 20: Compliance Demonstration**  
**Effective between the dates of 12/04/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5**

**Item 20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-U0002

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

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The matrix developed by the facility to catalogue all of  
its storage tanks is to be maintained and updated on a  
continuous basis. The matrix is to include at a minimum,  
the identification of each storage tank, its capacity,  
contents, through put (vinegar through put to be updated  
every 5 years), size and VOC emissions in pounds per year



per tank. The completed matrix for each calendar year is to be kept on site for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 8-5438-00001/00003

Facility DEC ID: 8543800001

