Call to Order
Acting Chair Steven Jenkins called the Public Hearing of the Environmental Protection Board (EPB) to order at 5:18 p.m.

Acting Chair Steven Jenkins read a statement which provided an outline of how the hearing would proceed: presentation by staff, presentation by petitioner, comments from public, board discussion and clarification, board action and procedural summary.
EPB Staff Statement
James Richardson, EPB Administrator stated on July 13, 2015, a Petition for Rulemaking was received from Renessenz, LLC. The petition seeks the repeal or abolishment of JEPB Rule 5 – Control of TRS and VOC Emissions from Crude Sulfate Turpentine Processing Facilities. In accordance with JEPB Rule 1.202, the JEPB initiated the rulemaking process at the August meeting.

In response to the public notice of the hearing, we received one written comment which was emailed as part of the meeting packet (copies are available for review). After seeking input and suggestions for specific information, today the JEPB will have formal presentations by the Petitioner and by EQD Program Staff. The Board will have an opportunity to ask questions as needed to assist in making a thoughtful and informed decision. There is no deadline involved with this request. With that, Mr. Richardson asked that the Chair open presentations.

Presentation by Petitioner
Whitney McGuire, attorney representing Renessenz, LLC, provided background of how Renessenz came to submit the petition to repeal or abolish JEPB Rule 5 Control of TRS and VOC Emissions from Crude Sulfate Turpentine Processing Facilities. Her presentation covers why Renessenz is requesting repeal of the rule versus amending the rule and other background and supporting information. (a copy of the presentation is attached).

Program Staff Comments
Steve Pace, P.E., EQD Air Branch Manager began presentation with a brief history from 1984 to the present.

Action Taken
- Chapter 376 Ordinance Code
- JEPB Rule 1 Organization Procedure and Practice established the procedure for odor complaint verification and validation.
- JEPB Rule 5 Control of TRS and VOC Emissions from Crude Sulfate Turpentine Processing Facilities

Renessenz has petitioned to repeal or abolish JEPB Rule 5 Control of TRS and VOC Emissions from Crude Sulfate Turpentine Processing Facilities. IFF supports abolishing JEPB Rule 5. Renessenz and IFF are the only two facilities subject to the rule.

Based on Renessenz/IFF request the EQD reviewed JEPB Rule 5 in detail reviewing 2014 odor complaints data against each facility and also reviewed the odor complaints, air pollution, and noise pollution complaints received for 2010 – 2014 against each facility.

Odors now address a much broader spectrum of sources of the community’s complaints on odors. We have dumpsters, lift stations, garbage, sewage/septic tanks, dead animals, pesticides, opening burning, natural gas leaks, chemicals, paint odors etc.

When promulgated, Rule 5 mandated daily inspections, routine checks and monitoring which was necessary to start the cleanup process. If requirements were to be followed, Rule 5 shields facilities processing CST from TRS odor emissions being classified as objectionable.

Given that JEPB Rule 5 only addresses objectionable odor related to TRS, and Chapter 376 Ordinance Code and EPB Rule 1 provide the means to continue to address objectionable odors throughout the City without limitation, the EQD staff supports the Renessenz/IFF request to repeal EPB Rule 5.

Board Member Dr. Sonnenberg inquired if TRS emissions are regulated in any way other than through odor. Mr. Pace stated the Rule 5 is a mechanism for addressing the odors from TRS. Chapter 376 Ordinance Code and EPB Rule 1 will provide the same regulatory authority.
Comments from Public
Councilman Tommy Hazouri (Mayor 1988-1991) stated we have come a long way on the odor issues and he appreciates the job done EPB has done. At the time while running for office, there were two issues – tolls and odors. The odor issue was a prime priority because there was a rotten egg smell in Jacksonville. A lot has changed since then, including the modernization of the facilities. Staff has indicated that they can more diligently enforce which can’t be done under Rule 5 today. Councilman Hazouri supports the repeal of Rule 5 and supports EQD’s recommendation. The repeal of Rule 5 shows true partnership with economic development and our quality of life at the same time.

Response(s) To Public Comments
   a. Renessenz, LLC – none
   b. Program Staff – none

Board Member Tony Bellamy entertained a motion to abolish Rule 5 per staff’s recommendation which was properly seconded (FU) and opened for board discussion.

Board Discussion and Staff Clarification
Board Member Dr. Sonnenberg stated her concern is to be absolutely sure that every protection that is available for the community, effective or not, and everything Renessenz is required to do, or the objective of the practices that Renessenz/IFF are required to do under Rule 5 will stay in place and nothing will go away when rule 5 is abolished. Rule 5 is actually trying to reduce emissions; it doesn’t really say that the intent is to reduce odors. It is seen as hand in hand with the odor rules. This is an emission rule and the tactics required can be used to make sure that the entities are doing everything in their power to reduce TRS emissions. They have not only odor implications but also property implications. If Renessenz is not required to report leaks to FDEP, EPA and Title V, what is the implication going to be. Based on those issues, she would not be ready to vote to abolish. She expressed appreciation for the information provided by Renessenz.

Board Member Dr. Roi Dagan stated that it seems despite all changes evolving in Jacksonville one (1) out of eight (8) odor complaints is still related to this product and it seems like a lot; It appears to still be a major source of odors. The fault of Rule 5 is the shield provision. Dr Dagan inquired whether simply abolishing the shield provision would help us better serve the public since it’s still a major odor issue just by the numbers presented.

Steve Pace stated it could be done, however what advantage would it present? All the reporting will have to be done and there is no real value to that because originally the concept was to allow safe harbor from enforcement actions. If the rule is abolished, if an odor complaint is received staff can address the odor issue rather than trying to track all the reporting. With EPB Rule 1 which establishes the procedure for odor complaint verification and validation and Chapter 376 Ordinance Code all odor complaints can be addressed throughout Duval County. No authority or any regulatory authority is lost.

Several questions ensued regarding leak detections, recordkeeping, reportable quantity thresholds for a liquid leak, regulations under EPB Rule 1 and Chapter 376, etc.

Jason Teal shared that EPB Rule 5 was adopted to provide the industry at that time with an exemption. If an odor was the result of a particular product and the entity could demonstrate compliance with everything else, then there is no citation. In terms of performance based versus regulating the industry, the tradeoff was giving a shield but in exchange for that the entity has to demonstrate compliance with all regulatory requirements on a day to day basis, and if this is done yet there is still an odor, there is safe harbor. From the perspective of the industry and the agency, simplify the entire process. If there is an odor, a complaint is received and verified then instant action can be taken.

What happens now if there is an odor smell, a complaint is received (4 hours to comply), odor is verified, analysis is made where the smell comes from within the facility, have 5 days to correct. If issue corrected in 5 days, there is safe harbor. With abolishment, if there is an objectionable odor that leaves the facility, a complaint is received and verified then instant action could be taken which may be to initiate enforcement action.
Board Vote
The Chair sought a vote on the motion. Board Member Sonnenberg asked if the hearing could be continued until a date and time certain. It was stated that the motion on the table would have to first be voted down. Then someone could offer a motion to continue the hearing for consideration. A question was asked could the rule be suspended for one year. Jody Brooks stated that the Board is acting upon a petition that has been filed to repeal or abolish JEPB Rule 5 and the only option is to approve or deny the petition.

A motion was entertained to approve the petition to repeal EPB Rule 5, (Bellamy) which was properly seconded (Fu) and approved by the Board Vote with a 4-1 vote. (Bellamy, Fu, Dagan, Jenkins – approve, Sonnenberg – opposed).

Procedural Summary
The Repeal will be forwarded to the Council Secretary for publication and twenty days after filing, will become effective.

Adjournment
There being no further business to come before the Board, the Board hearing adjourned at 7:05 pm.

Respectfully Submitted

Ruby Tucker, Executive Assistant to EQD Chief
Environmental Protection Board – Rulemaking: Petition to Repeal or Abolish EPB Rule 5

September 14, 2015
Objectionable Odor Emissions: General Responsibilities

Environmental Quality Department (EQD) Ensures Sources of Verified Objectionable Odors Are Identified and Takes Actions to Ensure Facilities Eliminate Odor Causing Emissions by:

- Responding to Citizen Odor Complaints
- Communicating Complaints to Facilities
- Instituting Enforcement Actions to Ensure Facilities Do Not Emit Objectionable Odors
Objectionable Odor Emissions: General Responsibilities

Facilities:
- Respond to Complaints of Objectionable Odor Emissions Through Investigation and Corrective Actions
- Make Investment in Equipment and Develop Processes to Prevent Emissions of Objectionable Odors
Ordinances and Rules Other Than EPB Rule 5 Available to Enable EQD to Achieve Its Goals

Chapter 376 Ordinance Code and EPB Rule 1: Regulate ALL Objectionable Odors, Including Total Reduced Sulfur (TRS)

PLUS

Title V Permit (Renessenz) Prohibits Emissions of Bad Odors
What Does EPB Rule 5 Do?

Regulates TRS (Only) Emissions

Prescribes “1993” Operating Procedures and Record Keeping and Reporting Requirements for Crude Sulfate Turpentine (CST) Processing Operations

AND

**SHIELDS** Facilities Processing CST From TRS Odor Emissions Being Classified As Objectionable In Exchange For Complying With Its Provisions
Rule 5 Imposes OUTDATED (circa 1993) Operational Requirements That Impair Best Practices

- **Operating Requirements:**
  - **PREVENT** Use of Currently Best Available Technology (e.g., FLIR Infrared Camera to Detect Leaks)
  - Do Not Recognize Facilities’ Current Operating and Recordkeeping Procedures
  - Emphasize Department’s Unfamiliarity With Current CST Processing Operations
Rule 5 Sets Up Reporting Requirements that “Dead End” with Department

- If Leak Cannot Be Repaired within 5 Days – Must Obtain “Approval” from Department:
  - To whom is request made?
  - How does Department determine whether to grant permission to exceed?
  - How does Department communicate that permission is granted or denied?
- Must Provide 14 Days Notice to Department Before Cleaning Tank
  - To whom is request made?
  - How does Department determine whether to observe?
  - What does Department do during observation?
- Regulated Can Request Relief from Rule 5 Requirements – FLIR IR camera example.
Rule 5 Imposes Reporting Requirements That Are Burdensome to Both the Regulated and the Regulator

- Reporting Requirements Require
  - Facilities to Separately Track and Prepare Reports of TRS Only Leaks, Spills and Emissions
  - EQD to Track Submittal of Records and Review Records to Timely Identify Deficiencies or Non-Compliances
- TRS Only Reporting Is Costly to Facilities and to EQD and Provides No Benefit
  - EQD Has Limited Personnel and Budgetary Resources That Can Be Used to More Broadly Monitor and Regulate Odors
Rule 5 Imposes Unnecessary Recordkeeping Requirements (circa 1993)

- Recordkeeping Requirements Are Unnecessary
  - Facilities Are Motivated to Maintain Records Necessary to Investigate/Explain Objectionable Odor Complaints
  - EQD Is Not Proactively Requesting Records
- Rule 5 Requires Facilities to Retain (for up to 2 Years) to “Prevent” TRS Emissions
Separate Regulation of TRS Emissions Is Not Necessary

- Rule 5 Is Obsolete Because:
  - Emissions of TRS Are Not a Major Source of Objectionable Odors in the City of Jacksonville As They Were When Rule 5 Was Promulgated in 1991 and Amended in 1993
  - Business Attitudes Have Shifted to More Efficient Manufacturing Operations That Generate Less Waste/Emissions
  - Regulation of Facilities Processing CST Is More Organized
  - Facilities Voluntarily Participate in Certification Programs that Impose Audit, Recordkeeping, Procedural and Reporting Requirements, e.g., ISO 14001/Responsible Care, ISO 9001, FSSC
  - Social Pressures to Be A Good Neighbor Are Greater
Equipment Upgrades

- Vapor Recovery System to Capture CST Vapors from Process and CST Unloading
- Upgraded Process Control Equipment and Process Control System
- Modified CST Railcar Unloading Procedure (dip tube vs. manway)
Additional Recent Improvements

- CST Tank Replacement and Repair - $2M
- Installed Tank Level Control Devices (100 tanks) - $500K
- Replaced Manway Cover on High Sulfur Water Tank
- Upgrade to Foul Waste Water Tank - $50K
- Spray System Waste Water Treatment Open Clarifier - $50K
- Planned Upgrade to Waste Water Treatment Plant Year End 2015 - $1.2MM
Odor Prevention Measures That Will Continue Without Rule 5

- Daily Operator Rounds to inspect for Odor Sources
- Weekly Inspections for Leaks/Emissions using Infrared (IR) Camera
- Immediate Response to Community Odor Complaints
- Tracking of Leaks/Emissions in Gensuite Program
- Corrective Action Plan to Respond to Leaks/Emissions
- Preventive Maintenance on Odor Control Equipment
- Employee Training and Awareness
Rule 5 Is Not Needed to Regulate Objectionable Odors

- Under Chapter 376 Ordinance Code and Rule 1 Environmental Quality Department Regulates **ALL** Objectionable Odors, Including, But Not Limited To, Odors Associated with Reduce Sulfur Compounds and Total Reduced Sulfur (TRS)

- Rule 5 Only Covers Areas of Facilities Processing Crude Sulfate Turpentine (For Renessenz This Encompasses Approximately Half of the Plant)

- Rule 5 **Shields** Persons from Enforcement Actions Associated with Objectionable Odors Associated with TRS Emissions Made in Compliance with Rule 5’s Requirements → Translation: “We Can Stink” As Long As We Maintain All Paperwork and Complete All Reporting
  - How does EQD or the Air, Odor and Noise Committee explain to a citizen it cannot bring an enforcement action?
Chapter 376 Ordinance Code and Rule 1 Meet All Needs

- Under Chapter 376 Ordinance Code and Rule 1, Environmental Quality Department Regulates **ALL** Objectionable Odors, Including, But Not Limited To, Odors Associated with Reduce Sulfur Compounds and Total Reduced Sulfur (TRS)

- CST Processing Facilities Have More Exposure Under Chapter 376 and Rule 1 Because The Rule 5 Carve-Out Is Eliminated
  - Facilities will be motivated to ensure they monitor, inspect, repair and maintain records in the event a validated odor complaint is lodged or enforcement action commenced
Jacksonville Site

Established in 1910
54 acres
Business Headquarters
• Administration
• R&D
Specializes in:
• CST fractionation
• Coolants
• Batch specialty operations
Certified:
ISO 9001
ISO 14001/ Responsible Care
Food Safety System Certification (FSSC) 22000
How we make our products

- Crude Sulfate Turpentine (CST) is the starting material for most of our products.
- The CST we use is a by-product from paper manufacturing.
- Using a distillation process we remove the sulfur from fresh CST and then create the Turpene based flavors and fragrances.
- We have been running the current CST distillation process for more than 60 years.
Products Enhanced by Renessenz Flavors & Fragrances
Disclaimer

Unless otherwise restricted by applicable law, nothing contained in this literature shall be deemed a representation or warranty of any kind, either expressed or implied. The suggestions of use given in this literature are based on customer reports and presented for your own investigation and verification. Products discussed are sold only on the basis of conforming to specifications, but without warranty, expressed or implied, in the law or in fact, of merchantability or fitness for a particular purpose and upon the condition that purchasers make their own tests to determine the suitability of such products for their particular purposes. Statements concerning the possible use of our products or processes described are not intended as recommendations or permission to use the same in the infringement of any patent, or to practice a patented invention without a license. By reason of lack of knowledge as to specific end uses of this product, no representation or warranty is made as to the conformance of the product with food contact laws or regulations. See the Material Safety Data Sheets (MSDS) for this product for safety information prior to use.
<table>
<thead>
<tr>
<th>Process Operations Control</th>
<th>Rule 5 Requirement</th>
<th>Retention Period/Deadline to Submit</th>
<th>Federal, State or Local Laws and Permit Requirements</th>
<th>Notes</th>
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<td><strong>Control Requirements</strong></td>
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<tr>
<td><strong>CST Unloading</strong></td>
<td>Emissions of CST/TRS shall be captured and either scrubbed or thermally oxidized; or unloading shall be conducted under vacuum.</td>
<td><strong>Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.</strong>&lt;br&gt;<strong>Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).</strong>&lt;br&gt;<strong>Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.</strong>&lt;br&gt;<strong>EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints.</strong></td>
<td>In order to maintain certifications held by Renessenz, such as ISO 9001, ISO 14001/Responsible Care, plant must have written operating procedures. Plant has developed draft general odor emission control procedure that incorporates unloading requirements.</td>
<td></td>
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<tr>
<td><strong>Liquid (CST or TRS Containing) Storage</strong></td>
<td>Emissions of CST/TRS shall be captured and thermally oxidized.</td>
<td><strong>Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.</strong>&lt;br&gt;<strong>Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).</strong>&lt;br&gt;<strong>Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.</strong>&lt;br&gt;<strong>EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints.</strong></td>
<td>In order to maintain certifications held by Renessenz, such as ISO 9001, ISO 14001/Responsible Care, plant must have written operating procedures. Plant has developed draft general odor emission control procedure that incorporates storage requirements.</td>
<td></td>
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<tr>
<td><strong>Stripping of Fractionation Columns</strong></td>
<td>All vapors/organic liquid waste streams from CST stripping columns and gases from fractionation columns shall be captured and thermally oxidized.</td>
<td><strong>Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors</strong>&lt;br&gt;<strong>Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).</strong>&lt;br&gt;<strong>Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.</strong>&lt;br&gt;<strong>EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints.</strong></td>
<td>Renessenz must file a Title V permit application every five years in which the company must estimate VOC emissions. Further, the vapor recovery system, controls VOC emissions.</td>
<td></td>
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<tr>
<td>Foul Waste Water Systems</td>
<td>Rule 5 Requirement</td>
<td>Retention Period/Deadline to Submit</td>
<td>Federal, State or Local Laws and Permit Requirements</td>
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| Foul Waste Water Systems | Vapor emissions from foul wastewater tanks shall be captured and either scrubbed or thermally oxidized. | | *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).  
*Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.  
*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. | In order to maintain certifications held by Renessenz, such as ISO 9001, ISO 14001/Responsible Care, plant must have written operating procedures. Plant has developed draft general odor emission control procedure that incorporates foul waste water system operations. |
| Foul Waste Water Systems | Foul Waste Water shall be transferred through closed piping, any open head space in tanks vented to vapor collection system, treated separates from process waste water and treated with an oxidizing agent such as sodium hypochlorite or hydrogen peroxide. | | *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).  
*Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.  
*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints.  
*JECA Permit to Discharge to Publicly Owned Treatment Works (POTW) | |
| Thermal Oxidation Systems (Boilers and Incinerators) | TRS emissions from TO Systems shall be 1.0 ppm (v/v) or less. | | *Title V Permit requires performance tune-up of boilers, including maintaining records to demonstrate continuous compliance with permit requirements. Tune-up must be conducted while burning the type of fuel or fuels that have provided the majority of heat input over the period 12 months. Tune-up must be completed biennially. Tune-up must also include optimizing total CO emissions. A report for boiler tune-up must be maintained on site.  
*40 CFR Part 63.11223, Subpart JJJJJ.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).  
*Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.  
*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. | Title V Permit does not require stack testing for TRS emissions. Most recent stack testing conducted pursuant to Rule 5 on 9/18/2015 measured no TRS emissions. |
<table>
<thead>
<tr>
<th>Test Methods and Procedures</th>
<th>Rule 5 Requirement</th>
<th>Retention Period/Deadline to Submit</th>
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<tbody>
<tr>
<td><strong>Thermal Oxidation Systems</strong></td>
<td>Back-up TO System required.</td>
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<td>Renessenz operates a back-up boiler.</td>
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<tr>
<td>Stack testing for TRS emission concentrations from TO Systems must be conducted annually.</td>
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<td></td>
<td>Title V Permit does not require stack testing for TRS emissions. Most recent stack testing conducted pursuant to Rule 5 on 9/18/2015 measured no TRS emissions.</td>
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<tr>
<td><strong>Scrubber and Adsorbers</strong></td>
<td>Test methods must be established by facility ensure proper operation that may include testing scrubbing solution strength, test frequency and changing or recharging scrubbing solution to ensure continuous optimum odor emission reduction.</td>
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<td></td>
<td>Renessenz has one scrubber which is not utilized for control of TRS/CST emissions because railcars are unloaded under vacuum conditions.</td>
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<td>*Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors. *Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)). *Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors. *EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. *Preventative Maintenance Program</td>
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<td><strong>Recordkeeping Requirements</strong></td>
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<td><strong>Thermal Oxidation Systems</strong></td>
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<tr>
<td><strong>Vapor Incinerators</strong></td>
<td>Shall be monitored and recorded: combustion temperature (continuous), CO (continuous - if used for compliance determination) and bypass events.</td>
<td>2 years/Made Available Upon Request</td>
<td></td>
<td>Renessenz does not operate a thermal oxidizer to which this provision applies.</td>
</tr>
<tr>
<td><strong>Boilers</strong></td>
<td>Shall be monitored and recorded: CO (continuous - if used for compliance determination), unit shutdowns and bypass events.</td>
<td>2 years/Made Available Upon Request</td>
<td>*Title V Permit requires performance tune-up of boilers, including maintaining records to demonstrate continuous compliance with permit requirements. Tune-up must be conducted while burning the type of fuel or fuels that have provided the majority of heat input over the period 12 months. Tune-up must be completed biennially. Tune-up must include optimizing total CO emissions. A report for boiler tune-up must be maintained on site. *40 CFR Part 63.11223, Subpart JJIII.</td>
<td>Renessenz previously sent the EQD quarterly CO emissions monitoring reports when Renessenz was operating CEMS. CEMS was decrcommissioned fall 2014.</td>
</tr>
<tr>
<td>Scrubbers and Adsorbers</td>
<td>Rule 5 Requirement</td>
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|                        | Records shall be kept of each test of concentration and changing or recharging of scrubbing solution and details of odorous emissions shall be recorded. | 2 years/Made Available Upon Request | NOTE: Rule 5 says that scrubbing solution concentration tests and/or changing or recharging may be methods to demonstrate proper operation of scrubbers.  
*Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which cause or contribute to an objectionable odor (subparagraph (2)).  
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*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. | Renenessz has one scrubber which is not utilized for control of TRS/CST emissions because railcars are unloaded under vacuum conditions.  
Frequency Requested from EQD: No record of request before enforcement action associated with Citations 15-AP-04 and -05. |
| Reporting Requirements |                                                                                   |                                     |                                                                                                                         |                                                                                                                                       |
| Thermal Oxidation Systems | Stack testing for TRS emission concentrations: EQD must be given 15 days advance notice or test and results must be reported to EQD no later than 45 days after completion. | None.                              | *Title V Permit requires performance tune-up of boilers, including maintaining records to demonstrate continuous compliance with permit requirements.  
Tune-up must be conducted while burning the type of fuel or fuels that have provided the majority of heat input over the period 12 months. Tune-up must be completed biennially. Tune-up must include optimizing total CO emissions. A report for boiler tune-up must be maintained on site.  
*40 CFR Part 63.11223, Subpart JJJJJ. | Title V Permit does not require stack testing for TRS emissions.  
Most recent stack testing conducted pursuant to Rule 5 on 9/18/2015 measured no TRS emissions.  
Frequency Request to Witness Stack Testing: None. |
| Scrubbers and Adsorbers | "Test reports" shall be submitted upon request.                                    |                                     |                                                                                                                         | Renenessz has one scrubber which is not utilized for control of TRS/CST emissions because railcars are unloaded under vacuum conditions.  
Frequency Requested from EQD: No record of request before enforcement action associated with Citations 15-AP-04 and -05. |
<table>
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<th>Equipment in (CST or TRS) Liquic Service</th>
<th>Rule 5 Requirement</th>
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| Requires daily visual inspection of all pump seals for leaks and repair within 5 days after leak is discovered. | | None. | *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).  
*Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.  
*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. | Plant will continue daily housekeeping inspections of entire facility, which will include visual inspections for spills and leaks. |
| Requires monthly visual inspection of all sampling valves and open-ended valves/lines (e.g., safety relief valve line) for leaks and repair within 5 days after leak is discovered. | | None. | *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).  
*Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors.  
*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. | Plant will continue daily housekeeping inspections of entire facility, which will include visual inspections for spills and leaks. |
| Requires weekly monitoring of pressure relief valves and blowers/pressurized sections of vacuum pumps to ensure 1,000 ppm or less is measured and leaks repaired within 5 days after discovery. | | None. | *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).  
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<td>Monthly monitoring of open-ended valves or lines (e.g., safety relief valve line) and pressurized valve to ensure 1,000 ppm or less is measured and leaks repaired within 5 days after discovery.</td>
<td>None.</td>
<td>*Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.</td>
<td>Plant will continue daily housekeeping inspections of entire facility, which will include visual inspections for spills and leaks.</td>
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<tr>
<td>Delay of Repair</td>
<td>None.</td>
<td>*Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.</td>
<td>Rule 5 contains no provisions directing regulated entities to whom requests to delay repair should be made. Further, the rule provides that if the leak is “of such magnitude as to cause a detectable odor off of the plant property [it] must be repaired without delay.”</td>
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<td>EQD must approve repair of leaks that will take longer than 5 days and will only be allowed for equipment that is isolated and/or taken out of CST or TRS service and emissions from immediate repair exceed emissions during delay.</td>
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<td>*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph 2)).</td>
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<tr>
<td>Alternative Monitoring Schedule</td>
<td>None.</td>
<td>*Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.</td>
<td>Renessenz has requested the EDQ approve the use of its FLIR infrared (IR) camera to detect leaks rather than use of Reference Method 21 specified by Rule 5. The first request for the EDQ to observe use of the FLIR IR camera was made in March 2013.</td>
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<td>After three complete monthly checks, the company may request in writing that the EQD revise the monitoring schedule to reduce the frequency. If the EQD determines there are an excessive number of leaks, the EQD may require an increase in frequency. The EQD may approve an alternate monitoring method if the company can demonstrate that the alternate monitoring method is equivalent to the method required by the rule and the request must be made in writing.</td>
<td></td>
<td>*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph 2)).</td>
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<td>*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints.</td>
<td></td>
<td></td>
<td>Renessenz exceeded Rule 5 requirements by using the FLIR IR camera to detect leaks in liquid and vacuum operations.</td>
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<td>Test Methods and Procedures</td>
<td>Requires use of U.S. EPA Reference Method (RM) 21 to detect all leaking sources.</td>
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<td></td>
<td>2 years</td>
<td>Renessenz has requested the EDQ approve the use of its FLIR infrared (IR) camera to detect leaks rather than use of Reference Method 21 specified by Rule 5. The first request for the EDQ to observe use of the FLIR IR camera was made in March 2013. On September 10, 2015, Renessenz completed testing of potential leak sources in gaseous TRS service.</td>
</tr>
<tr>
<td>Recordkeeping Requirements</td>
<td>Requires each component subject to period (CST or TRS) leak detection inspection be: (i) identified by a permanent tag attached to the component; (ii) tagged with a weather proof/visible identification ta with the date leak was discovered (which can be removed after repair); (iii) maintain information for 2 year re: location of component, type of component, permanent tag number of component, date of leak, dated repaired, reading of instrument after leak repair and leaks unable to be repaired until shutdown.</td>
<td>2 years</td>
<td>None.</td>
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- *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.
- *Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)).
- *Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS occurs.

Plant will continue daily housekeeping inspections of entire facility, which will include visual inspections for spills and leaks.

Renessenz uses its SAP system to track equipment and components in CST or TRS systems subject to leak detection requirements. Use of the SAP system to track equipment and components will not change. The SAP system will continue to be used to maintain information regarding maintenance work orders, including work orders associated with leaks and repairs.
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<td>Calibration data for RM 21 monitoring instrument for each day of monitoring</td>
<td>2 years/Made Available Upon Request</td>
<td>Renessenz has requested the EDQ approve the use of its FLIR infrared (IR) camera to detect leaks rather than use of Reference Method 21 specified by Rule 5. The first request for the EDQ to observe use of the FLIR IR camera was made in March 2013. On September 10, 2015, Renessenz completed testing of potential leak sources in gaseous TRS service.</td>
<td></td>
</tr>
<tr>
<td>Reporting Requirements</td>
<td></td>
<td>None.</td>
<td>Plant will continue daily housekeeping inspections of entire facility, which will include visual inspections for spills and leaks. Renessenz uses its SAP system to track equipment and components in CST or TRS systems subject to leak detection requirements. Use of the SAP system to track equipment and components will not change. The SAP system will continue to be used to maintain information regarding maintenance work orders, including work orders associated with leaks and repairs.</td>
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| Semiannual reports to EQD identifying: (i) tag numbers of valves, pumps and blowers where leaks were detected, (ii) facts explaining any delay of repair beyond 5 days from discovery of leak and (iii) shutdown dates during reporting period. |                                    | *Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors.  
*Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph 2)).  
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*EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints. |                                                                                                                                 |
<p>| Housekeeping, Training, Maintenance and Tank Cleaning                              |                                    |                                                                                                                                 |                                                                                                                                 |
| General Housekeeping and Spills                                                    |                                    | Plant will continue reporting spills above RQ’s and off-site releases per SARA requirements. The plant has an Integrated Contingency Plan which incorporates the Spill Prevention, Control and Countermeasure (SPCC) plan and Storm Water Pollution Prevent Plan (SWPPP). | Requires spill log specifically for CST/TRS materials and requires tracking of quantities less than RQ. |
| Requires spill reports to EQD of: (i) TRS/CST materials &gt; 1 quart (less than reportable quantity (&quot;RQ&quot;)) recorded on spill log; and (ii) TRS/CST materials 710 gallons reported to EQD by phone with written report within 5 days. |                                    |                                                                                                                                 |                                                                                                                                 |</p>
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<td>Requires visual housekeeping inspection of all plan areas where TRS/CST substances are processed, handled or stored at least one time daily.</td>
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<td>*Title V Permit (Federal Clean Air Act; State managed program): Prohibits emissions of foul odors. *Florida Administrative Code section 62-296.320 - General Pollutant Emission Limiting Standards prohibits the discharge of air pollutants which case or contribute to an objectionable odor (subparagraph (2)). *Chapter 376 Ordinance Code - Odor Control: Gives Environmental Protection Board (EPB) power to regulate all objectionable odors including reduced sulfur compounds and TRS odors. *EPB Rule 1, Part VII: Establishes Procedures for Filing and Validating Citizen Odor Complaints.</td>
<td>Plant will continue daily housekeeping inspections of entire facility, which will include visual inspections for spills and leaks.</td>
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<td>Odor Abatement Manual &amp; Annual Training</td>
<td></td>
<td>Plant has prepared a proposed odor emission standard operating procedure to replace the Rule 5 odor abatement manual.</td>
<td>In order to maintain certifications held by Renessenz, such as ISO 9001, ISO 14001/Responsible Care, plant must have written operating procedures. Plant has developed draft general odor emission control procedure. Additionally, certifications require training of employees on written SOPs. Renessenz will continue to include odor emission procedure training as part of annual Environmental Bootcamp training.</td>
</tr>
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NOTE1: This chart does not address alternative CO monitoring using a Continuous Emission Monitor System (CEMS) because neither Renessenz, LLC nor IFF uses CEMS.