Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Firmenich, Inc.
4330 Drane Field Rd.
Lakeland, Florida 33811

Authorized Representative:
Mr. Don Hendrix, Vice President

Air Permit No. 1050409-008-AC
Permit Expires: 12/31/2014
Site Name : Lakeland Facility
Minor Air Construction Permit
Project Name: Construction of 32 Tanks

This is the final air construction permit which authorizes the construction of 32 tanks in the facility's Storage and Blending Tanks emissions unit (E.U. ID No. 001). This permit covers the installation of 25 citrus oil storage tanks, one 600 gallon propylene glycol storage tank and six process tanks (previously covered in Construction Permit 1050409-005-AC) ranging in size from 500 to 8000 gallons. This permit also adds a mixing operation to Emissions Unit No. 001, which is used to prepare customized, small batch mixes of citrus oils for specialty customers. The proposed work will be conducted at the Firmenich, Inc., Lakeland Facility (Standard Industrial Classification No. 2037). The facility is located in Polk County at 4330 Drane Field Rd. in Lakeland, Florida. The UTM coordinates are Zone 17, 393.2 km East, and 3097.1 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.
This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Don Hendrix, Firmenich, Inc. (Don.Hendrix@Firmenich.com)
Mr. Tom Pearson, Firmenich, Inc. (tom.pearson@Firmenich.com)
Ms. Robynn Andracsek, P.E., Burns & McDonnell (randracsek@burnsmcd.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY DESCRIPTION

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility designs and manufactures juice and beverage ingredients (flavors) derived from natural citrus products and ingredients for the juice and beverage industry. The facility includes a distillation building, a cooled tank farm building with a tanker loading area, and a blending and storage building which includes a quality control lab. The existing facility consists of the following emissions unit.

Facility ID No. 1050409	
ID No.	Emission Unit Description
001	Storage and Blending Tanks

Project Description and Affected Emission Units

This project is for the construction of 32 tanks in the facility's Storage and Blending Tanks emissions unit (E.U. ID No. 001). The project authorizes the installation of 25 citrus oil storage tanks which will consist of small tanks and totes ranging in size from 50 to 300 gallons; one 600 gallon propylene glycol storage tank; and six process tanks which will range in size from 500 to 8000 gallons. The six process tanks were previously covered in Construction Permit 1050409-005-AC and four of the six tanks have been constructed and incorporated into the facility's operation permit. When this project is complete, this emissions unit will include a total of 86 tanks. This project also adds a small mixing operation to Emissions Unit No. 001. The mixing operation is used to prepare customized, small batch mixes of citrus oils for specialty customers. The mixing takes place in portable pails or totes that are then used to send the product to customers. See "Appendix E – Tanks Summary" for a detailed summary of the tanks to be constructed.

The "Storage and Blending Tank" emissions unit allowable limits for volatile organic compounds (VOC) and hazardous air pollutants (HAP) will not be increased as a result of this project. This project will modify the following emissions units.

Facility ID No. 1050409	
ID No.	Emission Unit Description
001	Storage and Blending Tanks

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

This facility includes the following three exempt natural gas fired boilers:

- Colombia 35 hp boiler with a firing rate of 1.47 MMBTU/Hr,
- York-Shipley 250 hp boiler with a firing rate of 8.37 MMBTU/Hr, and
- Orr & Sembower Inc 150 hp boiler with a firing rate of 5.02 MMBTU/Hr.

These boilers are exempt from permitting pursuant to the "Categorical and Conditional Exemptions" of Rule 62-210.300(3)(a)34., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants VOC and Total HAP.

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 1050409-005-AC

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements; and
   e. Appendix E. Tank Summary.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance

with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit and at one year (365 day) intervals from the effective date of this permit for all new tanks added to E.U. No. 001 and commencing operation during the interval until all new tanks listed in Appendix E are in operation. Tanks that commenced operation within 45 days prior to an applicable one year submittal due date period may be included in the subsequent one year application submittal. See Appendix E for a list of new tanks to be added in E.U. No. 001. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

    a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

    b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

    c. copies of the most recent two months of records/logs specified in Specific Condition No. A.4.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050 and 62-4.220, F.A.C.]

A. EU No. 001 – Storage and Blending Tanks

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Storage and Blending Tanks: The existing emission unit consists of 58 tanks that are used to either store or blend organic liquids containing components such as ethanol and terpenes. After the completion of this project, this emissions unit will include a total of 86 tanks and a mixing operation used to prepare customized, small batch mixes of citrus oils (prepared in pails and totes) for specialty customers. Potential pollutants include VOC and HAP emissions which primarily result from working and breathing tank losses. Detailed summaries of these tanks are included in "Appendix E – Tanks Summary".

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.2. VOC Emissions Standard: The VOC emissions from this emissions unit (which includes all tanks and operations listed in "Appendix E – Tanks Summary") shall not exceed 37.0 tons per any consecutive 12 month period.
[Construction Permit 1050409-005-AC; Rule 62-210.200, F.A.C., Definitions - (Potential to Emit)]

A.3. Total HAP Emissions Standard: The Total HAP emissions from this emissions unit (which includes all tanks and operations listed in "Appendix E – Tanks Summary") shall not exceed 9.5 tons per any consecutive 12 month period.
[Construction Permit 1050409-005-AC; Rule 62-210.200, F.A.C., Definitions - (Potential to Emit)]

RECORDS AND REPORTS

A.4. VOC and HAP Emissions Recordkeeping: In order to document compliance with the VOC and HAP limitations of Specific Condition Nos. A.2 and A.3, the permittee shall maintain the following monthly records:

A. Facility Name, Facility ID No. (1050409), Month and Year;

B. The total VOC emissions for month (in tons);

C. The total HAP emissions for month (in tons).

D. The total VOC emissions for the most recent consecutive 12-month period (in tons);

E. The total HAP emissions for the most recent consecutive 12-month period (in tons).

Supporting calculations and data used to determine VOC and HAP emissions (e.g., material balance spreadsheet, calculations or Tanks Program Outputs) shall be available for review by the Department upon request. The supporting documentation shall include sufficient

information such as emission factors and throughputs to allow verification of the results. If VOC and HAP emission factors are derived from source other than AP-42, Chapter 7 or the Tanks Program (version 4.0.9d or higher), then the permittee shall submit the proposed emission factors along with emissions calculations to the Air Permitting Section of the Department's Southwest District Office for approval.

Monthly records shall be completed by the end of following month. All records required in this permit shall be maintained at the facility for a minimum of three years and made available to the Department upon request.

{Permitting Note: A copy of the emissions unit VOC/HAP emissions calculations spreadsheet (an excel spreadsheet used to calculate emissions) was submitted on 12/05/2011 as additional information. The spreadsheet contains detailed information about the dimensions and configurations of the emissions unit's existing storage and blending tanks. The spreadsheet also contains emissions calculations that are derived from AP-42, Chapter 7 – Liquid Storage Tanks. The permittee generates monthly emissions records by entering monthly individual tank throughput data into the spreadsheet. As new tanks are added, this spreadsheet must be updated (as needed on a monthly basis) to include all new tanks that have started operating. See the Tank Summary in Section 4, Appendix E.

[Rule 62-4.070(3) and 62-4.160(14)(b), F.A.C.]