



SEP 24 2013

Mr. Chris Kaji  
Sensient Natural Ingredients LLC  
P.O. Box 279  
Cressey, CA 95312

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # N-1657**  
**Project # N-1132524**

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 N-1657-37-0 and N-1657-38-0 into the Title V operating permit. This modification is to incorporate two new centralized vacuum units into the Title V operating permit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1657-37-0 and N-1657-38-0, application, and emission increases. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner  
Director of Permit Services

DW:WMS/st

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**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

## **Title V APPLICATION REVIEW Minor Modification**

**Date:** August 21, 2013  
**Facility Number:** N-1657  
**Facility Name:** Sensient Natural Ingredients LLC  
**Mailing Address:** P.O. Box 279  
Cressey, CA 95312

**Contact Name:** Chris Kaji  
**Phone:** (209) 656 – 5826

**Responsible Official:** Joseph Martins  
**Title:** Director of Operations

**Processing Staff:** Wai-Man So  
**Project Number:** N-1132524

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### **I. PROPOSAL**

Sensient Natural Ingredients LLC (hereinafter Sensient) has proposed to incorporate two new centralized vacuum units, permitted under Authorities to Construct (ATC) N-1657-37-0 and N-1657-38-0, into the Title V operating permit.

The purpose of this document 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 West Walnut Avenue in Livingston, California.

### **III. EQUIPMENT DESCRIPTION**

#### **N-1657-37-0**

GENERAL HOUSEKEEPING CENTRALIZED VACUUM CLEANING UNIT #1 SERVED BY A 500 CFM DUROVAC MODEL QLP32-536 FILTRATION SYSTEM EQUIPPED WITH A FILTER SEPARATOR (WITH FIVE POLYPRO PTFE FILTERS), AND A DUROVAC MODEL A350-320 IN-LINE FILTER

#### **N-1657-38-0**

GENERAL HOUSEKEEPING CENTRALIZED VACUUM CLEANING UNIT #2 SERVED BY A 500 CFM DUROVAC MODEL QLP32-536 FILTRATION SYSTEM EQUIPPED

WITH A FILTER SEPARATOR (WITH FIVE POLYPRO PTFE FILTERS), AND A DUROVAC MODEL A350-320 IN-LINE FILTER

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

The proposed project is a Minor Modification to the Title V permit. Therefore, public review is not required.

#### **V. APPLICABLE REQUIREMENTS**

District Rule 2520 Federally Mandated Operating Permits (06/21/01)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

Sensient is proposing to incorporate Authorities to Construct (ATC) N-1657-37-0 and N-1657-38-0 into the Title V operating permit. Sensient has received these ATCs to install two centralized vacuum units for housekeeping new purpose. Copies of these ATCs are enclosed in Appendix II of this document.

#### **Changes to each of the ATCs N-1657-37-0 and N-1657-38-0:**

1. Condition # 1 states, "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]".

The applicant has submitted the application to modify the Title V permit on July 9, 2013. Therefore, the condition listed above has been removed from the permit.

2. Condition # 2 states, "No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]".

This condition is listed on the facility-wide permit N-1657-0-2 under condition # 42. Therefore, this condition has been removed from the permit.

3. Condition # 4 states, "No air contaminant shall be discharged into the atmosphere for 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]".

This condition is listed on the facility-wide permit N-1657-0-2 under condition # 22. Therefore, this condition has been removed from the permit.

4. Condition # 11 states, "When in operation, the differential pressure of the dust collector shall not be less than 0 inches water column nor greater than 20 inches water column. [District Rule 2201]".

Per applicant, the original proposed parameter was the scale of the differential pressure gauge itself, and the actual operating parameter has been established and verified during operation. Therefore, the condition listed above has been revised. The revised condition is listed as follows:

"When in operation, the differential pressure of the dust collector shall not be less than 0 inches water column nor greater than 15 inches water column. [District Rule 2201]"

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, the proposed project 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 (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); 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 (Appendix III).

Compliance is expected with this Rule.

### **APPENDICES**

Appendix I: Proposed Modified Title V Operating Permits No. N-1657-37-1 and N-1657-38-1

Appendix II: Authorities to Construct N-1657-37-0 and N-1657-38-0

Appendix III: Permit Application

Appendix IV: Emissions Change

## Appendix I

Proposed Modified Title V Operating Permits No. N-1657-37-1  
and N-1657-38-1

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1657-37-1

EXPIRATION DATE: 09/30/2015

## EQUIPMENT DESCRIPTION:

GENERAL HOUSEKEEPING CENTRALIZED VACUUM CLEANING UNIT #1 SERVED BY A 500 CFM DUROVAC MODEL QLP32-536 FILTRATION SYSTEM EQUIPPED WITH A FILTER SEPARATOR (WITH FIVE POLYPRO PTFE FILTERS), AND A DUROVAC MODEL A350-320 IN-LINE FILTER

## PERMIT UNIT REQUIREMENTS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. Visible emissions from the exhaust of the filtration system serving the centralized vacuum cleaning unit shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All ducting and emissions control equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The filtration system shall be maintained and operated according to manufacturer's specifications. The cleaning frequency and duration of the filtration system shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Material removed from the filtration system shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The filtration system shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags, and 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
8. When in operation, the differential pressure of the filtration system shall not be less than 0 inches water column nor greater than 15 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions from the filtration system serving the centralized vacuum cleaning unit shall not exceed 0.0004 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure of the filtration system shall be monitored and recorded on each day that it operates. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of all maintenance of the filtration system, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
12. All records shall be retained on-site for a period of at least five years and be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1657-38-1

EXPIRATION DATE: 09/30/2015

## EQUIPMENT DESCRIPTION:

GENERAL HOUSEKEEPING CENTRALIZED VACUUM CLEANING UNIT #2 SERVED BY A 500 CFM DUROVAC MODEL QLP32-536 FILTRATION SYSTEM EQUIPPED WITH A FILTER SEPARATOR (WITH FIVE POLYPRO PTFE FILTERS), AND A DUROVAC MODEL A350-320 IN-LINE FILTER

## PERMIT UNIT REQUIREMENTS

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1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. Visible emissions from the exhaust of the filtration system serving the centralized vacuum cleaning unit shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All ducting and emissions control equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The filtration system shall be maintained and operated according to manufacturer's specifications. The cleaning frequency and duration of the filtration system shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
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8. When in operation, the differential pressure of the filtration system shall not be less than 0 inches water column nor greater than 15 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. PM10 emissions from the filtration system serving the centralized vacuum cleaning unit shall not exceed 0.0004 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
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These terms and conditions are part of the Facility-wide Permit to Operate.

## **Appendix II**

### **Authorities to Construct N-1657-37-0 and N-1657-38-0**



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

  
**HEALTHY AIR LIVING™**

**COPY**

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1657-37-0

**ISSUANCE DATE:** 02/12/2013

**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

**EQUIPMENT DESCRIPTION:**

GENERAL HOUSEKEEPING CENTRALIZED VACUUM CLEANING UNIT #1 SERVED BY A 500 CFM DUROVAC MODEL QLP32-536 FILTRATION SYSTEM EQUIPPED WITH A FILTER SEPARATOR (WITH FIVE POLYPRO PTFE FILTERS), AND A DUROVAC MODEL A350-320 IN-LINE FILTER

### CONDITIONS

1. 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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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]
5. Visible emissions from the exhaust of the filtration system serving the centralized vacuum cleaning unit shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. All ducting and emissions control equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
7. The filtration system shall be maintained and operated according to manufacturer's specifications. The cleaning frequency and duration of the filtration system shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services

N-1657-37-0; Feb 12 2013 7:32AM - SCW : Joint Inspection NOT Required

9. Material removed from the filtration system shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
10. The filtration system shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags, and the gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**  
**COPY**

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1657-38-0

**ISSUANCE DATE:** 02/12/2013

**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

**EQUIPMENT DESCRIPTION:**  
GENERAL HOUSEKEEPING CENTRALIZED VACUUM CLEANING UNIT #2 SERVED BY A 500 CFM DUROVAC MODEL QLP32-536 FILTRATION SYSTEM EQUIPPED WITH A FILTER SEPARATOR (WITH FIVE POLYPRO PTFE FILTERS), AND A DUROVAC MODEL A350-320 IN-LINE FILTER

## CONDITIONS

1. 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
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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1657-38-0 : Feb 12 2013 7:35AM - SOV : Joint Inspection NOT Required

9. Material removed from the filtration system shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
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13. Differential operating pressure of the filtration system shall be monitored and recorded on each day that it operates. [District Rule 2201]
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15. All records shall be retained on-site for a period of at least five years and be made available for District inspection upon request. [District Rule 2201]

## **Appendix III**

### **Permit Application**

# San Joaquin Valley Air Pollution Control District

[www.valleyair.org](http://www.valleyair.org)

## Permit Application For:

ADMINISTRATIVE AMENDMENT    
  MINOR MODIFICATION    
  SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>Sensient Natural Ingredients LLC</b>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <b>PO 279</b>	
CITY: <b>Cressey</b>	STATE: <b>CA</b> 9-DIGIT ZIP CODE: <b>95312</b>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	INSTALLATION DATE:
STREET: <b>9984 W. Walnut</b> CITY: <b>Livingston</b>	<b>7/8/2013</b>
_____ % SECTION     _____ TOWNSHIP     _____ RANGE	
4. GENERAL NATURE OF BUSINESS: <b>Food Processing</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
Application to implement ATC's N-1657-38-0 & N-1657-37-0	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Chris Kaji</b>	TITLE OF APPLICANT: <b>EHS Engineer</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>7/8/2013</b>
	PHONE:     (209) 656-5826 FAX:     (     ) EMAIL:

*For APCD Use Only:*

<p style="text-align: center; font-weight: bold; font-size: 1.2em;">RECEIVED</p> <p>DATE STAMP</p> <p style="text-align: center; font-size: 1.2em;">JUL 09 2013</p> <p style="text-align: center;">SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED:     \$     <b>0</b>     CHECK#:     _____</p> <p>DATE PAID:     _____</p> <p>PROJECT NO:     <b>N1132524</b>     FACILITY ID:     <b>N-1657</b></p>
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Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

RECEIVED

JUL 09 2013

SJVAPCD  
NORTHERN REGION

**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
- MINOR PERMIT MODIFICATION
- ADMINISTRATIVE AMENDMENT

COMPANY NAME: Sensient Natural Ingredients 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 Technologies Corporation	
3. Agent to the Owner: Joeseph Martins	

**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 forgoing is correct and true:

Joseph Martins  
Signature of Responsible Official

7/8/2013  
Date

Joseph Martins  
Name of Responsible Official (please print)

Director of Operations  
Title of Responsible Official (please print)

## Appendix IV

### Emissions Change

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-1657-37-1	0	0	0	0	15
N-1657-38-1	0	0	0	0	15
<b>TOTAL:</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>30</b>