



OCT 19 2011

Chris Kaji
Sensient Dehydrated Flavors LLC
PO Box 485
Livingston, CA 95334

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1657
Project # N-1110270**

Dear Mr. Kaji:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct N-1657-36-0 and N-1657-36-1 into the Title V operating permit. For Authority to Construct N-1657-36-0, Sensient Dehydrated Flavors LLC proposed to install a new vegetable finishing line served by a baghouse. For Authority to Construct N-1657-36-1, the facility proposed to modify the vegetable finishing line by adding a second baghouse for better control of particulate matter emissions.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct N-1657-36-0 and N-1657-36-1, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



OCT 19 2011

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-1657
Project # N-1110270

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Sensient Dehydrated Flavors LLC is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct N-1657-36-0 and N-1657-36-1 into the Title V operating permit. For Authority to Construct N-1657-36-0, Sensient Dehydrated Flavors LLC proposed to install a new vegetable finishing line served by a baghouse. For Authority to Construct N-1657-36-1, the facility proposed to modify the vegetable finishing line by adding a second baghouse for better control of particulate matter emissions.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct N-1657-36-0 and N-1657-36-1, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1110270

Engineer: James Harader
Date: May 17, 2011

Facility Number: N-1657
Facility Name: Sensient Dehydrated Flavors LLC
Mailing Address: PO Box 485
Livingston, CA 95334

Contact Name: Chris Kaji
Phone: (209) 656-5826

Responsible Official: Joseph Martins
Title: Director of Operations

I. PROPOSAL

Sensient Dehydrated Flavors LLC is proposing a Title V minor permit modification to incorporate Authorities to Construct N-1657-36-0 and N-1657-36-1 into the existing Title V operating permit. Authority to Construct N-1657-36-0 allows for the installation of a new vegetable finishing line served by a baghouse, while, Authority to Construct N-1657-36-1 modifies the new vegetable finishing line by adding a second baghouse for better control of PM₁₀ emissions. This proposal results in an increase in emissions of 0.5 lb-PM₁₀/day. Per District policy, an increase in emissions equal to or less than 0.5 lb/day is rounded to zero for NSR determinations.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 9984 W. Walnut Ave in Livingston, CA.

III. EQUIPMENT DESCRIPTION

N-1657-36-3: VEGETABLE PROCESSING OPERATION INCLUDING A SCREEN CLEANING AREA, VEGETABLE CONVEYING, CLASSIFICATION, MILLING, SCREENING, AND PACKAGING UNITS ALL SERVED BY A MAC MODEL 144LVS-100-3 BAGHOUSE AND A DONALDSON 162MBT10 BAGHOUSE

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

N-1657-36-0 and -36-1

As stated earlier, ATC 36-0 authorizes the installation of a vegetable finishing line, while ATC 36-1 modifies that vegetable finishing line by adding a second baghouse for better control of PM₁₀ emissions.

This is a new permit unit; therefore, all the conditions are being added to the TV permit. The following table shows the ATC conditions that have not been added to the TV permit.

ATC Conditions that were not Added to the TV Permit		
ATC 36-0 Condition #	ATC 36-1 Condition #	Proposed Changes to Conditions
1	1	This condition requires the applicant to submit a Minor Modification application prior to operating the unit. This requirement has been satisfied.
2	5	This requirement is already listed on the Facility-wide permit.
4	4	This requirement is already listed on the Facility-wide permit.
N/A	2	This condition required ATC 36-0 to be implemented prior to or concurrently with ATC 36-1. This requirement has been satisfied.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or Conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and Conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit N-1657-36-3
- B. Authorities to Construct N-1657-36-0 and N-1657-36-1
- C. Title V Compliance Certification Form

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-1657-36-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1657-36-3

EXPIRATION DATE 09/30/2015

EQUIPMENT DESCRIPTION:

VEGETABLE PROCESSING OPERATION INCLUDING A SCREEN CLEANING AREA, VEGETABLE CONVEYING, CLASSIFICATION, MILLING, SCREENING, AND PACKAGING UNITS ALL SERVED BY A MAC MODEL 144LVS-100-3 BAGHOUSE AND A DONALDSON 162MBT10 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
3. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency for each baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of dehydrated vegetable products processed shall not exceed 120 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.004 lb/ton of dehydrated vegetable product processed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The Donaldson baghouse shall operate at all times with a differential pressure equal to or greater than 0.25 inches water column, and less than or equal to 10 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The MAC baghouse shall operate at all times with a differential pressure equal to or greater than 0.25 inches water column, and less than or equal to 10 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
12. For each baghouse, the differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall keep a daily record of the quantity of dehydrated vegetable product processed. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Records of all maintenance of each baghouse, including all change out outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of the daily differential operating pressure readings for each baghouse shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records required by this permit shall be retained on-site for a period of at least five years, and shall be made available for inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

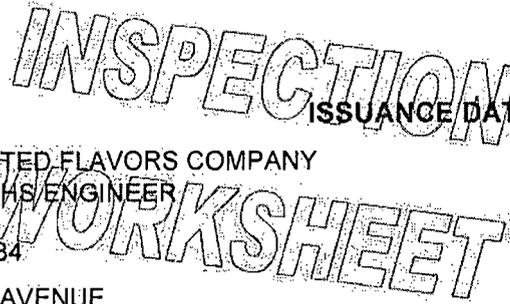
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: SENSIENT DEHYDRATED FLAVORS COMPANY
Location: 9984 WEST WALNUT AVENUE, LIVINGSTON, CA 95334
N-1657-36-3; Apr 13 2011 3:25PM -- HARADERJ

DRAFT

ATTACHMENT B

**Authorities to Construct
N-1657-36-1 and N-1657-36-0**



LEGAL OWNER OR OPERATOR: SENSIENT DEHYDRATED FLAVORS COMPANY
MAILING ADDRESS: ATTN: CHRIS KAJI, EHS ENGINEER
 PO BOX 485
 LIVINGSTON, CA 95334

LOCATION: 9984 WEST WALNUT AVENUE
 LIVINGSTON, CA 95334

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:

MODIFICATION OF VEGETABLE OPERATION SERVED BY A BAGHOUSE TO ADD A DONALDSON 162MBT10 BAGHOUSE SUCH THAT THE POST-PROJECT EQUIPMENT DESCRIPTION IS: VEGETABLE PROCESSING OPERATION INCLUDING A SCREEN CLEANING AREA, VEGETABLE CONVEYING, CLASSIFICATION, MILLING, SCREENING, AND PACKAGING UNITS ALL SERVED BY A MAC MODEL 144LVS-100-3 BAGHOUSE AND A DONALDSON 162MBT10 BAGHOUSE

CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct N-1657-36-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
6. Visible emissions from the exhaust of each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
7. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
8. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency for each baghouse. [District Rule 2201]
9. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
10. {3459} Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201]
11. The quantity of dehydrated vegetable products processed shall not exceed 120 tons in any one day. [District Rule 2201]
12. PM10 emissions shall not exceed 0.004 lb/ton of dehydrated vegetable product processed. [District Rule 2201]
13. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
14. For the Donaldson baghouse, the differential pressure gauge reading range shall be established at the time of the startup inspection. [District Rule 2201]

CONDITIONS FOR APPLICATION N-1657-36-1

- INSPECTION WORKSHEET**
15. The MAC baghouse shall operate at all times with a differential pressure equal to or greater than 0.25 inches water column, and less than or equal to 10 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
 16. For each baghouse, the differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
 17. The permittee shall keep a daily record of the quantity of dehydrated vegetable product processed. [District Rule 2201]
 18. Records of all maintenance of each baghouse, including all change out outs of filter media, shall be maintained. [District Rule 2201]
 19. Records of the daily differential operating pressure readings for each baghouse shall be retained on-site. [District Rule 2201]
 20. All records required by this permit shall be retained on-site for a period of at least five years, and shall be made available for inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

INSPECTION
ISSUANCE DATE: 04/30/2010
WORKSHEET

LEGAL OWNER OR OPERATOR: SENSIENT DEHYDRATED FLAVORS COMPANY
MAILING ADDRESS: ATTN: CHRIS KAJI, EHS ENGINEER
 PO BOX 485
 LIVINGSTON, CA 95334

LOCATION: 9984 WEST WALNUT AVENUE
 LIVINGSTON, CA 95334

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:
 VEGETABLE CLASSIFICATION, MILLING, SCREENING AND PACKAGING LINES INCLUDING CONVEYANCE EQUIPMENT; ALL SERVED BY A MAC MODEL 144LVS-100-3 BAGHOUSE WITH PULSE JET CLEANING METHOD

CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Visible emissions from dust collector serving this operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
6. The maximum quantity of dehydrated products processed through this milling operation shall not exceed 120 tons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The PM10 emission concentration shall not exceed 0.004 lbs/ton of product processed through this milling operation. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
10. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
11. {3458} Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]
12. Baghouse shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202]
14. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags or filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
15. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201]
16. The baghouse pressure drop shall be observed and recorded quarterly during operation of this unit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

- INSPECTION WORKSHEET
17. Records of baghouse maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
 18. Records of daily tonnage of material processed in the vegetable milling and packaging operation shall be maintained. [District Rule 2201]
 19. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
 20. {3465} Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201]

ATTACHMENT C

Title V Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: SENSIENT DEHYDRATED FLAVORS LLC	FACILITY ID: N-1657
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Sensient Dehydrated Flavors LLC	
3. Agent to the Owner: Chris Kaji	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

Joseph E. Martins
Signature of Responsible Official:

2-3-2011
Date

Joseph Martins

Name of Responsible Official (please print)

Director of Operations

Title of Responsible Official (please print)