



# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

October 13, 2015

## PERMITTEE

Mizkan Americas, Inc.  
1661 Feehanville, Suite 300  
Mount Prospect, IL 60056

Air Permit No. 1050418-007-AO  
Air Operation Permit

Authorized Representative:  
Mr. John Prahler, Director of Engineering

Lake Alfred Plant  
Polk County, Florida

## PROJECT

This is the final air operation permit, which authorizes the operation of the Lake Alfred Plant, which is a vinegar processing facility (Standard Industrial Classification No. 2084). This project revises air operation permit 1050418-006-AO to incorporate the addition of a 5<sup>th</sup> acetator for EU No. 002. The facility is located in Polk County at 445 N. Dakota Avenue in Lake Alfred, Florida. The UTM coordinates are Zone 17, 429.05 kilometers (km) East, and 3108.24 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

**Permitting Authority:** Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-470-5700.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, [Agency.Clerk@dep.state.fl.us](mailto:Agency.Clerk@dep.state.fl.us). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency

## FINAL AIR OPERATION PERMIT

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determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

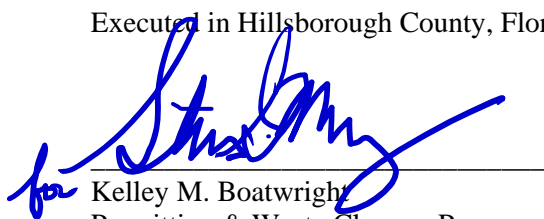
**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

1050418-007-AO Effective Date: October 13, 2015  
Renewal Application Due Date: November 29, 2017  
Expiration Date: January 28, 2019

Executed in Hillsborough County, Florida.



Kelley M. Boatwright  
Permitting & Waste Cleanup Program Administrator  
Southwest District

## FINAL AIR OPERATION PERMIT

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### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package 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 the date indicated below to the following persons.

Mr. John Prahler, Mizkan Americas, Inc.: ([john.prahler@mizkan.com](mailto:john.prahler@mizkan.com))

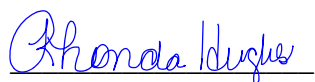
Mr. William Decker, P.E., Environmental Business Partners, LLC: ([bdecker@ebpartners.us](mailto:bdecker@ebpartners.us))

Ms. Shannon D. Camp, FDEP, Compliance Assurance Program: ([Shannon.D.Camp@dep.state.fl.us](mailto:Shannon.D.Camp@dep.state.fl.us))

Ms. Danielle D. Henry, FDEP, Compliance Assurance Program: ([Danielle.D.Henry@dep.state.fl.us](mailto:Danielle.D.Henry@dep.state.fl.us))

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)

October 13, 2015  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY DESCRIPTION

The existing Lake Alfred vinegar and wine processing facility operates five vinegar generation units and associated equipment under the ownership of Mizkan Americas, Inc. The existing facility consists of the following emissions units (EUs).

EU No.	Emission Unit Description
001	300 HP Clark Process Steam Boiler
002	Vinegar Generation Units (acetators)(5)

*{Permitting Note: This Lake Alfred facility also contains emission sources owned and operated by Imperial Brands, Inc. (dba Florida Distillery Company) permitted under facility ID 1050090. The total facility includes four (4) boilers (three owned by Imperial Brands, Inc. and one by Mizkan Americas, Inc.) distillery operations (Imperial Brand, Inc.) vinegar generation operations (Mizkan Americans, Inc.) and miscellaneous exempt emissions activities (both Imperial Brands, Inc. and Mizkan Americas, Inc.). Emissions Units 001 and 002 listed in this permit (i.e., the 300 HP Clark Boiler and vinegar generation units) were previously designated as Emission Units 004 and 006, respectively, under facility ID 1050090 when they were under the ownership of Imperial Brands, Inc./Florida Distillers Company.}*

### APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	001
40 CFR 60.48c(g)(1) and (2), NSPS Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	001
<i>State Rule Citations</i>	
Rule 62-4.070(3), F.A.C., Standards for Issuing or Denying Permits; Issuance; Denial	001 and 002
Rule 62-4.160(14)(b), F.A.C., Permit Conditions	001 and 002
Rule 62-204.800(8)(b), F.A.C., Federal Regulations Adopted by Reference	001
Rule 62-210.200, F.A.C., Definitions	001 and 002
Rule 62-210.650, F.A.C., Circumvention	002
Rule 62-296.406(1)(2) & (3), F.A.C., Fossil Fuel Steam Generators with Less Than 250 Million Btu per heat input, New and Existing Emissions Units	001
Rule 62-297.310(2) & (5)(b), (9) & (10), F.A.C., General Emissions Test Requirements	001

### Exempt Emission Sources/Activities

The following minor VOC emitting activities which are exempt from permitting in accordance with Rule 62-210.300(3)(b)(1) (Generic Emission Unit Exemption), F.A.C. on the basis that VOC emissions from these activities are below the exemption threshold level:

- (1) Vinegar Storage Tanks – nineteen (19) tanks of various storage capacities (from 2,000 to 30,000 gallons). (Estimated total potential to emit (PTE) of 1.36 TPY of VOC.)

## SECTION 1. GENERAL INFORMATION

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- (2) Vinegar Shipping Operations with VOC emissions resulting from filling of 55-gallon drums and tank trucks. (Estimated total PTE of 0.515 TPY of VOC).
- (3) Vinegar Bottling Operations
- (4) Vinegar Concentration Operations
- (5) Wine Fermentation
- (6) Wine Cutting/Blending
- (7) Wine Bottling
- (8) Wine Concentration Operations

The following four (4) standby emergency generators are exempt from permitting in accordance with the provisions of Rule 62-210.300(3)(a)35, F.A.C. (Stationary Reciprocating Internal Combustion Engines).

- (1) a 65-kw Detroit Diesel Allison standby emergency generator,
- (2) a 125-kw Caterpillar standby emergency generator
- (3) a 800-kw standby emergency generator, and
- (4) a 685-kw standby emergency generator.

40 CFR 63, Subpart ZZZZ Applicability Note: The engines 1 & 2 are subject to regulation under 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. These engines are located at an area source and meets the Subpart ZZZZ definition of “Existing stationary Rice”. Per Rule 62-210.300(3)(a)35.h., F.A.C., if these engines are stationary reciprocating internal combustion engine subject to 40 C.F.R. Part 63, Subpart ZZZZ, the owner or operator shall comply with all limitations and requirements of Subpart ZZZZ that apply to the engines.

40 CFR 60, Subpart IIII Applicability Note:

- a. NSPS 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) does not apply to the engines 1 & 2 based on their date of manufacture being before the applicability dates specified in Subpart IIII. These emergency generators are older units that have been located at this facility for an extensive period of time.
- b. The engines 3 & 4 are subject to regulation under 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines). These engines are located in an area source. Per Rule 62-210.300(3)(a)35.f., F.A.C., if these engines are stationary compression ignition internal combustion engines subject to 40 CFR Part 60, Subpart IIII, the owner or operator shall comply with all limitations and requirements of Subpart IIII that apply to the engines.

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is a synthetic non-Title V source for the pollutant VOC.

### PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Air Operation Permit No. 1050418-006-AO.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection  
Southwest District Office  
Air and Solid Waste Permitting Program  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-470-5700  
E-mail: [SWD\\_Air\\_Permitting@dep.state.fl.us](mailto:SWD_Air_Permitting@dep.state.fl.us)

All documents related to applications for permits to operate an emissions unit shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection  
Southwest District Office  
Compliance Assurance Program  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-470-5700  
E-mail: [SWD\\_Air@dep.state.fl.us](mailto:SWD_Air@dep.state.fl.us)

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above e-mail address and/or address.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); and Appendix E (300 HP Clark Boiler BACT Determination).
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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.  
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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7. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office. All synthetic non-Title V sources or all facilities with the potential to emit 10 tons/year or more of volatile organic compounds (VOC) shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.  
[Rule 62-210.370(3), F.A.C.]
8. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. To properly apply for an operation permit, the applicant shall submit the following:
- 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/>*);
  - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
  - copies of the most recent compliance test reports required by Specific Condition No. A.9., if not previously submitted (if applicable); and
  - copies of the most recent month of records/logs specified in Specific Condition No(s). A.10., B.5., B.6. and B.7.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. EU 001 – 300 HP Clark Process Steam Boiler

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	<u>300 HP Clark Process Steam Boiler:</u> This boiler is fired exclusively on natural gas at a maximum rated heat input rate of 12.55 MMBtu/hour (which corresponds to a natural gas fuel firing rate of approximately $12 \times 10^3$ cu. ft/hour). This boiler is subject to NSPS, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units).

#### FEDERAL REGULATIONS

- A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which is adopted by reference in Rule 62-204.800, F.A.C.  
[Rule 62-204.800(8), F.A.C.]

#### PERFORMANCE RESTRICTIONS

- A.2. Authorized Fuel: This boiler is permitted to fire natural gas only.  
[BACT Determination for particulate matter (PM) and sulfur dioxide (SO<sub>2</sub>) emissions made for this boiler in accordance with Rule 296.406(2) & (3), F.A.C.; Construction Permit 1050418-001-AC]
- A.3. Hours of Operation: The hours of operation of are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

- A.4. Visible Emissions Standard: Visible emissions from the boiler shall not exceed 20% opacity, except for one two-minute period per hour during which opacity shall not exceed 40%.  
[Rule 62-296.406(1), F.A.C.]

#### TESTING REQUIREMENTS

- A.5. Compliance Tests: The exhaust stack for the boiler shall be tested for visible emissions during the period between 180 and 105 days prior to the operation permit renewal application due date.  
[Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit 1050418-003-AC]
- A.6. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

The visible emissions compliance tests shall be conducted while operating the boiler at a high firing rate that is within 90-100% of the maximum rated heat input rate for this boiler.  
[Rule 62-297.310(2), F.A.C.; Construction Permit 1050418-003-AC]

- A.7. Test Method(s): Required tests shall be performed in accordance with the following reference method(s):

Method	Description of Method and Comments
DEP Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources. The visible emissions test shall be a minimum of 60 minutes in duration.

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. EU 001 – 300 HP Clark Process Steam Boiler

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.310(5)(b), F.A.C.; and Appendix A of 40 CFR 60]

### NOTIFICATION REQUIREMENTS

- A.8. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.  
[Rule 62-297.310(9), F.A.C.]

### RECORDS AND REPORTS

- A.9. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

The permittee shall submit a statement of the fuel being used and the estimated fuel heat input rate during the test period as a part of the compliance test report. Failure to submit the fuel type and heat input rate, or operating at conditions which do not reflect the normal operating conditions, may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-297.310(10), F.A.C.], Construction Permit 1050418-003-AC]

- A.10. Monthly Fuel Usage Records: Pursuant to 40 CFR 60.48c NSPS Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the permittee is required to maintain records of the amount of natural gas (or any other fuel) combusted in the boiler. In accordance with 40 CFR 60.48(g)(2), since this unit is permitted to combust natural gas only, records of the amount of each fuel burned during each calendar month shall be kept. An entry shall be made in the log no later than 21 days after the end of each calendar month. These records shall be recorded in a permanent form suitable for inspection onsite by the Department upon request, and shall be retained at the facility for at least a three (3) year period.

[Rules 62-4.160(14)(b) and 62-204.800(8)(b), F.A.C.; NSPS Subpart Dc – 40 CFR 60.48c(g)(1) and (2)]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. EU No. 002 – Vinegar Generation Units

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	<p><u>Vinegar Generation Units (acetators)(5):</u> This process oxidizes ethyl alcohol with a continuous stream of air to form acetic acid (vinegar). The vinegar is then filtered, stored and shipped.</p> <p>VOC emissions from three older acetators (Acetator 1, 2, and 3) are controlled by one medium efficiency (80%+) counter current packed bed wet scrubber (Scrubber No. 1) – a Heinrich Frings Inc. Model Type II, WV325-120 (with a design air flow capacity of 325 acfm).</p> <p>VOC emissions from the newer acetator (Acetator 4) are controlled by a second medium efficiency (80%+) counter current packed bed wet scrubber (Scrubber No. 2) – a Heinrich Frings Inc. Model Type I, WV177-120 (with a design air flow capacity of 177 acfm).</p> <p>The newest acetator (Acetator 5) has a Frings Aerator and a dedicated feedstock recovery scrubber (Scrubber No. 3).</p> <p>VOC emissions from the newest acetator (Acetator 5) are controlled by the high efficiency continuous water flow packed bed wet scrubber (Scrubber No. 3) – a Heinrich Frings Inc. Model (with a design air flow capacity of 295 cfm).</p>

#### PERFORMANCE RESTRICTIONS

- B.1. Permitted Capacity: The maximum combined production rate from the five (5) vinegar generation units (acetators) shall not exceed a total of 746,400 grain gallons per month\* (a grain gallon is one gallon of 10% acetic acid (vinegar) by volume).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit 1050418-005-AC]

*{\*VOC Potential to Emit (PTE) Note – VOC emissions are the primary air pollutant which results from operation of the vinegar generation units (acetators) and are controlled by the three scrubbers. The VOC emission rate is based upon the vinegar production rate and the airflow through the generation units and exhausted from the scrubber control devices (the VOC emission factor for these model acetators is 1.76 g/m<sup>3</sup> of air flow). Based upon the above operating hour and production rate limitations, and the maximum total design airflow from the three scrubbers (797 acfm), the maximum PTE for VOC from this emission unit is 23.6 tons per year.}*

- B.2. Circumvention of Air Pollution Control Equipment: With the exception of the operations allowed by Specific Condition No. A.3. titled “Operation During Scrubber Non-Routine Maintenance”, the permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control devices (i.e., wet scrubbers) operating properly. To ensure that the scrubbers are operating effectively, the ethanol content of the scrubber monitor liquid shall not exceed 0.8% ethanol during periods when a vinegar generation unit (acetator) controlled by that scrubber is in operation.

[Rules 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit 1050418-003-AC]

- B.3. Operation During Scrubber Non-Routine Maintenance: During periods of non-routine maintenance on this emissions unit’s three acetator VOC scrubbers, the five acetators (Acetator 1, 2, 3, 4, & 5) are permitted to operate as follows:

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### B. EU No. 002 – Vinegar Generation Units

- a. Acetators 1, 2 & 3: During periods of non-routine maintenance on the common VOC packed bed scrubber which Acetators 1, 2, and 3 all discharge through, each of the acetators may be operated for a maximum of 48 hours per any consecutive 12-month period.
- b. Acetator 4: During periods of non-routine maintenance on the VOC packed bed scrubber which Acetator 4 discharges through, Acetator 4 may be operated for a maximum of 48 hours per any consecutive 12-month period.
- c. Acetator 5: During periods of non-routine maintenance on the VOC packed bed scrubber which Acetator 5 discharges through, Acetator 5 may be operated for a maximum of 96 hours per any consecutive 12-month period.  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit 1050418-005-AC]

B.4. Restricted Operation: The hours of operation of are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

### RECORDS AND REPORTS

- B.5. Monthly Vinegar Production Records: To document compliance with Specific Condition No.B.1., the permittee shall maintain a most recent rolling 12-month average of record of the total monthly vinegar (acetic acid) production rate in terms of grain gallons per month (a grain gallon is one gallon of 10% acetic acid (vinegar) by volume. These records shall be completed within three business days and recorded in a permanent form suitable for inspection onsite by the Department upon request, and shall be retained at the facility for at least a three (3) year period.  
[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]
- B.6. Daily Scrubber Operating Parameter Records: To document compliance with Specific Condition No.B.2., the permittee shall maintain a daily log of scrubber monitor liquid ethanol content (in % ethanol). A reading shall be taken for each scrubber at a minimum once each day during which the vinegar generation unit(s) (acetators) controlled by that scrubber are in operation. These records shall be recorded in a permanent form suitable for inspection onsite by the Department upon request, and shall be retained at the facility for at least a three (3) year period.  
[Rule 62-4.070(3) and 62-4.160(14)(b), F.A.C.]
- B.7. Scrubber Non-Routine Maintenance Records: To document compliance with Specific Condition No.B.3., the permittee shall maintain the following records.
- a. Daily Records – For each day when Acetator 1, 2, 3, 4, or 5 is operated and its discharge scrubber is in non-routine maintenance mode, record:
    - 1. Date;
    - 2. Acetator Number (1, 2, 3, 4, or 5);
    - 3. Total hours of acetator operation for the day (while its discharge scrubber was in non-routine maintenance).
  - b. Monthly Records – For each month, record:
    - 1. Month and Year;
    - 2. Acetator Number (1, 2, 3, 4, and 5);

### **SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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#### **B. EU No. 002 – Vinegar Generation Units**

3. Total hours of operation each acetator (while its discharge scrubber was in non-routine maintenance), for the month;
4. Total hours of operation each acetator (while its discharge scrubber was in non-routine maintenance), for the most recent consecutive 12-month period.

Daily records shall be completed within three business days. Monthly records shall be completed no later than 21 days after the end of the month. These records shall be recorded in a permanent form suitable for inspection onsite by the Department upon request, and shall be retained at the facility for at least a three (3) year period.

[Rule 62-4.070(3) and 62-4.160(14)(b), F.A.C.; Construction Permit 1050418-003-AC]