

Facility DEC ID: 8544200047

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 8-5442-00047/02002  
Effective Date: 01/14/2021 Expiration Date: 01/13/2031

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

Contact: JOHN C PRAHLER  
MIZKAN AMERICA INC  
1661 FEEHANVILLE DR STE 300  
MT PROSPECT, IL 60056  
(847) 590-0059

Facility: MIZKAN AMERICA INC  
7673 SODUS CENTER RD  
SODUS, NY 14551

Description:  
Facility is applying for a State Permit, to include treatment to below 50 tons per year of VOC emissions, achieved through the installation of one (1) feedstock recovery units (FRU)/wet scrubber on the vinegar acetator and generators.

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: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

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### 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.

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**Facility Level**

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**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**

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**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

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

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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1661 FEEHANVILLE DR STE 300  
MOUNT PROSPECT, IL 60056

Facility: MIZKAN AMERICA INC  
7673 SODUS CENTER RD  
SODUS, NY 14551

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

Permit Effective Date: 01/14/2021

Permit Expiration Date: 01/13/2031

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NOTE: \* preceding the condition number indicates capping.

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**FEDERALLY ENFORCEABLE CONDITIONS**

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.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**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

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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

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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 01/14/2021 and 01/13/2031**

**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

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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 01/14/2021 and 01/13/2031**

**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 3: Facility Permissible Emissions**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 3.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0	PTE: 58,518 pounds per year
Name: VOC	

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**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 Subpart 201-6

**Item 4.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission

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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 period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 4.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

In order to limit emissions below applicability thresholds for 6 NYCRR Part 201-6 (Major Stationary Sources), the facility owner or operator shall ensure that emissions of VOCs from all emission sources at the facility do not exceed 49 tons per year (tpy) during any 12-month period. Emission sources include vinegar production, receiving, transferring, and processing (packaging/bottling).

In order to demonstrate compliance with this requirement, VOC emissions from each emission source operated on site shall be tracked monthly and on a twelve (12) month rolling total basis using purchase records, material usage and production records, and/or engineering calculations to calculate the actual emissions.

The facility owner or operator shall maintain records of the monthly and twelve (12) month rolling total emissions,

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and the calculations, production data, and all other information used to determine compliance with this condition at the facility for a period of at least five years.

The facility owner or operator shall submit a compliance certification to the Department on an annual basis that includes a summary of the calculations and data used to demonstrate compliance with this requirement.

Parameter Monitored: VOC

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

Subsequent reports are due every 6 calendar month(s).

**Condition 5: Notification**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**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**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**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 7: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 7.2:**

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.

VOCs and other organic compounds which achieve compliance with SGC/AGC for ambient impacts at their respective emission rate potentials (ERPs), are assigned an environmental ratings comparable to initial ratings identified in the Department's Annual and Short-term Guideline Concentration (AGC/SGC) tables. Acetaldehyde has been assigned and environmental rating A.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for 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.

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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 9: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable Federal Requirement: 6 NYCRR 225-1.2 (h)**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installations that fire distillate oil are limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016. 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 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

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

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
Process: 015

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

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The FRUs shall be operated at all times the respective emission sources 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 11:    Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
Process: 015

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

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase, the facility owner or operator must establish the lower permit limit and upper permit limit for pressure drop (in inches of water) to be used as surrogate parameters for the operation of control devices. These limits must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe.

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

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002

Process: 015

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase of the feedstock recovery units (FRUs)/wet scrubber units, the facility owner or operator must establish the lower permit limit flow rate for water (in gallons per minute) to be used as surrogate parameter for the operation of control devices. This limit must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe. The tentative design lower limit flow rate is 4 gallons per minute.

Water flow rate will be set with a manual valve and

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

monitored with an integral digital display. 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. Flow rate is to be monitored and recorded once per day in the facility log book.

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002

Process: 015

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall conduct an initial performance test of the feedstock recovery units (FRUs)/wet scrubber units within 180 days of startup. As part of that test, the facility owner or operator shall establish inlet duct conditions (emission factors) and outlet stack conditions to determine the destruction and removal efficiency (recovery efficiency) for VOC. This emission factor shall be used to determine appropriate operation parameters of the FRUs and demonstrate meeting 90% control efficiency.

These emission factors shall be used for tracking the twelve (12) month rolling total emissions of VOC and acetaldehyde.

The initial performance testing test protocol shall be submitted to the Department at least 30 days prior to the performance test date.

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004

Process: 006

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall conduct an initial performance test of the feedstock recovery units (FRUs)/wet scrubber units within 180 days of startup. As part of that test, the facility owner or operator shall establish inlet duct conditions (emission factors) and outlet stack conditions to determine the destruction and removal efficiency (recovery efficiency) for VOC. This emission factor shall be used to determine appropriate operation parameters of the FRUs and demonstrate meeting 90% control efficiency.

These emission factors shall be used for tracking the twelve (12) month rolling total emissions of VOC and acetaldehyde.

The initial performance testing test protocol shall be submitted to the Department at least 30 days prior to the performance test date.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

Emission Unit: E-00004  
 Process: 006

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:

Within 30 days of the completion of the design phase of the feedstock recovery units (FRUs)/wet scrubber units, the facility owner or operator must establish the lower permit limit flow rate for water (in gallons per minute) to be used as surrogate parameter for the operation of control devices. This limit must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe. The tentative design lower limit flow rate is 5 gallons per minute.

Water flow rate will be set with a manual valve and monitored with an integral digital display. 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. Flow rate is to be monitored and recorded once per day in the facility log book.

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004  
 Process: 006

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

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase, the facility owner or operator must establish the lower permit limit and upper permit limit for pressure drop (in inches of water) to be used as surrogate parameters for the operation of control devices. These limits must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe.

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

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004  
 Process: 006

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

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The FRUs shall be operated at all times the respective emission sources 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

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

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

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

**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 by 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 be demonstrated 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 permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize 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 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 upset 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. Facility owners and/or operators must submit the records

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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 01/14/2021 and 01/13/2031**

**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 01/14/2021 and 01/13/2031**

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

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

**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 20: Emission Unit Definition**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 20.1:**

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

Emission Unit: E-00002

Emission Unit Description:

Fermentation Process 014- Wine Batch Tanks (2 Tanks).

Apple or Grape concentrate and water are blended and transferred to either the vinegar fermenters (Process 003) or the wine fermenters (Process 015).

Process 003 – Vinegar Fermentation (3 Fermenters)

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

Fruit juice is fermented to either apple wine stock (AWS), red wine stock (RWS), or malt stock. Malt stock is transferred into a stock tank (E-00003). AWS and RWS are run through a sealed centrifuge (no emissions) and then transferred into a stock tank (E-00003).

Process 015 – Wine Fermentation (4 fermenters, feedstock recovery unit FRU02)

Fruit juice is fermented to either apple wine stock (AWS) or red wine stock (RWS), run through a sealed centrifuge (no emissions), and then transferred into a stock tank (E-00003). Exhaust air from the fermenters is piped to FRU02. Water from FRU02 is discharged to a recovered feedstock tank (Process 016, Tank 91).

Process 016 – Recovered Feedstock Tank (1 Tank)

Discharge water from FRU02 is stored for use as makeup water in the wine batch tanks (Process 014).

**Item 20.2:**

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

Emission Unit: E-00003

Emission Unit Description:

Stock Tanks (10 tanks, of which 6 are exempt from permitting) Process 017 – AWS Tanks (4 tanks)

Apple wine stock is stored until fed to generators 82, 83 and acetator 88 for vinegar production (E-00004 Process 006).

Process 004 – Stock Tanks (1 tank, exempt)

Malt stock from the fermenters, is stored until fed to generators 82, 83 and acetator 88 for vinegar production (E-00004 Process 006). This emission unit also include a tank storing fermented stock that is exempt from permitting.

RWS Tanks (5 Tanks, all of which are exempt)

Red wine stock is stored until fed to generators 80, 81 and 84 for red wine vinegar production (E-00004, Process 005).

Emissions calculations for the stock tanks include working and standing losses from all tanks, including those exempts from permitting.

**Item 20.3:**

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

Emission Unit: E-00004

Emission Unit Description:

Vinegar Production – generators (5), acetator (1), defoamer tank (1), feedstock recovery unit (FRU01), recovered feedstock tank (1). Wine or fermented stock

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Facility DEC ID: 8544200047

(E-00003) is fed to a primary and then secondary generator/acetator where more ingredients and/or nutrients may be added and the vinegar is produced and discharged to tanks (E-00005).

Process 005 – Generators 80, 81, 84  
Generators 80, 81, act as primary generators for secondary generator 84. Exhaust air and any overflow or foam are piped to a collection box and condense.

Process 006 – Generators 82, 83, Acetator 88, FRU01, Foam Tank

Acetator 88 is the primary acetator for generators 82 and 83. Exhaust air any overflow or foam are piped to the defoamer tank, which is used to capture condensation and accidental overflows of liquid or foam. Liquid trapped in the defoamer (k.o.) tank is added to the product discharge tanks (E-00005) prior to filtration. The existing foam tanks (Tank 89, currently 8,000 gallons; and Tank 90, currently 15,000 gallons) are to be replaced at the time of the FRU01 installation with one 8,200 gallon FRP tank (Tank 90). Exhaust from the Foam Tank is piped to FRU01, and water from FRU01 is discharged to a recovered feedstock unit (process 018, Tank 92).

Process 018 – Recovered Feedstock Tank (1 tank)  
Discharge water from FRU01 is stored for use as makeup water in the wine batch tanks (E-00002, Process 014).

Building(s): GR

**Item 20.4:**

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

Emission Unit: E-00005

Emission Unit Description:

Discharge Tanks (4)

Every 12 hours a discharge from the acetator/generators is moved to these holding tanks.

**Item 20.5:**

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

Emission Unit: E-00008

Emission Unit Description:

Filtration

Vinegar is processed through a tangential crossflow filtration system, in which product passes through ceramic membranes, controlled by transmembrane pressure and a minimum flow rate, to remove suspended solids.

Emissions associated with this process occur at the tanks feeding the filtration system and the tanks receiving the filtration product. These emissions are calculated with

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Facility DEC ID: 8544200047

Product Handling process E-00005 (Discharge Tanks) and E-00007 (Filtration Discharge). No VOC emissions are expected at the ceramic filter itself.

Process 010 – Rotovac filter backup  
The existing Rotovac filter will be retained on-site for use as a backup to ceramic filter. If this situation arises, two storage tanks would be re-purposed from Cutting/Storage Tanks (E-00009) and the unfiltered vinegar in the Discharge Tanks (E-00005) would be run through the unheated bentonite treatment and pre-coat tanks, then to the Rotovac filter and discharged to the Filtration Discharge Tanks (E-00007).

Emissions through the unheated bentonite treatment and pre-coat tanks are not expected to be substantively different from the emissions for those tanks when in cutting/storage service, and so are not calculated separately. The only additional emissions expected in this backup situation are those associated with the Rotovac filter itself.

Building(s): FD

**Item 20.6:**

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

Emission Unit: E-00009

Emission Unit Description:

Blending/Cutting/Storage Tanks (39, of which 23 are exempt)

Filtered vinegar is transferred to holding tanks where it is further cut and/or blended to achieve final concentrations and then stored.

The emission calculations include working and standing losses from all tanks, including those exempt from permitting.

**Item 20.7:**

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

Emission Unit: E-00010

Emission Unit Description:

Bulk Packaging - Finished vinegar is bulk packaged, into either drums or totes or tankers.

Building(s): FD

**Condition 21: Renewal deadlines for state facility permits  
Effective between the dates of 01/14/2021 and 01/13/2031**

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

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

**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 22: Compliance Demonstration**  
Effective between the dates of 01/14/2021 and 01/13/2031

**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 1/30/2021.

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

**Condition 23: Air pollution prohibited**  
Effective between the dates of 01/14/2021 and 01/13/2031

**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.

**Condition 24: Compliance Demonstration**  
Effective between the dates of 01/14/2021 and 01/13/2031

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

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

**Item 24.1:**

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

Emission Unit: E-00004 Process: 006	Emission Point: ST001 Emission Source: T0082
Emission Unit: E-00004 Process: 006	Emission Point: ST001 Emission Source: T0083
Emission Unit: E-00004 Process: 006	Emission Point: ST001 Emission Source: T0088
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC
CAS No: 000075-07-0	ACETALDEHYDE

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall maintain a written log of all maintenance activities performed on the feed stock recovery units. The log shall contain the date and time of each maintenance activity and a description of the work performed.

Downtime hours shall be tracked and recorded as a rolling yearly average. An allowance of 48 hours/year downtime for FRU/wet scrubber.

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 25: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 25.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

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 to less than 950 pounds per year based on the operation of two feedstock recovery units (FRUs)/wet scrubber (FRU01 and FRU02) 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. The FRUs will be operated at all times the respective emission sources 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 AVERAGE - ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 26: Emission Point Definition By Emission Unit  
Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 26.1:**

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

Emission Unit: E-00002

Emission Point: CP071

Height (ft.): 39

Diameter (in.): 3

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Facility DEC ID: 8544200047

NYTMN (km.): 4785.737 NYTME (km.): 335.861

Emission Point: CP072  
 Height (ft.): 39 Diameter (in.): 3  
 NYTMN (km.): 4785.741 NYTME (km.): 335.864

Emission Point: CP073  
 Height (ft.): 39 Diameter (in.): 3  
 NYTMN (km.): 4785.746 NYTME (km.): 335.866

Emission Point: FP091  
 Height (ft.): 27 Diameter (in.): 1  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

Emission Point: ST008  
 Height (ft.): 31 Diameter (in.): 4  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

**Item 26.2:**

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

Emission Unit: E-00003

Emission Point: CP099  
 Height (ft.): 69 Diameter (in.): 1  
 NYTMN (km.): 4785.732 NYTME (km.): 335.857

Emission Point: TF105  
 Height (ft.): 31 Diameter (in.): 1  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

Emission Point: TF106  
 Height (ft.): 31 Diameter (in.): 1  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

Emission Point: TF107  
 Height (ft.): 31 Diameter (in.): 1  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

**Item 26.3:**

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

Emission Unit: E-00004

Emission Point: FP092  
 Height (ft.): 27 Diameter (in.): 1  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

Emission Point: ST001  
 Height (ft.): 30 Diameter (in.): 7  
 NYTMN (km.): 4785.726 NYTME (km.): 335.866 Building: GR

Emission Point: ST002

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Height (ft.): 34                      Diameter (in.): 8  
 NYTMN (km.): 4785.737    NYTME (km.): 335.87      Building: GR

Emission Point: ST003  
 Height (ft.): 40                      Diameter (in.): 8  
 NYTMN (km.): 4785.743    NYTME (km.): 335.879      Building: GR

**Item 26.4:**

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

Emission Unit: E-00005

Emission Point: CP076  
 Height (ft.): 26                      Diameter (in.): 2  
 NYTMN (km.): 4785.739    NYTME (km.): 335.855

Emission Point: CP077  
 Height (ft.): 27                      Diameter (in.): 2  
 NYTMN (km.): 4785.743    NYTME (km.): 335.857

Emission Point: CP078  
 Height (ft.): 26                      Diameter (in.): 1  
 NYTMN (km.): 4785.746    NYTME (km.): 335.86

Emission Point: CP079  
 Height (ft.): 27                      Diameter (in.): 1  
 NYTMN (km.): 4785.749    NYTME (km.): 335.862

**Item 26.5:**

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

Emission Unit: E-00008

Emission Point: ST004  
 Height (ft.): 11                      Diameter (in.): 8  
 NYTMN (km.): 4785.707    NYTME (km.): 335.825      Building: FD

Emission Point: ST005  
 Height (ft.): 11                      Diameter (in.): 8  
 NYTMN (km.): 4785.706    NYTME (km.): 335.824      Building: FD

Emission Point: ST006  
 Height (ft.): 12                      Diameter (in.): 12  
 NYTMN (km.): 4785.701    NYTME (km.): 335.821      Building: FD

**Item 26.6:**

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

Emission Unit: E-00009

Emission Point: TF030  
 Height (ft.): 20                      Diameter (in.): 1  
 NYTMN (km.): 4785.765    NYTME (km.): 335.834

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Emission Point: TF050		
Height (ft.): 25	Diameter (in.): 1	
NYTMN (km.): 4785.771	NYTME (km.): 335.821	
Emission Point: TF051		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.764	NYTME (km.): 335.818	
Emission Point: TF052		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.765	NYTME (km.): 335.813	
Emission Point: TF053		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.76	NYTME (km.): 335.816	
Emission Point: TF054		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.762	NYTME (km.): 335.811	
Emission Point: TF055		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.756	NYTME (km.): 335.813	
Emission Point: TF056		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.75	NYTME (km.): 335.809	
Emission Point: TF057		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.751	NYTME (km.): 335.803	
Emission Point: TF058		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.746	NYTME (km.): 335.806	
Emission Point: TF059		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.746	NYTME (km.): 335.802	
Emission Point: TF060		
Height (ft.): 31	Diameter (in.): 1	
NYTMN (km.): 4785.742	NYTME (km.): 335.803	
Emission Point: TF101		
Height (ft.): 56	Diameter (in.): 1	
NYTMN (km.): 4785.774	NYTME (km.): 335.832	
Emission Point: TF102		
Height (ft.): 56	Diameter (in.): 1	
NYTMN (km.): 4785.777	NYTME (km.): 335.828	

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Emission Point: TF103  
 Height (ft.): 56 Diameter (in.): 1  
 NYTMN (km.): 4785.779 NYTME (km.): 335.823

Emission Point: TF104  
 Height (ft.): 56 Diameter (in.): 1  
 NYTMN (km.): 4785.782 NYTME (km.): 335.819

**Item 26.7:**

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

Emission Unit: E-00010

Emission Point: FD001  
 Height (ft.): 20 Diameter (in.): 1  
 NYTMN (km.): 4785.71 NYTME (km.): 335.857

**Condition 27: Process Definition By Emission Unit  
 Effective between the dates of 01/14/2021 and 01/13/2031**

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

**Item 27.1:**

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

Emission Unit: E-00002  
 Process: 003 Source Classification Code: 3-02-011-06  
 Process Description:  
 Fermenters (3)

Blended fruit juice is fermented and then discharged to stock tank (E-00003)

- Emission Source/Control: T0071 - Process
- Emission Source/Control: T0072 - Process
- Emission Source/Control: T0073 - Process

**Item 27.2:**

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

Emission Unit: E-00002  
 Process: 014 Source Classification Code: 4-07-008-98  
 Process Description:  
 Wine Batch Tanks (2)

Water and apple or grape concentrate are blended and then fed to the fermenters (Process 003 or Process 015).

- Emission Source/Control: TNT-2 - Process
- Emission Source/Control: TNT-6 - Process



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Emission Source/Control: T0099 - Process

Emission Source/Control: T0105 - Process

Emission Source/Control: T0106 - Process

Emission Source/Control: T0107 - Process

**Item 27.6:**

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

Emission Unit: E-00004

Process: 005

Source Classification Code: 3-01-132-10

Process Description:

Vinegar Generators 80, 81 and 84

Fermented stock is fed to primary generator 80 or 81 and then to secondary generator 84 where more ingredients and/or nutrients may be added and the vinegar is produced and discharged to tanks (E-00005). Exhaust air and liquid foam are piped to a collection box and condense.

Emission Source/Control: T0080 - Process

Emission Source/Control: T0081 - Process

Emission Source/Control: T0084 - Process

**Item 27.7:**

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

Emission Unit: E-00004

Process: 006

Source Classification Code: 3-01-132-10

Process Description:

Vinegar Acetator 88, Generators 82 and 83, with Feedstock Recovery Unit FRU01 (to be installed within 7 months of an issued permit). Acetator 88 is primary cetator for generators 82 and 83. Exhaust air and any overflow or foam are piped to one of two defoamer (k.o.) tanks, which are used to store condensation and accidental overflows of liquid or foam. Liquid trapped in the k.o. tanks is added to the product discharge tanks (E-00005) prior to filtration. The existing foam tanks (T089, currently 8,000 gallons; and T090, currently 15,000 gallons) are to be replaced at the time of the FRU01 installation with one 8,200 gallon FRP tank (Tank 90), which is exempt from permitting. Exhaust from the foam tank is piped to FRU01, and water from FRU01 is discharged to a recovered feedstock tank (Process 018, Tank 92).

Emission Source/Control: FRU01 - Control

Control Type: WET SCRUBBER

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Emission Source/Control: T0082 - Process

Emission Source/Control: T0083 - Process

Emission Source/Control: T0088 - Process

**Item 27.8:**

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

Emission Unit: E-00004

Process: 018

Source Classification Code: 4-07-008-98

Process Description:

Recovered Feedstock Tank (1)

Recovered feedstock from FRU01 is discharged to the recovered feedstock tank for use as makeup water in the wine batch tanks (Process 014).

Emission Source/Control: T0092 - Process

**Item 27.9:**

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

Emission Unit: E-00005

Process: 007

Source Classification Code: 4-07-008-98

Process Description:

Discharge Tanks (4)

Vinegar is discharged from the generators/acetator to these storage tanks.

Emission Source/Control: T0076 - Process

Emission Source/Control: T0077 - Process

Emission Source/Control: T0078 - Process

Emission Source/Control: T0079 - Process

**Item 27.10:**

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

Emission Unit: E-00008

Process: 010

Source Classification Code: 4-07-008-98

Process Description:

The existing Rotovac filter will be retained on-site for use as a backup to the ceramic filter. If this situation arises, the unfiltered vinegar in the Discharge Tanks (E-00005) would be run through unheated bentonite treatment and pre-coat tanks, then to the Rotovac filter and discharged to the Filtration Discharge Tanks (E-00007).

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Rotovac operation is limited by production throughput through the generators/aacetator.

Emission Source/Control: EQ001 - Process

**Item 27.11:**

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

Emission Unit: E-00009

Process: 011

Source Classification Code: 4-07-008-98

Process Description:

Cutting/Storage Tanks (39, of which 23 are exempt)

Filtered vinegar is transferred to holding tanks where it is further cut and/or blended to achieve final concentrations and then stored.

Emission Source/Control: T0030 - Process

Emission Source/Control: T0050 - Process

Emission Source/Control: T0051 - Process

Emission Source/Control: T0052 - Process

Emission Source/Control: T0053 - Process

Emission Source/Control: T0054 - Process

Emission Source/Control: T0055 - Process

Emission Source/Control: T0056 - Process

Emission Source/Control: T0057 - Process

Emission Source/Control: T0058 - Process

Emission Source/Control: T0059 - Process

Emission Source/Control: T0060 - Process

Emission Source/Control: T0101 - Process

Emission Source/Control: T0102 - Process

Emission Source/Control: T0103 - Process

Emission Source/Control: T0104 - Process

**Item 27.12:**

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

Emission Unit: E-00010  
Process: 012 Source Classification Code: 3-02-999-98  
Process Description:  
Bulk Packaging - Finished vinegar is bulk packaged into either drums/totes or tankers.

Emission Source/Control: PKG01 - Process

**Condition 28: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 28.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
Process: 015

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:

The Facility owner or operator shall not allow emissions of the air contaminant(s) listed above to exceed the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air contaminants. The above listed contaminants have been given an Environmental Rating of “A” for the associated process emission source. One or more of the listed contaminants have been demonstrated to have an emission rate potential (ERP) of greater than 0.1 pounds/hour to 1 pounds/hour and therefore the facility must maintain a control efficiency of at least 90% when this process is in operation.

The facility must maintain records to demonstrate that none of the contaminants have had an increased ERP. Any increase in the ERP of a contaminant will require a reevaluation of its ambient impacts and environmental rating.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 29: Compliance Demonstration**

Permit ID: 8-5442-00047/02002

Facility DEC ID: 8544200047

Effective between the dates of 01/14/2021 and 01/13/2031

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 29.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
Process: 015

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

**Item 29.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase, the facility owner or operator must establish the lower permit limit and upper permit limit for pressure drop (in inches of water) to be used as surrogate parameters for the operation of control devices. These limits must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe.

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

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 30: Compliance Demonstration**  
Effective between the dates of 01/14/2021 and 01/13/2031

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 30.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
Process: 015

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

**Item 30.2:**

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase of the feedstock recovery units (FRUs)/wet scrubber units, the facility owner or operator must establish the lower permit limit flow rate for water (in gallons per minute) to be used as surrogate parameter for the operation of control devices. This limit must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe. The tentative design lower limit flow rate is 4 gallons per minute.

Water flow rate will be set with a manual valve and monitored with an integral digital display. 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. Flow rate is to be monitored and recorded once per day in the facility log book.

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 31: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable State Requirement: 6 NYCRR 212-2.3 (b)**

**Item 31.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
 Process: 015

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

**Item 31.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The FRUs shall be operated at all times the respective emission sources are operating with an allowance of 48 hours per year for downtime per FRU/wet scrubber for

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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: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 32: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 32.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002  
 Process: 015

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

**Item 32.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall conduct an initial performance test of the feedstock recovery units (FRUs)/wet scrubber units within 180 days of startup. As part of that test, the facility owner or operator shall establish inlet duct conditions (emission factors) and outlet stack conditions to determine the destruction and removal efficiency (recovery efficiency) for VOC and Acetaldehyde. These emission factors shall be used to determine appropriate operation parameters of the FRUs and demonstrate meeting 90% control efficiency.

These emission factors shall be used for tracking the twelve (12) month rolling total emissions of VOC and acetaldehyde.

The initial performance testing test protocol shall be submitted to the Department at least 30 days prior to the performance test date.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 33: Compliance Demonstration**  
Effective between the dates of 01/14/2021 and 01/13/2031

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 33.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004

Process: 006

Regulated Contaminant(s):

CAS No: 000075-07-0 ACETALDEHYDE

**Item 33.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The FRUs shall be operated at all times the respective emission sources 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: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 34: Compliance Demonstration**  
Effective between the dates of 01/14/2021 and 01/13/2031

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 34.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004

Process: 006

Permit ID: 8-5442-00047/02002

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

**Item 34.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall conduct an initial performance test of the feedstock recovery units (FRUs)/wet scrubber units within 180 days of startup. As part of that test, the facility owner or operator shall establish inlet duct conditions (emission factors) and outlet stack conditions to determine the destruction and removal efficiency (recovery efficiency) for VOC and Acetaldehyde. These emission factors shall be used to determine appropriate operation parameters of the FRUs and demonstrate meeting 90% control efficiency.

These emission factors shall be used for tracking the twelve (12) month rolling total emissions of VOC and acetaldehyde.

The initial performance testing test protocol shall be submitted to the Department at least 30 days prior to the performance test date.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 35: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 35.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004  
 Process: 006

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

**Item 35.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility owner or operator shall not allow emissions of the air contaminant(s) listed above to exceed the

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requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air contaminants. The above listed contaminants have been given an Environmental Rating of “A” for the associated process emission source. One or more of the listed contaminants have been demonstrated to have an emission rate potential (ERP) of greater than 0.1 pounds/hour to 1 pounds/hour and therefore the facility must maintain a control efficiency of at least 90% when this process is in operation.

The facility must maintain records to demonstrate that none of the contaminants have had an increased ERP. Any increase in the ERP of a contaminant will require a reevaluation of its ambient impacts and environmental rating.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 36: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable State Requirement: 6 NYCRR 212-2.3 (b)**

**Item 36.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004  
 Process: 006

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

**Item 36.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase, the facility owner or operator must establish the lower permit limit and upper permit limit for pressure drop (in inches of water) to be used as surrogate parameters for the operation of control devices. These limits must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe.

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

Records shall be maintained at the facility for a period

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of at least 5 years, and must be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 37: Compliance Demonstration**  
**Effective between the dates of 01/14/2021 and 01/13/2031**

**Applicable State Requirement: 6 NYCRR 212-2.3 (b)**

**Item 37.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00004  
 Process: 006

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

**Item 37.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within 30 days of the completion of the design phase of the feedstock recovery units (FRUs)/wet scrubber units, the facility owner or operator must establish the lower permit limit flow rate for water (in gallons per minute) to be used as surrogate parameter for the operation of control devices. This limit must be approved by the Department and an application for modification of the existing State Facility permit must be made within this timeframe. The tentative design lower limit flow rate is 5 gallons per minute.

Water flow rate will be set with a manual valve and monitored with an integral digital display. 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. Flow rate is to be monitored and recorded once per day in the facility log book.

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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