



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

5/9/2016

Certified Mail

Dave Schriever
 Givaudan Flavors Corporation
 110 E. 70th St.
 Cincinnati, OH 45216

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431070914
 Permit Number: P0120624
 Permit Type: Administrative Modification
 County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall and Southwest Ohio Air Quality Agency
 Permit Review/Development Section 250 William Howard Taft Rd.
 Ohio EPA, DAPC Cincinnati, OH 45219
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael E. Hopkins, P.E.
 Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
 SWOAQA; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Givaudan Flavors Corporation operates a flavor manufacturing facility in Cincinnati, Ohio (Hamilton County) and is currently classified as a synthetic minor facility for HAPs to avoid Title V. This permit action is an Administrative Modification to emission unit P005 to remove the control efficiency requirement listed in the permit terms. The permittee requested the removal of the 50% control efficiency of VOCs for the packed bed scrubber noting that the removal efficiency of organic compounds by a packed bed scrubber is highly dependent on the type of organic matter rather than the quantity. The facility conducted an emissions test in 2014 that demonstrated that the source met the organic compound mass emission limitation in the permit terms, but failed to meet the control efficiency requirement. SWOAQA agreed to remove the control efficiency as the Consent Decree that required the scrubber, did not require any particular control efficiency. The permit action will clarify the federally enforceable requirements of Consent Order Case No. A0307869 filed with the Common Pleas Courts on 10/15/03.

3. Facility Emissions and Attainment Status:

Givaudan Flavors Corporation is located in Hamilton County which is in attainment for all pollutants except the 8-hour ozone standard. The facility is a synthetic minor for HAPs to avoid TV.

During this renewal review, SWOAQA determined that the facility would also be TV for VOC's without the federally enforceable requirement to run the control devices required in the consent decree. While SWOAQA understands that the consent decree required the use of the control devices to be federally enforceable and notes that the permits resulting from the signing of the consent decree were issued in draft, it is our desire to associate this requirement with the Ohio Administrative Code rule 3745-31-05(D) to ensure further clarity in the future

4. Source Emissions:

Givaudan Flavors Corporation will operate under a facility wide synthetic minor limitation for HAPs and will continue to employ the federally enforceable control devices required by the consent decree signed on 10/15/03 limiting VOC emissions to below the major source threshold and thus avoiding TV permitting.

5. Conclusion:

This permit continues to contain federally enforceable requirements that ensure the HAP and VOC emissions for the facility are maintained below Title V applicability threshold. Monthly monitoring, record keeping and annual reporting will be required to monitor compliance

6. Please provide additional notes or comments as necessary:

None



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>7.01</u>
<u>PE/PM10</u>	<u>1.97</u>
Individual HAP	<u>9.9</u>
Combined HAPs	<u>24.9</u>

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:<http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Administrative Modification
Givaudan Flavors Corporation

110 E. 70th St., Cincinnati, OH 45216

ID#:P0120624

Date of Action: 5/9/2016

Permit Desc:Administrative Modification of spray dryer being completed at renewal. The permittee requested the removal of the 50% control efficiency of VOCs for packed bed scrubber noting that the removal efficiency of organic compounds by a packed bed scrubber is highly dependent on the type of organic matter rather than the quantity. The facility conducted an emissions test in 2014 that demonstrated that the source met the organic compound mass emission limitation in the permit terms, but failed to meet the control efficiency requirement. SWOAQA agreed to remove the control efficiency as the Consent Degree that required the scrubber, did not require any particular control efficiency. The permit action will clarify the federally enforceable requirements of Consent Order Case No. A0307869..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Givaudan Flavors Corporation**

Facility ID:	1431070914
Permit Number:	P0120624
Permit Type:	Administrative Modification
Issued:	5/9/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Givaudan Flavors Corporation

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Draft Permit-to-Install and Operate

Givaudan Flavors Corporation

Permit Number: P0120624

Facility ID: 1431070914

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431070914
Application Number(s): A0053361, A0055008
Permit Number: P0120624
Permit Description: Administrative Modification of spray dryer being completed at renewal. The permittee requested the removal of the 50% control efficiency of VOCs for packed bed scrubber noting that the removal efficiency of organic compounds by a packed bed scrubber is highly dependent on the type of organic matter rather than the quantity. The facility conducted an emissions test in 2014 that demonstrated that the source met the organic compound mass emission limitation in the permit terms, but failed to meet the control efficiency requirement. SWOAQA agreed to remove the control efficiency as the Consent Degree that required the scrubber, did not require any particular control efficiency. The permit action will clarify the federally enforceable requirements of Consent Order Case No. A0307869.
Permit Type: Administrative Modification
Permit Fee: \$100.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/9/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Givaudan Flavors Corporation
110 E. 70th St.
Cincinnati, OH 45216

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120624

Permit Description: Administrative Modification of spray dryer being completed at renewal. The permittee requested the removal of the 50% control efficiency of VOCs for packed bed scrubber noting that the removal efficiency of organic compounds by a packed bed scrubber is highly dependent on the type of organic matter rather than the quantity. The facility conducted an emissions test in 2014 that demonstrated that the source met the organic compound mass emission limitation in the permit terms, but failed to meet the control efficiency requirement. SWOAQA agreed to remove the control efficiency as the Consent Degree that required the scrubber, did not require any particular control efficiency. The permit action will clarify the federally enforceable requirements of Consent Order Case No. A0307869.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P005
Company Equipment ID:	Dry-007
Superseded Permit Number:	P0114727
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Givaudan Flavors Corporation
Permit Number: P0120624
Facility ID: 1431070914
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
Givaudan Flavors Corporation
Permit Number: P0120624
Facility ID: 1431070914
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2 through B.5.
2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001, B003, B004, P001, P002, P003, P004, P005, P020, P021, P022, P026, P027, P028, P030, P031, P032 P033, P034, P035 P036, P037, P038, P039, P040, P041, P042 P043, P044, P045, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2. including fugitive emissions from pumps, valves and connectors (for the entire facility):
 - a) the name and identification number/code of each HAP containing material employed;
 - b) the individual HAP emissions, in tons, for all the materials employed;
 - c) the combined HAPs emissions, in tons, for all the materials employed;
 - d) the rolling, 12-month individual HAP emissions, in tons; and
 - e) the rolling, 12-month combined HAPs emissions, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.
4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. deviations from the limitations outlined in term B.2.



Draft Permit-to-Install and Operate

Givaudan Flavors Corporation

Permit Number: P0120624

Facility ID: 1431070914

Effective Date: To be entered upon final issuance

- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency)

- 5. Compliance with the emission limitations in B.2. of these terms and conditions shall be demonstrated by the recordkeeping requirements specified in B.3.



Draft Permit-to-Install and Operate
Givaudan Flavors Corporation
Permit Number: P0120624
Facility ID: 1431070914
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P005, Dry-007

Operations, Property and/or Equipment Description:

Spray Dryer No. 7

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	<p>Volatile organic compound (VOC) emissions from the spray dryer shall not exceed 1.60 pounds per hour and 7.01 tons per year.</p> <p>Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) from the spray dryer shall not exceed 0.45 pound per hour and 1.97 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).</p> <p>See b)(2)b. and b)(2)c.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
d.	OAC rule 3745-31-05(D)	See Section B.2.

(2) Additional Terms and Conditions

- a. The hourly and annual emission limitations outlined in b)(1) are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limits.
- b. Compliance with OAC rule 3745-31-05(F) shall be demonstrated by the use of a packed bed scrubber with at least a 90% control efficiency for particulate emissions.
- c. The permittee shall also comply with the requirements of the Consent Order and Final Judgment Entry Case #A0307869 (State of Ohio vs. Givaudan Flavors Corporation) filed with the Hamilton County Clerk of Courts on October 15, 2003.

c) Operational Restrictions

- (1) The scrubber water flow rate for the packed bed scrubber shall be continuously maintained at a value of not less than 40 gallons per minute at all times while the emissions unit is in operation.
- (2) The scrubber water for the packed bed scrubber shall be continuously maintained at an oxidation reduction potential of not less than 600 mV at all times while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate and maintain equipment to continuously monitor the packed bed scrubber water flow rates during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the water flow rate on daily basis and keep a log of the downtime for the capture

(collection) system control device, and monitoring equipment, when the associated emissions unit was in operation.

Whenever the monitored value for the water flow rate falls below the value specified below when the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the water flow rate immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The minimum scrubber water flow rate for the packed bed scrubber shall be maintained at or above 40.0 gallons per minute at all times when the emissions unit is in operation.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the scrubber water flow rate based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the oxidation reduction potential for the packed bed scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (3) The permittee shall collect and record the following information each day:
 - a. The oxidation reduction potential, in millivolts, once each day.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the packed bed scrubber during the 12-month reporting period for this emissions unit:
 - a. each period of time when the scrubber water flow rate was outside of the acceptable range;
 - i. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - ii. an identification of any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
 - iii. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - iv. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
 - b. Each period of time when the oxidation reduction potential for the packed bed scrubber was not maintained at the required levels outlined in c)(2).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) and c) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compound (VOC) emissions from the spray dryer shall not exceed 1.6 pounds per hour and 7.01 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the dryer output ppm (128 ppm) by the dryer flow (2,170 ACFM) then by the conversion factor (5.76×10^{-6} lb/ACFM determined at 170 degrees Fahrenheit). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emission rates were provided in PTIO application A0053361, submitted August 10, 2015.

Emission Limitation:

Particulate emissions (PE) and particulate emissions 10 microns and less in diameter (PM10) from the spray dryer shall not exceed 0.45 pound per hour and 1.97 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the production rate (lbs/hr) by the loss factor (0.05) then by the control efficiency of the packed bed scrubber (1-.90). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emission rates were provided in PTIO application A0046943, submitted May 23, 2013.

b. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation:

Compliance with OAC rule 3745-31-05(F) shall be demonstrated by the use of a scrubber with at least a 90% control efficiency for particulate emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted no later than August 31, 2017.
- ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency and allowable mass emissions rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:

Particulates Method 5 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a

valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

d. Control Requirement:

The scrubber water flow rate for the packed bed scrubber shall be continuously maintained at a value of not less than 40 gallons per minute at all times while the emissions unit is in operation.

Applicable Compliance Method:

Compliance with the scrubber water flow rate restriction found in c)(1) shall be demonstrated by the record keeping requirements in d)(1).

e. Control Requirement:

The scrubber water for the packed bed scrubber shall be continuously maintained at an oxidation reduction potential of not less than 600 mV at all times while the emissions unit is in operation.

Applicable Compliance Method:

Compliance with the scrubber oxidation reduction potential restriction found in c)(2) shall be demonstrated by the record keeping requirements in d)(3).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new federally enforceable permit-to-install and operate.