### New Jersey Department of Environmental Protection Reason for Application

#### **Permit Being Modified**

#### Permit Class: PCP Number: 190007

**Description** of Modifications: Currently, the Habanolide process consists of E8506 (V-570) and E8527 (V-57A0) which run in parallel and each peforms a peroxide reaction followed by decantation. This process is identified in the permit as OS32. After decantation, the Habanolide feed material is transferred to E507 (V-580) for the next step in the process.

Firmenich is requesting to modify the process flow such that E8506 (V-570) and E8527 (V57A0) will perform the peroxide reaction, but the decantation step will ocur in a new vessel V-57B0. The displaced vapor in the headspace of V-57B0 will be recovered in whichever vessel (either V-570 or V-57A0) is actively transferring to V57B0 at the time. Emisions will continue to exhaust to the Pad 5 combined vent header which runs through a vapor condensor prior to discharging to atmosphere. The P&ID for the new configuration is attached.

The throughput of Habanolide will increase from 3,250 MT/yr to 3,850 MT/yr which is an increase of approximately 18.5% and is due to total batches increasing from 5.4 batches/day to 6.5 batches/day. The overall VOC emissions will be conservatively increased by 20% to address the additonal number of batches that can be made each year. There are no changes being made to the raw materials.

A description in the equipment details for V-57A0 was found to be incorrect and was updated as part of this application. No other changes are being requested at this time.

Facility Name (AIMS): Firmenich Incorporated

Street FIRMENICH INCORPORATED Address: 150 FIRMENICH WAY PORT NEWARK, NJ 07114

Mailing FIRMENICH INCORPORATED Address: 150 FIRMENICH WAY PORT NEWARK, NJ 07114

#### Facility ID (AIMS): 06242

State Plane Coordinates:										
X-Coordinate:	595,035									
Y-Coordinate:	679,401									
Units:	New Jersey State Plane {									
Datum:	NAD83									
Source Org .										
Source Org	DEP-Program									

County:EssexLocationEast of Doremus AvenueDescription:North of Turnpike Extension

Industry:

Primary SIC:	2869
Secondary SIC:	
NAICS:	325199

Contact Type: Air Permit Information Contact		
Organization: Firmenich Incorporated		Org. Type: Corporation
Name: Michael Damato		<b>NJ EIN:</b> 16335900001
Title: Sr. Health Safety & Environmental Manage		
<b>Phone:</b> (973) 274-6638 x	Mailing	Firmenich Incorporated
<b>Fax:</b> () - x	Address:	150 Firmenich Way
<b>Other:</b> (973) 590-1830 x		Folt newalk, INJ 0/114
Туре:		
Email: michael.damato@firmenich.com		
Contact Type: Consultant		
Organization: GZA GeoEnvironmental Inc.		Org. Type: Corporation
Name: Bhuvnesh J Parekh		NJ EIN:
Title: Senior Consultant		
<b>Phone:</b> (973) 774-3323 x	Mailing	55 Lane Road, Suite 407
<b>Fax:</b> () - x	Address:	Fairfield, NJ 07004
<b>Other:</b> (862) 200-1790 x		
Type: Mobile		
Email: Bhuvnesh.Parekh@gza.com		
Contact Type: Emission Statements		
Organization: Firmenich Incorporated		Org. Type: Corporation
Name: Michael Damato		<b>NJ EIN:</b> 16335900001
Title: Sr. Health Safety & Environmental Manage		
<b>Phone:</b> (973) 274-6638 x	Mailing	Firmenich Incorporated
Fax: () - x	Address:	150 Firmenich Way

Port Newark, NJ 07114

Email: michael.damato@firmenich.com

**Fax:** () - x

Type:

**Other:** (973) 590-1830 x

Page 2 of 3

#### **Contact Type: Fees/Billing Contact**

Organization: Firmenich Incorporated		Org. Type:	Corporation
Name: Michael Damato		NJ EIN:	16335900001
Title: Sr. Health Safety & Environmental Manage			
<b>Phone:</b> (973) 274-6638 x	Mailing	Firmenich I	ncorporated
Fax: () - x	Address:	150 Firmen Port Newarl	ich Way k NI 07114
<b>Other:</b> (973) 590-1830 x		I oft Newall	x, 113 0/11-
Туре:			
Email: michael.damato@firmenich.com			

### Contact Type: Responsible Official

Organization: Firmenich Incorporated Name: Ronald Kurtz Title: QHS&E Director Phone: (973) 589-3443 x Fax: () - x Other: () - x Type: Email: Ron.Kurtz@Firmenich.com

Org. Type:	Corporation
NJ EIN:	16335900001

Mailing	Firmenich Incorporated					
Address:	150 Firmenich Way					
	Port Newark, NJ 07114					

## New Jersey Department of Environmental Protection Equipment Inventory

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand- Fathered	Last Mod. (Since 1968)	Equip. Set ID
E8506	V-570	4000-Gallon Batch Reaction Vessel and Associated Equipment	Manufacturing and Materials Handling Equipment			No		ES11
E8507	V-580	800 gallon batch reaction vessel	Manufacturing and Materials Handling Equipment			No		ES12 ES13
E8522	T-580	1200 gallon feed tank for batch reaction vessel V-580	Manufacturing and Materials Handling Equipment     No       Manufacturing and Materials Handling Equipment     No			ES13		
E8523	T-582	250 gallon receiver tank for batch reaction vessel V-580 Equipment	Manufacturing and Materials Handling Equipment			No		ES12
E8527	V-57A0	4000 gallon batch reaction vesselequiptment	Image: Annufacturing and Materials Handling     Image: Annufacturing and Materials Handling		No		ES11	
E8528	E-580		Manufacturing and Materials Handling Equipment			No		ES12
E8534	T-557	T-557 NBA Receiver / Feed Tank	Manufacturing and Materials Handling Equipment			No		ES10
E8535	C-5711	C-5711 NBA Wash Column	Manufacturing and Materials Handling Equipment			ES10		
E8536	T-5711	T-5711 Washed NBA Receiver Tank	Manufacturing and Materials Handling Equipment			No		ES10

## New Jersey Department of Environmental Protection Equipment Inventory

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand- Fathered	Last Mod. (Since 1968)	Equip. Set ID
E8537	T-57A8	T-57A8 Washing NBA Feed Tank	Manufacturing and Materials Handling Equipment			No		ES10
E8539	T-551R	T-551R Mixing Tank	Manufacturing and Materials Handling Equipment			No		
E8540	V-57B0	4000 gallon Holding vessel	Manufacturing and Materials Handling Equipment			No		

### New Jersey Department of Environmental Protection Control Device Inventory

CD NJID	Facility's Designation	Description	СД Туре	Install Date	Grand- Fathered	Last Mod. (Since 1968)	CD Set ID
CD8502	C-50A5	Emergency Release Scrubber	Other				
CD8503	C-50A6	Emergency Release Scrubber	Other				
CD8504	Pad5Condense	Pad 5 Vent Header Condensers	Condenser				
CD8505	E-570	V-570 Condenser	Condenser				CS1
CD8506	E-57A0	V-57A0 Condenser	Condenser				CS1

## New Jersey Department of Environmental Protection Emission Points Inventory

PT NUD	Facility's	Facility'sDescriptionConfig.Equiv.HeightDist.DisinguitienDiscussionDiscussionDiscussionDiscussionDiscussion		Dist. to	Exhaust Temp. (deg. F)			Exhaust Vol. (acfm)			Discharge	PT Sot ID		
	Designation			(in.)	(11.)	Line (ft)	Avg.	Min.	Max.	Avg.	Min.	Max.	Direction	Set ID
PT8501	C-50A6	Pad 5 Vent Header												
PT8502	C-50A5	C-50A5 Vent Column												
PT8505	Pad5Exhaust	Pad 5 Exhaust Fan												

## New Jersey Department of Environmental Protection Emission Unit/Batch Process Inventory

### **BP85**

### **OS32**

Batch Process Operating Scenario Run Time (hours)			Min. Calc. Time: 15.3 Max. Calc. Time: 28.0 M			Min. User Time:			Max. User					
Step NJID	Facility's Designation	Step Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Step Time I Min.	Run Hours Max.	VOC Range	Flov (acfi Min.	v m) Max.	Teı (de Min.	np. g F) Max.
ST1	Charging	Batch Reactor Fill	Normal - Steady State	ES11	CD8502 (S) CS1 (P)	PT8502	3-01-091-99	3.0	4.0	В	0.0	10.0	32.0	95.0
ST2	Mix	Mix Batch	Normal - Steady State	ES11			3-01-091-99	4.0	6.0		0.0	1.0	32.0	95.0
ST3	Heat	Adjust temperature	Normal - Steady State	ES11	CD8502 (S) CS1 (P)	PT8502	3-01-091-99	0.5	1.0	D	0.0	5.0	32.0	140.0
ST4	Transfer	Transfer batch contents between vessels	Normal - Steady State	E8540	CD8502 (S) CS1 (P)	PT8502	3-01-091-99	0.5	1.0	В	0.0	10.0	104.0	140.0
ST5	Reheat	Reaheating of the reactor	Normal - Steady State	E8540	CD8503 (S) CD8504 (P)	PT8501	3-01-091-99	0.5	1.0	В	0.0	5.0	86.0	140.0
ST6	Charging	Batch Reactor Fill	Normal - Steady State	E8507	CD8503 (S) CD8504 (P)	PT8501	3-01-091-99	0.5	1.0	В	0.0	3.5	68.0	86.0
ST7	Feed	Transfer batch contents between vessels with heat and vacuum	Normal - Steady State	ES12	CD8503 (S) CD8504 (P)	PT8501	3-01-091-99	1.5	2.5	D	0.0	3.5	122.0	266.0
ST8	Heat	Adjust temperature	Normal - Steady State	ES12	CD8502 (P)	PT8502	3-01-091-99	0.5	1.0	D	0.0	5.0	68.0	250.0
ST9	Charging	Batch Reactor Fill	Normal - Steady State	ES13	CD8502 (P)	PT8502	3-01-091-99	0.5	1.0	D	0.0	10.0	68.0	86.0
ST10	Charging	Material Handling Tank	Normal - Steady State	ES10			3-01-091-99	1.5	2.5	D	0.0	10.0	86.0	140.0
ST11	Discharge	Withdraw product to storage tank	Normal - Steady State	E8507				0.3	1.0	В	0.0	3.5	100.0	160.0
ST12	Charging/Mix	Charging and mixing in the mixing tank	Normal - Steady State	E8539				2.0	6.0	D	0.0	10.0	32.0	150.0

Date: 6/30/2023

## New Jersey Department of Environmental Protection Emission Unit/Batch Process Inventory

U 1

UOS	Facility's	UOS	Operation	Signif.	Control	Emission	SCC(s) 0	Annual Oper. Hours VOC	Flow (acfm)	Temp. (deg F)
NJID	Designation	Description	Туре	Equip.	Device(s)	Point(s)	SCC(\$)	Min. Max. Range M	Iin. Max.	Min. Max.

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario:** OS0 Summary

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		8.52000000	5.60400000	5.60400000	tons/yr	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		36.80100000	1.70000000	1.70000000	lb/batch	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST1 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.08200000	0.00400000	0.00400000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

ST2 Mix

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.00000000		0.00000000	lb/step	No

06242 Firmenich Incorporated

#### Date: 6/30/2023

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST3 Heat

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		2.67000000	0.13400000	0.13400000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST4 Transfer

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.16000000	0.00800000	0.00800000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST5 Reheat

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.16000000	0.00800000	0.00800000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step:

ST6 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.05320000	0.00300000	0.00300000	lb/step	No

06242 Firmenich Incorporated

#### Date: 6/30/2023

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST7 Feed

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.47300000	0.31600000	0.31600000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

ST8 Heat

ST10 Charging

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.47300000	0.31600000	0.31600000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST9 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.02900000	0.00100000	0.00100000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		2.86600000	2.86600000	2.86600000	lb/step	No

06242 Firmenich Incorporated

### Date: 6/30/2023

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST11 Discharge

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.95900000	0.95900000	0.95900000	lb/step	No

Subject Item: BP85

**Operating Scenario: OS32** 

Step: ST12 Charging/Mix

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.06300000	0.06300000	0.06300000	lb/step	No

# 000000 E8506 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>_</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<b>v</b>
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	•

# 000000 E8507 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>_</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<b>v</b>
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<b>•</b>

# 000000 E8522 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>v</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<b>v</b>
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<b>v</b>

# 000000 E8523 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>_</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<b>v</b>
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<b>v</b>

# 000000 E8527 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>_</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	•
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	•

# 000000 E8528 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>_</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<b>v</b>
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<b>v</b>

# 000000 E8539 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:	
Manufacturer:	
Model: Type of Manufacturing and Materials Handling Equipment:	
Capacity:	
Units:	<b>v</b>
Description (if other):	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<b>v</b>
Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<b>v</b>

#### 000000 E8540 (Manufacturing and Materials Handling Equipment) Print Date: 6/30/2023

Make:

Manufacturer:

Model:

Type of Manufacturing and Materials Handling Equipment:

Capacity:

Units:

Description (if other):

Have you attached a diagram showing the location and/or the configuration of this equipment?

Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?

Finit Date. 0/30/2023
Roben
D-210019
Decanting/Holding Tank
4.00E+03
gallons

Yes	$\bullet$

<b>T</b>

### New Jersey Department of Environmental Protection Reason for Application

#### **Permit Being Modified**

#### Permit Class: PCP Number: 190007

**Description** Currently, the Habanolide process consists of E8506 (V-570) and E8527 (V-57A0) which **of Modifications:** run in parallel and each peforms a peroxide reaction followed by decantation. This process is identfied in the permit as OS32. After decantation, the Habanolide feed material is transferred to E507 (V-580) for the next step in the process.

Firmenich is requesting to modify the process flow such that E8506 (V-570) and E8527 (V57A0) will perform the peroxide reaction, but the decantation step will ocur in a new vessel V-57B0. The displaced vapor in the headspace of V-57B0 will be recovered in whichever vessel (either V-570 or V-57A0) is actively transferring to V57B0 at the time. Emisions will continue to exhaust to the Pad 5 combined vent header which runs through a vapor condensor prior to discharging to atmosphere. The P&ID for the new configuration is attached.

The throughput of Habanolide will increase from 3,250 MT/yr to 3,850 MT/yr which is an increase of approximately 18.5% and is due to total batches increasing from 5.4 batches/day to 6.5 batches/day. The overall VOC emissions will be conservatively increased by 20% to address the additonal number of batches that can be made each year. There are no changes being made to the raw materials.

A description in the equipment details for V-57A0 has been updated. No other changes are being requested at this time.

Facility Name (AIMS): Firmenich Incorporated

Street FIRMENICH INCORPORATED Address: 150 FIRMENICH WAY PORT NEWARK, NJ 07114

Mailing FIRMENICH INCORPORATED Address: 150 FIRMENICH WAY PORT NEWARK, NJ 07114 Facility ID (AIMS): 06242

State Plane Coordinates:								
X-Coordinate:	595,035							
Y-Coordinate:	679,401							
Units:	New Jersey State Plane 8							
Datum:	NAD83							
Source Org.:	DEP-Program							
Source Type:	DEP Program Database							

County:	Essex
Location	East of Doremus Avenue
<b>Description:</b>	North of Turnpike Extension

| Industry: -

Primary SIC:	2869
Secondary SIC:	
NAICS:	325199

Contact Type: Air Permit Information Contact		
Organization: Firmenich Incorporated		Org. Type: Corporation
Name: Michael Damato		<b>NJ EIN:</b> 16335900001
Title: Sr. Health Safety & Environmental Manage		
<b>Phone:</b> (973) 274-6638 x	Mailing Address:	Firmenich Incorporated
<b>Fax:</b> () - x		150 Firmenich Way Port Newark NL 07114
<b>Other:</b> (973) 590-1830 x		Torritewark, its office
Туре:		
Email: michael.damato@firmenich.com		
Contact Type: Consultant		
Organization: GZA GeoEnvironmental Inc.		Org. Type: Corporation
Name: Bhuvnesh J Parekh		NJ EIN:
Title: Senior Consultant		
<b>Phone:</b> (973) 774-3323 x	Mailing	55 Lane Road, Suite 407
<b>Fax:</b> () - x	Address:	Fairfield, NJ 07004
<b>Other:</b> (862) 200-1790 x		
Type: Mobile		
Email: Bhuvnesh.Parekh@gza.com		
Contact Type: Emission Statements		
Organization: Firmenich Incorporated		Org. Type: Corporation
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Туре:		
Email: michael.damato@firmenich.com		

Contact Type: Fees/Billing Contact					
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Title: Sr. Health Safety & Environmental Manage					
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Fax: () - x	Address:	150 Firmenich Way Port Newark NL 07114			
<b>Other:</b> (973) 590-1830 x		1 Officewark, 115 0/117			
Туре:					
Email: michael.damato@firmenich.com					
Contact Trues, Desnonsible Official					
Contact Type: Responsible Official					
Organization: Firmenich Incorporated		Org. Type: Corporation			
Organization: Firmenich Incorporated Name: Ronald Kurtz		<b>Org. Type:</b> Corporation <b>NJ EIN:</b> 16335900001			
Organization: Firmenich Incorporated Name: Ronald Kurtz Title: QHS&E Director		Org. Type:         Corporation           NJ EIN:         16335900001			
Organization: Firmenich Incorporated Name: Ronald Kurtz Title: QHS&E Director Phone: (973) 589-3443 x	Mailing	Org. Type: Corporation NJ EIN: 16335900001 Firmenich Incorporated			
Organization:       Firmenich Incorporated         Name:       Ronald Kurtz         Title:       QHS&E Director         Phone:       (973) 589-3443 x         Fax:       ()	Mailing Address:	Org. Type: Corporation NJ EIN: 16335900001 Firmenich Incorporated 150 Firmenich Way Port Newark, NL 07114			
Organization:       Firmenich Incorporated         Name:       Ronald Kurtz         Title:       QHS&E Director         Phone:       (973) 589-3443 x         Fax:       ()         -       x         Other:       ()         -       x	Mailing Address:	Org. Type: Corporation NJ EIN: 16335900001 Firmenich Incorporated 150 Firmenich Way Port Newark, NJ 07114			
Organization:       Firmenich Incorporated         Name:       Ronald Kurtz         Title:       QHS&E Director         Phone:       (973) 589-3443 x         Fax:       ( ) - x         Other:       ( ) - x         Type:       ( ) - x	Mailing Address:	Org. Type: Corporation NJ EIN: 16335900001 Firmenich Incorporated 150 Firmenich Way Port Newark, NJ 07114			

## New Jersey Department of Environmental Protection Equipment Inventory

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E8523	T-582	250 gallon receiver tank for batch reaction vessel V-580 Equipment	Manufacturing and Materials Handling Equipment			No		ES12
E8527	V-57A0	4000 gallon batch reaction vesselequiptment	Manufacturing and Materials Handling Equipment			No		ES11
E8528	E-580		Manufacturing and Materials Handling Equipment			No		ES12
E8534	T-557	T-557 NBA Receiver / Feed Tank	Manufacturing and Materials Handling Equipment			No		ES10
E8535	C-5711	C-5711 NBA Wash Column	Manufacturing and Materials Handling Equipment			No		ES10
E8536	T-5711	T-5711 Washed NBA Receiver Tank	Manufacturing and Materials Handling Equipment			No		ES10

## New Jersey Department of Environmental Protection Equipment Inventory

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand- Fathered	Last Mod. (Since 1968)	Equip. Set ID
E8537	T-57A8	T-57A8 Washing NBA Feed Tank	Manufacturing and Materials Handling Equipment			No		ES10
E8539	T-551R	T-551R Mixing Tank	Manufacturing and Materials Handling Equipment			No		
E8540	V-57B0	4000 gallon Holding vessel	Manufacturing and Materials Handling Equipment			No		

### New Jersey Department of Environmental Protection Control Device Inventory

CD NJID	Facility's Designation	Description	СД Туре	Install Date	Grand- Fathered	Last Mod. (Since 1968)	CD Set ID
CD8502	C-50A5	Emergency Release Scrubber	Other				
CD8503	C-50A6	Emergency Release Scrubber	Other				
CD8504	Pad5Condense	Pad 5 Vent Header Condensers	Condenser				
CD8505	E-570	V-570 Condenser	Condenser				CS1
CD8506	E-57A0	V-57A0 Condenser	Condenser				CS1

## New Jersey Department of Environmental Protection Emission Points Inventory

PT NUD	Facility'sDescriptionConfig.Equiv.HeightDesignationDiam(ft)		ht Dist. to Exhaust Temp. (			(deg. F) Exhaust Vol. (acfm)				Discharge P	PT Set ID		
	Designation		(in.)	(111)	Line (ft)	Avg.	Min.	Max.	Avg.	Min.	Max.	Direction	Set ID
PT8501	C-50A6	Pad 5 Vent Header											
PT8502	C-50A5	C-50A5 Vent Column											
PT8505	Pad5Exhaust	Pad 5 Exhaust Fan											

Date: 6/6/2023

### New Jersey Department of Environmental Protection Emission Unit/Batch Process Inventory

#### **BP85**

#### **OS32**

Batch Process	Batch Process Operating Scenario Run Time (hours)		Min. Ca	ılc. Time: 15	.3 Max.	Calc. Time: 2	8.0	Min. User Time:			Max. User			
Step NJID	Facility's Designation	Step Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Step Time I Min.	Run Iours Max.	VOC Range	Flov (acfr Min.	v n) Max.	Ter (de Min.	np. g F) Max.
ST1	Charging	Batch Reactor Fill	Normal - Steady State	ES11	CD8502 (S) CS1 (P)	PT8502	3-01-091-99	3.0	4.0	В	0.0	10.0	32.0	95.0
ST2	Mix	Mix Batch	Normal - Steady State	ES11			3-01-091-99	4.0	6.0		0.0	1.0	32.0	95.0
ST3	Heat	Adjust temperature	Normal - Steady State	ES11	CD8502 (S) CS1 (P)	PT8502	3-01-091-99	0.5	1.0	D	0.0	5.0	32.0	140.0
ST4	Transfer	Transfer batch contents between vessels	Normal - Steady State	E8540	CD8502 (S) CS1 (P)	PT8502	3-01-091-99	0.5	1.0	В	0.0	10.0	104.0	140.0
ST5	Reheat	Reaheating of the reactor	Normal - Steady State	E8540	CD8503 (S) CD8504 (P)	PT8501	3-01-091-99	0.5	1.0	В	0.0	5.0	86.0	140.0
ST6	Charging	Batch Reactor Fill	Normal - Steady State	E8507	CD8503 (S) CD8504 (P)	PT8501	3-01-091-99	0.5	1.0	В	0.0	3.5	68.0	86.0
ST7	Feed	Transfer batch contents between vessels with heat and vacuum	Normal - Steady State	ES12	CD8503 (S) CD8504 (P)	PT8501	3-01-091-99	1.5	2.5	D	0.0	3.5	122.0	266.0
ST8	Heat	Adjust temperature	Normal - Steady State	ES12	CD8502 (P)	PT8502	3-01-091-99	0.5	1.0	D	0.0	5.0	68.0	250.0
ST9	Charging	Batch Reactor Fill	Normal - Steady State	ES13	CD8502 (P)	PT8502	3-01-091-99	0.5	1.0	D	0.0	10.0	68.0	86.0
ST10	Charging	Material Handling Tank	Normal - Steady State	ES10			3-01-091-99	1.5	2.5	D	0.0	10.0	86.0	140.0
ST11	Discharge	Withdraw product to storage tank	Normal - Steady State	E8507				0.3	1.0	В	0.0	3.5	100.0	160.0
ST12	Charging/Mix	Charging and mixing in the mixing tank	Normal - Steady State	E8539				2.0	6.0	D	0.0	10.0	32.0	150.0

### New Jersey Department of Environmental Protection Emission Unit/Batch Process Inventory

U 1

UOS	Facility's	UOS	Operation	Signif.	Control	Emission		Annual Oper. Hours VOC	Flow (acfm)	Temp. (deg F)
NJID	Designation	Description	Туре	Equip.	Device(s)	Point(s)	SCC(S)	Min. Max. Range M	in. Max.	Min. Max.

#### Date: 6/6/2023

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario: OS0 Summary** 

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		8.52000000	5.60400000	5.60400000	tons/yr	No

Subject Item: BP85

**Operating Scenario:** OS32

Step:

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)		36.80100000	1.70000000	1.70000000	lb/batch	No

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST1 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.08200000	0.00400000	0.00400000	lb/step	No

Subject Item: BP85

**Operating Scenario:** OS32

ST2 Mix

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.00000000		0.00000000	lb/step	No

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST3 Heat

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)		2.67000000	0.13400000	0.13400000	lb/step	No
DD05						

Subject Item: BP85

Operating Scenario: OS32

Step: ST4 Transfer

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.16000000	0.00800000	0.00800000	lb/step	No

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST5 Reheat

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.16000000	0.00800000	0.00800000	lb/step	No

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST6 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.05320000	0.00300000	0.00300000	lb/step	No

Date: 6/6/2023

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST7 Feed

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)		0.47300000	0.31600000	0.31600000	lb/step	No
Subject Item: BP85						

**Operating Scenario:** OS32

**ST8** Heat

Step:

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.47300000	0.31600000	0.31600000	lb/step	No

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST9 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		0.02900000	0.00100000	0.00100000	lb/step	No

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST10 Charging

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	Before Controls	After Controls	Emissions		Limit
VOC (Total)		2.86600000	2.86600000	2.86600000	lb/step	No

Date: 6/6/2023

### Date: 6/6/2023

### New Jersey Department of Environmental Protection Potential to Emit

Subject Item: BP85

**Operating Scenario:** OS32

Step: ST11 Discharge

Air Conta	aminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			0.95900000	0.95900000	0.95900000	lb/step	No
Subject Item:	BP85						
<b>Operating Scenario:</b>	OS32						
Step:	ST12 Charging/Mix						
Air Conta	aminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.

Air Contaminant Category	Fugitive	Emissions	Emissions	Total	Units	Alt. Em.
(HAPS)	Emissions	<b>Before Controls</b>	After Controls	Emissions		Limit
VOC (Total)		0.06300000	0.06300000	0.06300000	lb/sten	No

Habanolide Process VOC Emission Calculations For Permit Application Prepared in 2012 Updated in 2023

#### 1.0 REVISION OF OS32 HABANOLIDE PRODUCTION

#### 1.1 Habanolide Production Process Revisions

The equipment used and the basic types of operations being performed for OS32 Habanolide Production are not being changed. However, some of the batch steps performed in the existing equipment items involved in this process are being changed. Additionally, one reactor E 8540 (V-57B0) is added to the process.

#### **1.2 Emission Estimate Calculations for OS32**

#### Step 1. Charging of ES11/V-570 or V-57A0

With the reactor cooled to 8°C (46°F) an initial charge of approximately 810 gallons is fed to the reactor.

An estimate of the volume of gas (nitrogen plus vapor) displaced from the reaction vessel by the charge added can be calculated as follows:

Gas Displaced by Charge Added

= (810 gal)(0.1337 acf/gal)(~1 scf/acf) = 108 scf

If needed because of the oxygen concentration in the reactor head space (the space between the batch liquid and the top of the reactor), the reactor head space may be purged with nitrogen during the initial charge. If the nitrogen purge is used, the flow rate will be approximately 20 scfm and the duration will be approximately 5 minutes. This will result in a nitrogen purge gas volume of approximately 100 scf. The nitrogen purge gas will enter the top of the reactor and it will flow through the upper portion of the head space.

The total amount of gas displaced from the reactor (including both the gas displaced by the feed and the gas displace by the nitrogen purge) will be approximately 208 scf.

The displaced gas contains vapors of the feed materials. The vapors are due principally to the predominant and most volatile of the feed materials, n-butyl acetate (NBA). The vapor pressure of NBA at the batch temperature of 46°F is approximately 4 mm Hg. The gas is not saturated with feed vapors, however, because the reactor was empty prior to charging and there is not sufficient time during charging for saturation to occur. This situation is comparable to a storage tank with a high turnover rate, in which the head space vapor concentration is well below saturation. In the USEPA AP-42 organic liquid storage tank emission calculation procedures, this was accounted for by a "turnover factor" which related the approach to saturation to the frequency of turnovers. A "saturation factor" of 0.25, corresponding to a "turnover factor" for a high turnover frequency, is used to estimate the approach to saturation during initial charging of the reactor.

Based on the above information, an estimate of the amount of VOC vapor emitted during charging can be calculated as follows:

VOC Vapor Emitted During Charging and Purging

= (0.25)(208 scf gas)(4 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor)

```
= 0.0820 lb
```

```
Maximum VOC Range:
VP at 70°F = 10 mm Hg = 0.19 psia
Worst-Case Maximum Vapor Concentration
= (0.25)(4/760) = 0.13%
VOC Range is B
```

#### Step 2. Mix

The batch is mixed, allowed to settle, and then wastewater from the batch is discharged to the wastewater system. There are no emissions during this operation.

#### Step 3. Heat

The batch is heated from 45 to 55°C. The batch volume at the time of heating is approximately 2280 gallons.

An estimate of the volume of gas above the batch in the reactor prior to heating can be calculated as follows:

Reactor Head Space Volume Prior to Heating = (4000 gal - 2280 gal)(0.1337 acf/gal)(530 scf/573 acf) = 213 scf

An estimate of the volume of gas above the batch in the reactor after heating can be calculated as follows:

Reactor Head Space Volume After Heating = (4000 gal - 2280 gal)(0.1337 acf/gal)(530 scf/591 acf) = 206 scf

A very conservative estimate of the amount of gas displaced by evaporation of volatile batch constituents (NBA and water) can be estimated by assuming that these constituents exert their pure substance vapor pressures after heating and exert zero vapor pressure prior to heating.

The vapor pressure of NBA after heating is  $\sim$  56 mm Hg  $\sim$ 0.074 atm The vapor pressure of water after heating is  $\sim$  118 mm Hg  $\sim$ 0.155 atm

An estimate of the volume of noncondensible gas after heating can be calculated as follows:

Noncondensible Gas Volume After Heating = (206 scf)(1 - 0.074 - 0.155) = 159

Accordingly, a very conservative estimate of the amount of gas displaced by heating can be calculated as follows:

Volume of Gas Displaced by Heating = 213 scf - 159 scf = 54 scf

If needed because of the oxygen content in the reactor head space, the reactor head space may be purged with nitrogen before the batch is heated. The flow rate of the nitrogen purge would be approximately 20 scfm and the duration would be approximately 5 minutes. This would result in a nitrogen purge gas volume of approximately 100 scf. If a nitrogen purge is conducted, the total volume of gas emitted from the reactor during the heating step would be 154 scf.

The vapor pressure of NBA at the average batch temperature during heating is approximately 44 mm Hg. Assuming the gas is saturated with NBA vapor at the condenser outlet, estimates of the vapor emitted by heating can be calculated as follows:

VOC Vapor Emitted During Heating, Before Control = (154 scf gas)(44 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor) = 2.67 lb VOC Vapor Emitted During Heating, After Control = (154 scf gas)(6.5 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor) = 0.395 lb Maximum VOC Range:

VP at 70°F = 10 mm Hg = 0.19 psia Worst-Case Maximum Vapor Concentration = (44/760) = 5.8% VOC Range is D

#### Step 4. Transfer to E8540/V-57B0

The batch is transferred from the BOH reactor, V-570 or V-57A0, to new holding tank, V-57B0. The displaced volume of gas/vapor during this step is roughly equivalent to the volume in the BOH reactor (~2,900 gallons) after heating to  $55^{\circ}$ C plus ~100 gallons of tempered de-ionized water used to flush the line. During the transfer, the headspaces can be assumed to exist at  $55^{\circ}$ C.

Normally, the transfer is conducted with the two reactors having equalized headspaces; this measure is meant to reduce the volume of gas/vapor emitted during the transfer, since the only difference in volume comes from the line flushing, only 100 gallons of vapor are displaced.

If one is to consider the unlikely situation that the equalizing valve remains closed during the transfer, then a full 3,000 gallons of volume will be displaced to the emission point.

An estimate of the volume of gas (nitrogen plus vapor) displaced from the reaction vessel by the charge added can be calculated as follows:

Gas Displaced by Charge Added

= (3,000 gal)(0.1337 acf/gal)(~1 scf/acf) = 401 scf

If needed because of the oxygen concentration in the reactor head space (the space between the batch liquid and the top of the reactor), the reactor head space may be purged with nitrogen during the initial charge. If the nitrogen purge is used, the flow rate will be approximately 20 scfm and the duration will be approximately 5 minutes. This will result in a nitrogen purge gas volume of approximately 100 scf. The nitrogen purge gas will enter the top of the reactor and it will flow through the upper portion of the head space.

The total amount of gas displaced from the reactor (including both the gas displaced by the feed and the gas displace by the nitrogen purge) will be approximately 501 scf.

The displaced gas contains vapors of the feed materials. The vapors are due principally to the predominant and most volatile of the feed materials, n-butyl acetate (NBA). The vapor pressure of NBA at the batch temperature of 131 °F is approximately 4 mm Hg. The gas is not saturated with feed vapors, however, because the reactor was empty prior to charging and there is not sufficient time during charging for saturation to occur. This situation is comparable to a storage tank with a high turnover rate, in which the head space vapor concentration is well below saturation. In the USEPA AP-42 organic liquid storage tank emission calculation procedures, this was accounted for by a "turnover factor" which related the approach to saturation to the frequency of turnovers. A "saturation factor" of 0.25, corresponding to a "turnover factor" for a high turnover frequency, is used to estimate the approach to saturation during initial charging of the reactor.

Based on the above information, an estimate of the amount of VOC vapor emitted during charging can be calculated as follows:

VOC Vapor Emitted During Charging and Purging

= (0.25)(401 scf gas)(4 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor)

= 0.16 lb

Maximum VOC Range: VP at 130°F = 10 mm Hg = 0.19 psia Worst-Case Maximum Vapor Concentration = (0.25)(4/760) = 0.13% VOC Range is B

#### Step 5. Reheat V-57B0

In the unlikely event that a shutdown occurs, V-57B0 will cool down. Before resuming operation, V-57B0 must be warmed up from ~30°C to an operating temperature of 55°C. The resulting change in density will result in a displaced volume through the vent going to the emission point. The VOC emission will remain the same as charging the vessel and the calculations are shown above. VOC Range is B

#### Step 6. Charging of E8507/V-580

An initial charge of NBA plus inorganic materials is added to reactor V-580. The volume of the material charged is approximately 200 gallons.

An estimate of the volume of gas (nitrogen plus vapor) displaced from the reaction vessel by the charge added can be calculated as follows:

Gas Displaced by Charge Added

= (200 gal)(0.1337 acf/gal)(~1 scf/acf) = 27 scf

The average temperature of the equipment and the feed materials at the time of charging is estimated to be approximately 70°F, and the maximum temperature in not expected to exceed 90°F. To provide a margin of safety for the air permit, a temperature of 90°F is used for the emission estimate calculations. Since the vessel is empty prior to charging, a vapor saturation factor of 0.25 is used in the calculations.

The vapor pressure of the volatile batch constituent (NBA) at the conservative batch temperature of 90°F is less than 20 mm Hg. Based on this information, an estimate of the VOC vapor emitted during charging can be calculated as follows:

VOC Vapor Emitted During Charging = (0.25)(27 scf gas)(20 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor) = 0.0532 lb

Maximum VOC Range:

VP at 70°F = 10 mm Hg = 0.19 psia Worst-Case Maximum Vapor Concentration = (0.25)(20/760) = 0.66% VOC Range is B

#### Step 7, 8. ES12 Feed, Heat

The batch is heated and feed from V-57B0 is drawn into the reactor and reacted as the pressure is steadily reduced and then held at the vacuum set point. The gas above the batch in the reactor will be displaced and withdrawn from the reactor by the heating and pressure reduction. An estimate of the volume of the gas emitted from the reactor can be calculated as follows:

Gas Volume Emitted During Heating, Evacuating, Charging and Reacting

= (800 gal - 200 gal)(0.1337 acf/gal)(~1 scf/acf) = 80 scf

The gas passes through V-580 process condensers where NBA is condensed from the gas and drained into receiver tank T-582. Tank T-582 is under vacuum, interconnected with V-580, so no gas/vapor is emitted from the tank as NBA is drained into it. Before being discharged to the atmosphere, the gas withdrawn from V-580 passes through the Pad 5 condenser system, which has been designated emission control device CD8504.

To reduce VOC emissions, the Pad 5 condenser is cooled with tempered chilled water. As explained in Section 3.2, the condenser system is controlled so that under normal operating conditions (i.e., not emergencies or process upsets) the condenser gas outlet temperature does not exceed 60°F. For conservatism, and to provide a margin of safety, 70°F is specified as the "average exhaust temperature" for the RADIUS permit application, and 70°F is the temperature used for computing controlled VOC emissions. Use of condenser cooling water that is not chilled, tempered, and controlled can be used as a basis for estimating the VOC emission rate without control. For this purpose, the average exhaust gas temperature is assumed to be 85°F. The vapor pressure of the volatile batch constituent (NBA) at the condenser outlet temperature of 70°F is approximately 10 mm Hg. The vapor pressure of NBA at 85°F is approximately 15 mm Hg. Based on this information, estimates of the VOC vapor emissions can be calculated as follows:

VOC Vapor Emitted During Heating, Evacuation, Charging and Reacting Before Control = (80 scf gas)(15 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor) = 0.473 lb

VOC Vapor Emitted During Heating, Evacuation, Charging and Reacting After Control = (80 scf gas)(10 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor) = 0.316 lb

Maximum VOC Range: VP at 70°F = 10 mm Hg = 0.19 psia Worst-Case Maximum Vapor Concentration = (15/760) = 2.0% VOC Range is D

#### Step 9. ES13 Charging

During the initial charging of V-580, a small amount of catalyst is fed from T-580. The catalyst is in an NBA solution. The amount of solution charged per batch is approximately 50 to 55 gallons. T-580 is periodically replenished with catalyst solution. A portion of the vapor that is emitted during replenishment is accounted for in each batch emission calculation based on the quantity of solution used for each batch.

Accordingly, based on the vapor pressure of NBA at 70°F (approximately 10 mm Hg), the portion of T-580 replenishment vapor emissions associated with each batch can be calculated as follows:

Portion of T-580 Replenishment Vapor Emissions Associated with Each Batch = (55 gal)(0.1337 acf/gal)(~1scf/acf)(10 scf vapor/760 scf gas) x (1 mole vapor/387 scf vapor)(116 lb vapor/mole vapor) = 0.0290 lb

Maximum VOC Range: VP at 70°F = 10 mm Hg = 0.19 psia Worst-Case Maximum Vapor Concentration = (10/760) = 1.3% VOC Range is D

#### Step 10. ES10 Charging

Charging of the storage tanks T-557, C-5711, T-5711 and T-57A8 from T-582 which is a receiver tank for the batch reactor V-580.

Mass transferred/batch = 7000 kg Approximate volume displaced/ batch = 2178.6 gal Batch/day = 8 Volume/ day = 66 m<sup>3</sup> Volume fraction VOC = 0.0403 Density = 0.91 kg/m<sup>3</sup> (66 m<sup>3</sup>) = 59.77 kg /day (kmol/28kg of N<sub>2</sub>) = 2.13 kmol N<sub>2</sub>/day (0.0403) = 0.09 kmol VOC/day VOC emissions = 0.09 kmol VOC/day (116 kg vapor/mole vapor) = 10.40 kg VOC/day = 3.42 ton VOC/ year

VOC Range D

#### Step 11. E8507 Discharge

The batch of crude product is discharged to a crude product storage tank.

Mass transferred/batch = 2200 kg

Approximate volume displaced/ batch = 582 gal

Batch/day = 8

Volume/ day =  $17.6 \text{ m}^3$ 

Volume fraction VOC = 0.0040 Density = 0.975 kg/m3 (17.6 m<sup>3</sup>) = 17.22 kg/day (kmol/28kg of N<sub>2</sub>) = 0.61 kmol N<sub>2</sub>/day (0.0040) = 0.03 kmol VOC/day

VOC emissions = 0.03 kmol VOC/day (116 kg vapor/mole vapor) = 3.48 kg VOC/day = 1.4 ton VOC/ year

VOC Range B

#### Step 12. E8539 Charging/Mixing

Catalyst solution is made in campaigns in T-551R, operators charge materials to the tank on a scheduled basis and the tanks recirculation ensure the solution is well mixed. Drums of 60°C non-volatile heavies are charged with a non-volatile catalyst mixture and volatile butyl-acetate from T-5A02. The charge recipe results in a solution that is 45% n-butyl acetate by mass.

Mass transferred/batch = 185 kg

Approximate volume displaced/ batch = 51.5 gal

Batch/day = 8

Volume/ day =  $1.6 \text{ m}^3$ 

Volume fraction VOC = 0.0372 Density = 0.91 kg/m<sup>3</sup> (1.6 m<sup>3</sup>) = 1.47 kg/day (kmol/28kg of N<sub>2</sub>) = 0.05 kmol N<sub>2</sub>/day (0.0372) = 0.002 kmol VOC/day

VOC emissions = 0.002 kmol VOC/day (116 kg vapor/mole vapor) = 0.23 kg VOC/day = 0.09 ton VOC/ year

VOC Range D

Equipment	Facility's Designation	Description	Old Equipment/Control Device Set	New Equipment Set ID	Significant / Insignificant
E8534	T-557	T-557 NBA Receiver / Feed Tank			Significant
E8535	C-5711	C-5711 NBA Wash Column	FC 1	5640	Significant
E8536	T-5711	T-5711 Washed NBA Receiver Tank	ES-1	ESIO	Significant
E8537	T-57A8	T-57A8 Washing NBA Feed Tank			Significant
E8506	V-570	4000 gallon batch reaction vessel	FC 2	FC11	Significant
E8527	V-57A0	4000 gallon batch reaction vessel	ES-2	ES11	Significant
E8507	V-580	800 gallon batch reaction vessel			Significant
E8528	E-580		ES-3	ES12	
E8523	T-582	250 gallon receiver tank for batch reaction vessel	-		Insignificant
E8507	V-580	800 gallon batch reaction vessel	FC 4	EC12	Significant
E8522	T-580	1200 gallon feed tank for batch reaction vessel	E34	E313	Significant
E8540	V-57B0	4000 gallon Holding vessel	E8540	E8540	Significant
E8539	T-551R	T-551R Mixing Tank	E8539	E8539	Significant
E8507	V-580	800 gallon batch reaction vessel	E8507	E8507	Significant
CD8505	E-570	V-570 Condenser	CC 1	661	-
CD8506	E-57A0	V-57A0 Condenser	CS-1	CSI	-
CD8504	Pad5Condensers	Pad 5 Vent Header Condensers	CD8504	CD8504	-
CD8502	C-50A5	Emergency Release Scrubber	CD8502	CD8502	-
CD8503	C-50A6	Emergency Release Scrubber	CD8503	CD8503	-

	Stan Run Time (hours)									Flow (acfm)		Temperature (deg F)		
		Store Description	On emotion Turne	Significant	Control			otep num		VOC			(uc)	
Step NJID	Facility's Designation	Step Description	Operation Type	Equipment	Device(s)	Emission Point(s)	SCC(s)	Min	Max	Range	Min	Max	Min	Max
1	Charging	Batch Reactor Fill	Normal-Steady State	ES11	CS1(P), CD8502(S)	PT8502	3-01-091-99	3	4	В	0	10	32	95
2	Mix	Mix Batch	Normal-Steady State	ES11			3-01-091-99	4	6	-	0	1	32	95
3	Heat	Adjust temperature	Normal-Steady State	ES11	CS1(P), CD8502(S)	PT8502	3-01-091-99	0.5	1	D	0	5	32	140
4	Transfer	Transfer batch contents between vessels	Normal-Steady State	E8540	CS1(P), CD8502(S)	PT8502	3-01-091-99	0.5	1	В	0	10	104	140
5	Reheat	Reheating of the reactor	Normal-Steady State	E8540	CD8504(P), CD8503(S)	PT8501	3-01-091-99	0.5	1	в	0	5	86	140
6	Charging	Batch Reactor Fill	Normal-Steady State	E8507	CD8504(P), CD8503(S)	PT8501	3-01-091-99	0.5	1	В	0	3.5	68	86
7	Feed	Transfer batch contents between vessels with heat and vacuum	Normal-Steady State	ES12	CD8504(P), CD8503(S)	PT8501	3-01-091-99	1.5	2.5	D	0	3.5	122	266
8	Heat	Adjust temperature	Normal-Steady State	ES12	CD8502 (P)	PT8502	3-01-091-99	0.5	1	D	0	5	68	250
9	Charging	Batch Reactor Fill	Normal-Steady State	ES13	CD8502 (P)	PT8502	3-01-091-99	0.5	1	D	0	10	68	86
10	Charging	Manufacturing and Material Handling	Normal-Steady State	ES10	-	-	3-01-091-99	1.5	2.5	F	0	10	86	140
11	Discharge	Discharge to tanks	Normal-Steady State	E8507	-	-		0.25	1	G	0	3.5	100	160
12	Charging/Mix	Charging and mixing in the mixing tank	Normal-Steady State	E8539	-	-		2	6	н	0	10	32	150

					Before Cor	trol Devices				After Control Devices			
			Time per		Time per		Days of						
Step NJID	VOC Range	lb/step	step (min)	lb/hr	Batch (hr)	lb/batch	operation / yr	lb/yr	Tons/yr	lb/step	lb/hr	lb/batch	lb/yr
1	В	0.0820	60	0.08	4.00	0.33	220	144.32	0.07	0.00	0.00	0.02	7.22
2	-	-	-	-	-	-	-	-	-	-	-	-	-
3	D	2.67	60	2.67	1.00	2.67	220	4,699.20	2.35	0.13	0.13	0.13	234.96
4	В	0.16	60	0.16	1.00	0.16	220	281.60	0.14	0.01	0.01	0.01	14.08
5	В	0.16	60	0.16	1.00	0.16	220	281.60	0.14	0.01	0.01	0.01	14.08
6	В	0.05	60	0.05	1.00	0.05	220	93.63	0.05	0.00	0.00	0.00	4.68
7	D	0.47	60	0.47	2.50	1.18	220	832.48	0.42	0.32	0.32	0.79	556.16
8	D	0.47	60	0.47	1.00	0.47	220	832.48	0.42	0.32	0.32	0.32	556.16
9	D	0.03	60	0.03	1.00	0.03	220	51.04	0.03	0.00	0.00	0.00	2.55
10	F	2.87	60	2.87	1.00	2.87	298	6,832.50	3.42	2.87	2.87	2.87	6,832.50
11	G	0.96	60	0.96	1.00	0.96	365	2,800.28	1.40	0.96	0.96	0.96	2,800.28
12	Н	0.06	60	0.06	1.00	0.06	365	185.08	0.09	0.06	0.06	0.06	185.08
	Total							17,034.2	8.5				11,207.75

Tons/yr
0.00
-
0.12
0.01
0.01
0.00
0.28
0.28
0.00
3.42
1.40
0.09
5.604

CAS #		
7722-84-1		
123-86-4		
32539-83		
104-15-4		
1310-73-2		
7757-83-7		

	Firmenich Item Code	Kgs	Percent
-	971779	754	7%
	900608	6490	63%
-6	916575	1887	18%
	988100	31	0.3%
2	966250	40	0.4%
7	982226	1056	10%
	Total =	10,258	100%