Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

7/26/2011

Mr. Brad Kelley
Mane, Inc.
999 Tech Dr
Milford, OH 45150

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483060488
Permit Number: P0108065
Permit Type: Initial Installation
County: Warren

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: HCDOES

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mane, Inc.

Facility ID:	1483060488
Permit Number:	P0108065
Permit Type:	Initial Installation
Issued:	7/26/2011
Effective:	7/26/2011
Expiration:	3/13/2014

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mane, Inc.

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Authorization

Facility ID: 1483060488
Application Number(s): A0041726
Permit Number: P0108065
Permit Description: FEPTIO at an FEPTIO facility for the installation of three (3) new flavor capsule production lines with venturi scrubber and packed bed wet scrubbers.
Permit Type: Initial Installation
Permit Fee: $600.00
Issue Date: 7/26/2011
Effective Date: 7/26/2011
Expiration Date: 3/13/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Mane, Inc.
1093 Janet Way
Lebanon, OH 45036

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108065
Permit Description: FEPTIO at an FEPTIO facility for the installation of three (3) new flavor capsule production lines with venturi scrubber and packed bed wet scrubbers.

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

Group Name: Flavor capsule Line #s 6, 7, 8

Emissions Unit ID:	**P008**
Company Equipment ID:	Line #6
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	Line #7
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	Line #8
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.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 takenby 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 Hamilton County Dept. of Environmental Services 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[1] 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 emissions 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.

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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.

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) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Flavor capsule Line Nos. 6, 7, 8: P008,P009,P010,

EU ID	Operations, Property and/or Equipment Description
P008	Line No. 6 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system
P009	Line No. 7 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system
P010	Line No. 8 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system

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. b)(1)d).

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(A)(3), as effective 11/30/01	Emissions of volatile organic compounds (VOC) from the pan dryers (Line Nos. 6, 7, & 8, each line with Dryers A & B) with wet scrubbers shall not exceed 11.4 pounds per day from each emissions unit. Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.264 pound per day and 0.048 ton per year (TPY) from each emissions unit. See b)(2)a., b)(2)b., and f)(1)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V requirements for VOC emissions	Emissions of VOC from the pan dryers (Line Nos. 6, 7, & 8; each line with Dryers A & B) with wet scrubbers shall not exceed 2.08 TPY from each emissions unit, based upon a rolling, 12-month summation of the VOC emissions. See b)(2)d. and b)(2)e.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks serving each emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)	PE from each emissions unit shall not exceed 0.551 pound per hour.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) shall not apply to the PE/PM10 emissions from these air contaminant sources since the calculated annual emission rate for PE/PM10 is less than 10 tons/year, taking into account the federally enforceable rule limit of 0.551 pound

PE per hour under OAC rule 3745-17-11(B). Note PM10 emissions are a subset of PE.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

Federally Enforceable Permit to Install and Operate (FEPTIO) P0108065 for this emissions unit takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. The use of wet scrubbers with a minimum control efficiency of 90 percent (%) for VOC emissions; and

ii. Emissions of VOC from each emissions unit shall not exceed 2.08 TPY.

d. The emissions from each emissions unit shall be vented to the wet scrubbers at all times the emissions units are in operation.

e. The emissions of VOC from these emissions units shall not exceed 2.08 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions. 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 emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	0.17
1-2	0.35
1-3	0.52
1-4	0.69
1-5	0.87
1-6	1.04
1-7	1.21
1-8	1.39
1-9	1.56

1-10	1.73
1-11	1.91
1-12	2.08

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

Process restrictions are not necessary since the emission rate is based on 8760 hours of operation taking into account the 90% control efficiency of VOC emissions provided by the wet scrubbers.

f. The short-term VOC emission limit was established to reflect the potential to emit for this emissions unit. The short-term PE/PM10 emission limit was established from the Ohio SIP. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall calculate and maintain monthly records of the VOC emissions and the rolling 12-month emissions of VOC:

a. The total VOC emissions from all batch operations in Line Nos. 6, 7, & 8 pan dryers (each line with Dryers A and B), in tons per month, each [the summation of the VOC emissions from each batch during the month multiplied by (1 – CE/100) where CE equals the wet scrubbers VOC's Control Efficiency (CE), %]; and

b. The updated rolling, 12-month summation of the VOC emissions, in tons, for each line. This shall include the information from the current month and the preceding eleven calendar months.

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 VOC emissions for each calendar month from each line.

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubbers, that shall be maintained in order to demonstrate compliance, shall be between 0.8 to 5 pounds per square inch (gauge).

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubbers (in pounds per square inch, gauge during operation of these emissions units, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubbers on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the parameter deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, 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. A description of the corrective action;

b. The date the corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The pressure drop immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do 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 range for the pressure drop 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 permitted range for the pressure drop based upon information obtained during future

performance tests that demonstrate compliance with the allowable VOC emission rate for these emissions units. In addition, approved revisions to the range or limit 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.

(4) The permittee shall perform daily checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. The total duration of any visible emissions incident; and

e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. All exceedances of the rolling, 12-month emission limitation for VOC 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 VOC emission levels.

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, electronically through Ohio EPA Air Services, 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).

f) Testing Requirements

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

a. Emission Limitation:

Emissions of volatile organic compounds (VOC) from the pan dryers (Line Nos. 6, 7, & 8; each line with Dryers A& B) with wet scrubbers shall not exceed 11.4 pounds per day from each emissions unit.

Applicable Compliance Method:

If required, compliance with the short-term VOC emission limitation shall be demonstrated by calculating the daily uncontrolled VOC emissions, in pounds, from actual process data, including the alcohol content in the flavor mixture(s) and the alcohol content in the batch(es), and multiplying by the control efficiency of the wet scrubbers resulting in pounds of VOC per day, controlled.

The applicable emission limitation was established based on information supplied by the permittee in air application A0041726, May 2011, for FEPTIO P0108065:

114 pounds of VOC/day, uncontrolled x (1 – 0.90 CE) = 11.4 pounds of VOC per day.

b. Emission Limitation and BAT Exemption:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.048 ton per year (TPY) from each emissions unit.

Applicable Compliance Method:

Compliance with the annual PE/PM10 emission limitation shall be demonstrated by calculating the annual uncontrolled PE/PM10 emissions, in pounds, from actual process data for each emission point, including the amount of dry raw material charged to the HC Mix tank, multiplied by the 1.0 percent facility-supplied loss factor, and the amount of dry raw material charged to the pan dryers, multiplied by the 1.0 percent facility-supplied loss factor, and multiplying by the control efficiencies of the respective emission control devices, and dividing

by 2000 pounds per ton, resulting in TPY of PE/PM10 per year, per emission point, controlled.

The applicable emission limitation was established based on information supplied by the permittee in air application A0041726, May 2011, for FEPTIO P0108065:

4.80 pounds of PE/PM10/day, uncontrolled x (1 – 0.95 CE) x 365 days/yr x 1 Ton/2000 pounds = 0.044 TPY of PE/PM10 from film charge to HC Mix Tank; and

0.96 pound PE/PM10/day, uncontrolled x (1 – 0.75 CE) x (1 – 0.90 CE) x 365 days/yr x 1 Ton/2000 pounds = 0.004 TPY of PE/PM10 from silica charge to pan dryers.

0.044 TPY of PE/PM10 + 0.004 TPY of PE/PM10 = 0.048 TPY of PE/PM10.

The exemption from BAT was established based on the Allowable Rate of Particulate Emissions (E), for 0 < (P) < 0.05 (TPH)in Table I in the Appendix to OAC rule 3745-17-11:

0.551 pound of PE/PM10/hr x 24 hrs/day x 365 days/yr x 1 Ton/2000 pounds = 2.41 TPY of PE/PM10 from film charge to HC Mix Tank and silica charge to pan dryers.

c. Emission Limitation and Voluntary Restriction:

Emissions of VOC from the pan dryers (Line Nos. 6, 7, & 8; each line with Dryers A & B) with wet scrubbers shall not exceed 2.08 TPY from each emissions unit, based upon a rolling, 12-month summation of the VOC emissions.

Voluntary restriction: emissions of VOC from each emissions unit shall not exceed 2.08 TPY.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirement in d)(1). Compliance with the voluntary restriction will be demonstrated by compliance with the rolling, 12-month emission limitation.

The applicable emission limitation was established based on information supplied by the permittee in air application A0041726, May 2011, for FEPTIO P0108065:

114 pounds of VOC/day, uncontrolled x 365 days/year x (1 – 0.90 CE) x 1 Ton/2000 pounds = 2.08 TPY of VOC.

d. Emission Limitation:

Visible particulate emissions from the stacks serving each 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.

e. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.264 pound per day from each emissions unit.

PE from each emissions unit shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Compliance with the daily PE/PM10 emission limitation shall be demonstrated by calculating the daily uncontrolled PE/PM10 emissions, in pounds, from actual process data for each emission point, including the amount of dry raw material charged to the HC Mix tank, multiplied by the 1.0 percent facility-supplied loss factor, and the amount of dry raw material charged to the pan dryers, multiplied by the 1.0 percent facility-supplied loss factor, and multiplying by the control efficiencies of the respective emission control devices, resulting in pounds of PE/PM10 per day, per emission point, controlled.

The applicable emission limitation was established based on information supplied by the permittee in air application A0041726, May 2011, for FEPTIO P0108065:

4.80 pounds of PE/PM10/day, uncontrolled x (1 – 0.95 CE) = 0.240 pound of PE/PM10/day from film charge to HC Mix Tank; and

0.96 pound of PE/PM10/day, uncontrolled x (1 – 0.75 CE) x (1 – 0.90 CE) = 0.024 pound of PE/PM10/day from silica charge to pan dryers.

0.240 pound of PE/PM10/day + 0.024 pound of PE/PM10/day = 0.264 pound of PE/PM10/day.

If required, compliance with the hourly PE/PM10 emission limitation shall be demonstrated by Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established based on the allowable rate of particulate emissions (E), for $0 < (P) < 0.05$ (TPH)in Table I in the Appendix to OAC rule 3745-17-11:

0.551 pound PE/hr.

g) Miscellaneous Requirements

(1) None.