



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

3/17/2009

JEFFERY WALLACE
T MARZETTI CO - ALLEN DIVISION
PO BOX 453
COLUMBUS, OH 43216

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125040161
Permit Number: P0104270
Permit Type: Renewal
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
T MARZETTI CO - ALLEN DIVISION**

Facility ID: 0125040161
Permit Number: P0104270
Permit Type: Renewal
Issued: 3/17/2009
Effective: 3/17/2009
Expiration: 3/17/2014



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 T MARZETTI CO - ALLEN DIVISION

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Final Permit-to-Install and Operate
Permit Number: P0104270
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Authorization

Facility ID: 0125040161
Application Number(s): M0000349
Permit Number: P0104270
Permit Description: Administrative modification for cooker scrubber parameters and stack height; PTI #01-08950
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/17/2009
Effective Date: 3/17/2009
Expiration Date: 3/17/2014
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15
This document constitutes issuance to:

T MARZETTI CO - ALLEN DIVISION
1709 FRANK RD
COLUMBUS, OH 43223

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104270
Facility ID: 0125040161
Effective Date: 3/17/2009

Authorization (continued)

Permit Number: P0104270
Permit Description: Administrative modification for cooker scrubber parameters and stack height; PTI #01-08950

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID: P001
Company Equipment ID: CJ # 1
Superseded Permit Number: 01-08950
General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
Company Equipment ID: CJ # 2
Superseded Permit Number:
General Permit Category and Type: Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104270

Facility ID: 0125040161

Effective Date: 3/17/2009

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 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 Ohio EPA DAPC, Central District Office 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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Effective Date: 3/17/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104270

Facility ID: 0125040161

Effective Date: 3/17/2009

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) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104270

Facility ID: 0125040161

Effective Date: 3/17/2009

C. Emissions Unit Terms and Conditions



1. P001, CJ # 1

Operations, Property and/or Equipment Description:

400-gallon Chester-Jensen Cooker/Cooler No. 1 with oxidizing wet scrubber

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. See 1.d(3) below.

(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 operations(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. 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(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 60.3 pounds per hour.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).</p>
b.	OAC rule 3745-31-05(D) (to avoid non-attainment review and to avoid being subject to Title V)	See b(2)c, c(3) and c(4), below.
c.	OAC rule 3745-21-07(G)(9)(f)	See A.2.d, below.



(2) Additional Terms and Conditions

- a. All gases from P001 shall be vented to the oxidizing wet scrubber whenever whiskey glaze, or any other type of batch that would cause a nuisance odor, is cooked.
- b. Odor emissions from P001 shall not cause a nuisance, in violation of OAC rule 3745-15-07.
- c. The emissions of VOC from emissions units P001 and P002 shall not exceed 60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- d. Exempt from the requirements of OAC rule 3745-21-07(G)(2) by using non-photochemically reactive materials.
- e. The hourly VOC emission limitation is based upon the emissions unit's potential to emit. Therefore no additional monitoring, record keeping, or reporting is necessary to determine compliance with this limit.

c) Operational Restrictions

- (1) The oxidizing wet scrubber shall be operated during the cooking process when any whiskey glaze, or any other type of batch that would cause a nuisance odor, is cooked.
- (2) The permittee shall operate the oxidizing wet scrubber in a manner that complies with the following restrictions:
 - a. The recirculating water flow rate shall not be less than 15 gallons per minute (gpm);
 - b. The pH of the hypochlorite scrubber solution shall be maintained within the range of 8.0 to 13.5;
 - c. The oxidation reduction potential (ORP) of the scrubber solution at the discharge from the scrubber shall be maintained between 350 millivolts and 1,175 millivolts (at a level that ensures that a residual amount of active chlorine is always present); and
 - d. There shall be no objectionable cooking odors in the exhaust gases from the oxidizing wet scrubber, detectable by smell off the permittee's property.
 - e. The exit height of the stack shall be no less than 35 feet from grade.
- (3) Compliance with the emission limitations as stated in Section A.2.c shall be achieved by restricting annual usage of whiskey. The maximum annual whisky usage for P001 and P002 shall not exceed 37,000 gallons, based upon a rolling, 12-month summation of the whisky gallon usage figures.



To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the whiskey gallon usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Whiskey Gallons Usage</u>
1	6,000
1-2	11,000
1-3	15,000
1-4	19,000
1-5	22,000
1-6	24,200
1-7	26,400
1-8	28,600
1-9	30,800
1-10	33,000
1-11	35,000
1-12	37,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual whiskey gallon usage shall be based upon a rolling, 12-month summation of the whiskey gallon usage figures.

(4) The ethanol content of the whiskey is restricted to 3.24 pounds per gallon.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water flow rate, the scrubber water pH, and the scrubber discharge water oxidation potential while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The following information shall be collect and recorded during the day when a batch of whiskey glaze, or any other type of batch that would cause a nuisance odor, is produced:

- a. The scrubber water flow rate, in gallons per minute;
- b. The scrubber water pH, measured in standard units;
- c. The scrubber water oxidation potential, in millivolts;
- d. The operating times for the control device, monitoring equipment, and the associated emissions unit; and



- e. The usage of whiskey, in gallons.
- (2) The permittee shall maintain monthly records of the following information:
- a. The ethanol content of the whiskey;
 - b. The total usage of whiskey, in gallons, for P001 and P002, combined, for each month; and
 - c. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the whiskey gallon usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative whiskey gallon usage for each calendar month.

- (3) The permit to install for these two (2) emissions units (P001 and P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m³): 1,880

Maximum Hourly Emission Rate (lbs/hr): $60.3 \times 2 = 120.6$

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 586

MAGLC (ug/m³): 44,762

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:



- a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports for the oxidizing wet scrubber that identify all deviations (excursions) of the operational restrictions specified in term B.2:
 - a. Recirculating water flow rate;
 - b. pH of the hypochlorite scrubber solution; and



- c. Oxidation reduction potential (ORP) of the scrubber solution at the discharge from the scrubber.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the cooking process was in operation and the oxidizing wet scrubber was not operated in accordance with the requirements specified in term B.1.
 - (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on whiskey gallon usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative whiskey gallon usage levels.
 - (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the ethanol content of the whiskey specified in term B.4
 - (5) These quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

VOC emissions shall not exceed 60.3 pounds per hour

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by multiplying, for this emissions unit, the amount of whiskey used per day, in gallons, times the weight of ethanol per gallon of whiskey, divided by the total number of hours of duration of the batches using whiskey during the day, according to the following formula:

$$E = (V \times W) / T, \text{ where}$$

E = VOC emissions, in pounds per hour,

V = the amount of whiskey used per day, in gallons,

W = the weight of ethanol per gallon of whiskey (3.24 pounds of ethanol per gallon, for 94 proof), and

T = the total number of hours of duration of the batches using whiskey during the day.



b. Emission Limitation:

The emissions of VOC from emissions units P001 and P002 shall not exceed 60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records maintained according to d)(2).

g) Miscellaneous Requirements

(1) None.



2. P002, CJ # 2

Operations, Property and/or Equipment Description:

400-gallon Chester-Jensen Cooker/Cooler No. 2 with oxidizing wet scrubber

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. See 2.d(3) below.

(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 operations(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. 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(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 60.3 pounds per hour.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-35-07(B).</p>
b.	OAC rule 3745-31-05(D) (to avoid non-attainment review and avoid being subject to Title V)	See b(2)c, c(3) and c(4), below.
c.	OAC rule 3745-21-07(G)(9)(f)	See A.2.d, below.



- (2) Additional Terms and Conditions
 - a. All gases from P002 shall be vented to the oxidizing wet scrubber whenever whiskey glaze, or any other type of batch that would cause a nuisance odor, is cooked.
 - b. Odor emissions from P002 shall not cause a nuisance, in violation of OAC rule 3745-15-07.
 - c. The emissions of VOC from emissions units P001 and P002 shall not exceed 60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
 - d. Exempt from the requirements of OAC rule 3745-21-07(G)(2) by using non-photochemically reactive materials.
 - e. The hourly VOC emission limitation is based upon the emissions unit's potential to emit. Therefore no additional monitoring, record keeping, or reporting is necessary to determine compliance with this limit.
- c) Operational Restrictions
 - (1) The oxidizing wet scrubber shall be operated during the cooking process when any whiskey glaze, or any other type of batch that would cause a nuisance odor, is cooked.
 - (2) The permittee shall operate the oxidizing wet scrubber in a manner that complies with the following restrictions:
 - a. The recirculating water flow rate shall not be less than 15 gallons per minute (gpm);
 - b. The pH of the hypochlorite scrubber solution shall be maintained within the range of 8.0 to 13.5;
 - c. The oxidation reduction potential (ORP) of the scrubber solution at the discharge from the scrubber shall be maintained between 350 millivolts and 1,175 millivolts (at a level that ensures that a residual amount of active chlorine is always present); and
 - d. There shall be no objectionable cooking odors in the exhaust gases from the oxidizing wet scrubber, detectable by smell off the permittee's property.
 - e. The exit height of the stack shall be no less than 35 feet from grade.
 - (3) Compliance with the emission limitations as stated in Section A.2.c shall be achieved by restricting annual usage of whiskey. The maximum annual whisky usage for P001 and P002 shall not exceed 37,000 gallons, based upon a rolling, 12-month summation of the whisky gallon usage figures.



To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the whiskey gallon usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Whiskey Gallons Usage</u>
1	6,000
1-2	11,000
1-3	15,000
1-4	19,000
1-5	22,000
1-6	24,200
1-7	26,400
1-8	28,600
1-9	30,800
1-10	33,000
1-11	35,000
1-12	37,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual whiskey gallon usage shall be based upon a rolling, 12-month summation of the whiskey gallon usage figures.

- (4) The ethanol content of the whiskey is restricted to 3.24 pounds per gallon.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water flow rate, the scrubber water pH, and the scrubber discharge water oxidation potential while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The following information shall be collect and recorded during the day when a batch of whiskey glaze, or any other type of batch that would cause a nuisance odor, is produced:

- a. The scrubber water flow rate, in gallons per minute;
- b. The scrubber water pH, measured in standard units;
- c. The scrubber water oxidation potential, in millivolts;
- d. The operating times for the control device, monitoring equipment, and the associated emissions unit; and



- e. The usage of whiskey, in gallons.
- (2) The permittee shall maintain monthly records of the following information:
- a. The ethanol content of the whiskey;
 - b. The total usage of whiskey, in gallons, for P001 and P002, combined, for each month; and
 - c. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the whiskey gallon usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative whiskey gallon usage for each calendar month.

- (3) The permit to install for these two (2) emissions units (P001 and P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m³): 1,880

Maximum Hourly Emission Rate (lbs/hr): 60.3 x 2 = 120.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 586

MAGLC (ug/m³): 44,762

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:



- a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports for the oxidizing wet scrubber that identify all deviations (excursions) of the operational restrictions specified in term B.2:
 - a. Recirculating water flow rate;
 - b. pH of the hypochlorite scrubber solution; and



- c. Oxidation reduction potential (ORP) of the scrubber solution at the discharge from the scrubber.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the cooking process was in operation and the oxidizing wet scrubber was not operated in accordance with the requirements specified in term B.1.
 - (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on whiskey gallon usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative whiskey gallon usage levels.
 - (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the ethanol content of the whiskey specified in term B.4
 - (5) These quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

VOC emissions shall not exceed 60.3 pounds per hour

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by multiplying, for this emissions unit, the amount of whiskey used per day, in gallons, times the weight of ethanol per gallon of whiskey, divided by the total number of hours of duration of the batches using whiskey during the day, according to the following formula:

$E = (V \times W) / T$, where

E = VOC emissions, in pounds per hour,

V = the amount of whiskey used per day, in gallons,

W = the weight of ethanol per gallon of whiskey (3.24 pounds of ethanol per gallon, for 94 proof), and

T = the total number of hours of duration of the batches using whiskey during the day.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104270

Facility ID: 0125040161

Effective Date: 3/17/2009

b. Emission Limitation:

The emissions of VOC from emissions units P001 and P002 shall not exceed 60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records maintained according to d)(2).

g) Miscellaneous Requirements

(1) None.