



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL  
BUTLER COUNTY**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 14-05515**

**DATE: 4/8/2004**

Miller Brewing Company  
Mark Koch  
2525 Wayne Madison Road  
Trenton, OH 45067-9760

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05515 FOR AN AIR CONTAMINANT SOURCE FOR MILLER BREWING COMPANY**

On 4/8/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Miller Brewing Company**, located at **2525 Wayne Madison Road, Trenton Ohio**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05515:

**8.5 MW Steam Turbine Generator Project - Modification to PTI 14-05143, issued 11/15/2001.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and  
Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-05515**

Application Number: 14-05515  
APS Premise Number: 1409000353  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Miller Brewing Company  
Person to Contact: Mark Koch  
Address: 2525 Wayne Madison Road  
Trenton, OH 45067-9760

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2525 Wayne Madison Road  
Trenton Ohio, Ohio**

Description of proposed emissions unit(s):  
**8.5 MW Steam Turbine Generator Project - Modification to PTI 14-05143, issued 11/15/2001.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Miller Brewing Company

Facility ID: 1409000353

PTI Application: 14-05515

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally

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applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

**Miller Brewing Company**

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3745-77-08(C)(3)(d).

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- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**12. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

Miller Brewing Company

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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**5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**7. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally**

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**Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	122.9
PM10	122.9
NOx	1375.9
VOC	23.0
CO	175.2
SO2	2758.0
HCl	187.6
HF	17.7

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## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

#### MACT "Hammer" Requirements

1. The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial/Commercial/Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.
2. If the final NESHAP standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard or by May 15, 2003, whichever is later. It must contain the following information, unless otherwise specified by future U.S. EPA regulations:
  - a. for a new affected source, the anticipated date of startup of operation;
  - b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
  - c. any existing federal, State, or local limitations or requirements applicable to the affected source;
  - d. for each affected emission point or group of affected emission points, an identification of control technology in place;
  - e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
  - f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

The Part II application for a MACT determination may, but is not required to, contain the following information:

- a. recommended emission limitations for the affected source and support information (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);
- b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and

Emissions Unit ID: B001

- c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
3. If the NESHAP is promulgated before the Part II application is due for the relevant source category, the permittee may be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. If subject, the permittee shall submit the following notifications:
  - a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
    - i. the name and mailing address of the permittee;
    - ii. the physical location of the source if it is different from the mailing address;
    - iii. identification of the relevant MACT standard and the source's compliance date;
    - iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
    - v. a statement confirming the facility is a major source for HAPs.
  - b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:
    - i. the methods used to determine compliance;
    - ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;
    - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
    - iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;
    - v. an analysis demonstrating whether the affected source is a major source or an area source;
    - vi. a description of the air pollution control equipment or method for each emission

**Miller**

**PTI A**

Emissions Unit ID: B001

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point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

- vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Miller  
PTI A

Emissions Unit ID: B001

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

B001 - 238 mmBtu/hr  
pulverized coal/fuel  
oil/natural gas-fired boiler  
with baghouse and steam  
turbine - Modification

OAC rule 3745-31-05(A)(3)

	Applicable Emissions Limitations/Control Measures	Emissions Unit ID: B001
OAC rule 3745-18-15(O)(1)	See A.I.2.b. (BAT also includes the requirements of these rules)  Limits when Burning Coal: 0.031 lb PM-PM10/MMBtu 0.01 gr PM/acf 0.7 lb NOx/MMBtu 0.62 lb VOC/hr 5.2 lbs CO/hr 1.6 lbs SO2/MMBtu 21.4 lbs HCl/hr 1.6 lbs HF/hr	rolling, 12-month summation: 11.5 TPY VOC (based on natural gas) 87.6 TPY CO (based on natural gas)  Combined limits for emissions units B001 and B002, when burning any combination of fuels, based on a rolling, 12-month summation: 122.9 TPY PM-PM10 187.6 TPY HCl 17.7 TPY HF
OAC rules 3745-31-10 through 20	Limits when Burning No. 6 Oil: 0.125 lb PM-PM10/MMBtu (based on total heat input of 476 MMBtu/hr for B001 & B002) 0.01 gr PM/acf 0.7 lb NOx/MMBtu 1.2 lbs VOC/hr 8.15 lbs CO/hr 1.6 lbs SO2/MMBtu	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20, OAC rule 3745-18-15(O)(1), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC rule 3745-17-10(C)(1), and 3745-23-06(B).  1.6 lbs SO2/MMBtu actual heat input for emissions unit B001
OAC rule 3745-17-07(A)(1)	Limits when Burning No. 2 Oil: 0.020 lb PM-PM10/MMBtu 0.01 gr PM/acf 0.7 lb NOx/MMBtu 0.38 lb VOC/hr 8.5 lbs CO/hr 1.6 lbs SO2/MMBtu	2758.0 TPY SO2* (to meet modeling requirements) 1375.9 TPY NOx* *Combined limits for emissions units B001 and B002, when burning any combination of fuels, based on a rolling, 12-month summation.
OAC rule 3745-17-10(B)(1)		
OAC rule 3745-17-10(C)(1)	While Burning Natural Gas: 0.020 lb PM-PM10/MMBtu 0.01 gr PM/acf 0.7 lb NOx/MMBtu 2.6 lbs VOC/hr 20.0 lbs CO/hr 1.6 lbs SO2/MMBtu	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
OAC rule 3745-23-06(B)	Maximum allowable emissions for emissions unit B001 based on a	0.020 lb of PM/MMBtu of actual heat input when burning No. 2 fuel oil or natural gas

**Miller****PTI A**

Emissions Unit ID: B001

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0.125 lb PM/MMBtu when  
burning No. 6 fuel oil (based  
on a total heat input of 476  
mmBtu/hr)

See term A.II.1.

**2. Additional Terms and Conditions**

- 2.a** Particulate emissions shall not exceed 0.031 lb/MMBtu of actual heat input when burning coal and 0.01 grains/actual cubic feet of exhaust gases.
- 2.b** Nitrogen oxide emissions shall not exceed 0.7 lb. NO<sub>x</sub>/MMBtu actual heat input. This limit is based on a review by U.S. EPA of the performance test for emissions unit B001, which indicated that the 0.6 lb NO<sub>x</sub> per MMBtu emission limit in PSD permit 5-79-A-28 cannot be attained and maintained.
- 2.c** The tons per year sulfur dioxide emission limitation was set to comply with the PSD modeling requirements.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, fuel quality restrictions, operating rate restrictions, use of a fabric filter, recordkeeping, compliance with NAAQS and PSD pollutant impact modeling.
- 2.e** The hourly emission limitation(s) for CO, VOC, HCl, and HF, outlined in term A.I.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

**II. Operational Restrictions**

- 1. The emissions unit shall utilize the manufacturer's best design for minimizing NO<sub>x</sub> emissions. The design shall utilize overfire and side fire air to reduce flame temperature and limit combustion air (ref. PSD 5-79-A-23 FR Vol 44 No. 215 issued Nov. 5, 1979).
- 2. The daily average operating rate for this emissions unit shall not exceed 238 MMBtu/hour and 180,000 pounds of steam per hour.
- 3. The quality of coal burned in this emissions unit shall meet the following specification on an

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as-burned basis:

- a. A combination of ash content and heat content sufficient to comply with the particulate emission limitations specified in terms A.I.1. and A.I.2.
- b. A combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/MMBTU of actual heat input.

Compliance with the above mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month.

4. The quality of the fuel oil(s) burned in this emissions unit shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified in section A.I.1. above.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.

The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:

- a. A combination of ash content and heat content sufficient to comply with the particulate emission limitation of 0.020 lb PM/MMBtu when burning No. 2 fuel oil and 0.125 lb PM/MMBtu when burning No. 6 fuel oil.
- b. A combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/MMBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month and/or stack gas sampling using methods specified in 40 CFR 60, Section 60.46.

5. The pressure drop across the baghouse shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.
6. The combined maximum annual coal usage rate for emissions units B001 and B002 shall not exceed 125,682 tons per year, based upon a rolling, 12-month summation of the coal usage rate.

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The permittee has existing records to demonstrate compliance with this permit limit.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect representative grab samples of the coal burned in this emissions unit from each shipment of coal received for burning. Representative samples may be obtained via composite sampling from the coal handling system. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, and the average SO<sub>2</sub> emission rate for the month, in lbs/MMBtu of actual heat input.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).] A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM methods D240, D4294), or equivalent methods as approved by the Director.

The permittee shall maintain records of the oil burned in this emissions unit in accordance the following:

Emissions Unit ID: B001

## a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).] A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

## b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emission unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit.

A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing". The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).]

3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis.
4. The permittee shall maintain daily records of the following information:
  - a. the heat input for this emissions unit, in MMBtu/hr
  - b. the hours of operation for this emissions unit; and
  - c. the daily average operating rate, in MMBtu/hr, for this emissions unit.

To determine heat input, the permittee shall properly operate and maintain existing equipment to continuously monitor and record the steam load, in pounds/hour, from this emissions unit.

The permittee shall maintain a written quality assurance/quality control plan for the continuous steam load monitoring system designed to ensure continuous valid and representative readings of steam load, in pounds of steam/hour. The plan shall include a description of preventive

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maintenance activities. A logbook dedicated to the continuous steam monitoring system must be kept on site and be available for inspection during regular office hours.

5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PM from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
6. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The usage rates for each fuel (natural gas, No. 2 fuel oil No. 6 fuel oil, and coal) burned in this emissions unit
  - b. The rolling, 12-month summation of the natural gas, No. 2 fuel oil, No. 6 fuel oil, and coal usage rates.
  - c. The rolling, 12-month summation of the coal usage rate for emissions unit B001 and B002 combined.
7. The permittee shall maintain monthly records of the following information for this emissions unit in order to monitor compliance with the rolling, 12-month summation emissions limitations:
  - a. the total emissions, in tons, for VOC and CO when burning any combination of fuels;
  - b. the rolling, 12-monthly summation emissions total, in tons, for VOC and CO when burning any combination of fuels (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).
8. The permittee shall maintain monthly records of the following information for emission units B001 and B002, combined, in order to monitor compliance with the rolling, 12-month summation emissions limitations:
  - a. the total emissions, in tons, for SO<sub>2</sub>, NO<sub>x</sub>, PM/PM<sub>10</sub>, HCl, and HF when burning any combination of fuels;

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- b. the rolling, 12-monthly summation emissions total, in tons, for SO<sub>2</sub>, NO<sub>x</sub>, PM/PM<sub>10</sub>, HCl, and HF when burning any combination of fuels (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

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- a. the total quantity of coal received (tons);
- b. the average ash content (percent) of the coal received;
- c. the average sulfur content (percent) of the coal received;
- d. the average heat content (Btu/pound) of the coal received; and
- e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/MMBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur content (percent) for the oil received during each calendar month;
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during each calendar month; and
  - d. the weighted\* average SO<sub>2</sub> emission rate (lbs/MMBtu of actual heat input) of the oil combusted during each calendar month.

\*In proportion to the quantity of oil received in each shipment during each calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.5.
4. The permittee shall submit quarterly reports that identify all exceedances of the rolling, 12-month

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SO<sub>2</sub> emissions limitation and the rolling, 12-month summation of the coal usage rate for emissions unit B001 and B002 combined.

5. The permittee shall also submit annual reports which specify the total PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, HCl, and HF emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
6. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all periods of time during which the steam load exceeded 180,000 lbs of steam per hour, and
  - b. all periods of time during which the daily average operating rate exceeded 238 MMBtu/hr.
7. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by February 15 and August 15 of each year and shall cover the previous 6-month period.
8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
9. Within 120 days after promulgation of 40 CFR 63 Subpart DDDDD, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
  - a. The name and mailing address of the permittee;
  - b. The physical location of the source if it is different from the mailing address;
  - c. Identification of the relevant MACT standard and the permittee's compliance date;
  - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
  - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart DDDDD, the permittee shall submit a notification of compliance status that contains the following information:

- a. The methods used to determine compliance;
- b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
- c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart DDDDD;
- e. An analysis demonstrating whether the affected source is a major source or an area source;
- f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart DDDDD.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions limitation: Visible PM shall not exceed 20 percent opacity, as a 6-minute average.  
  
 Compliance Method: If required, compliance shall be demonstrated by the methods specified in 40 CFR 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitations:  
 0.031 lb of PM/MMBtu of actual heat input and 0.01 grain per actual cubic foot when burning coal.  
  
 Applicable Compliance Method:  
 The permittee shall demonstrate compliance with the above PM emission limitations based upon the results of emission testing required in Section V.2 of this permit.
  - c. Emission Limitation:  
 0.020 lb of PM/MMBtu of actual heat input when burning either No. 2 fuel oil or natural gas  
  
 Applicable Compliance Method:  
 For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PM/MM cu. ft, and

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then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PM/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- d. Emission Limitation:  
0.125 lb of PM/MMBtu of actual heat input (based on total heat input of 476 MMBtu/hr for B001 and B002 combined) when burning No. 6 fuel oil

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PM/1000 gallons, and then dividing by the maximum hourly heat input capacity of the combined emissions units B001 and B002 (MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- e. Emission Limitation:  
0.7 lb of NOx/MMBtu of actual heat input when burning coal

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above NOx emission limitation based upon the results of emission testing required in Section V.2 of this permit.

- f. Emission Limitation:  
1.6 lbs of SO<sub>2</sub>/MMBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and record keeping requirements in Section A.III.1 and A.III.2 and the reporting keeping requirements in Section A.IV.1 and A.IV.2 of this

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permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO<sub>2</sub> emission rate is the sum of SO<sub>2</sub> from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

- g. Emission Limitation:  
0.62 lbs VOC/hr, when burning coal  
1.2 lbs VOC/hr, when burning No. 6 oil  
0.38 lbs VOC/hr, when burning No. 2 oil  
2.6 lbs VOC/hr, when burning natural gas

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and related emission factors found in AP-42, Fifth Edition, Section 1. External Combustion Sources, dated 1998.

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation through emission tests performed in accordance with Methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation:  
5.2 lbs CO/hr, when burning coal  
8.15 lbs CO/hr, when burning No. 6 oil  
8.5 lbs CO/hr, when burning No. 2 oil  
20.0 lbs CO/hr, when burning natural gas

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and related emission factors found in AP-42, Fifth Edition, Section 1. External Combustion Sources, dated 1998.

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

- i. Emission Limitation:  
21.4 lbs HCl/hr, when burning coal

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and the permittee's emissions data and technical analysis found in the application for PTI 14-05515, submitted November 24, 2003.

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If required, the permittee shall demonstrate compliance with the hourly HCl emission limitation through emission tests performed in accordance with Methods 1-4 and 26 of 40 CFR Part 60, Appendix A.

- j. Emission Limitation:  
1.6 lbs HF/hr, when burning coal

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and related emission factors found in AP-42, Fifth Edition, Section 1. External Combustion Sources, Table 1.1-15, dated 1998.

If required, the permittee shall demonstrate compliance with the hourly HF emission limitation through emission tests performed in accordance with Methods 1-4 and 26A of 40 CFR Part 60, Appendix A.

- k. Emission Limitation(s):  
11.5 tons of VOC emissions per rolling, 12-month period  
87.6 tons of CO emissions per rolling, 12-month period

Applicable Compliance Method: Compliance with the VOC and CO emission limitations specified above shall be determined by the record keeping requirements specified in Section A.III.7.

- l. Emission Limitation(s):  
The total emissions from emissions units B001 and B002 combined shall not exceed the following emission limitations:

- i. 2758.0 tons of SO<sub>2</sub> emissions per rolling, 12-month period;
- ii. 1375.9 tons of NO<sub>x</sub> emissions per rolling, 12-month period;
- iii. 122.9 tons of PM/PM<sub>10</sub> emissions per rolling, 12-month period;
- iv. 187.6 tons of HCl emissions per rolling, 12-month period; and
- v. 17.7 tons of HF emissions per rolling, 12-month period.

Applicable Compliance Method: Compliance with the SO<sub>2</sub>, NO<sub>x</sub>, PM/PM<sub>10</sub>, HCl, and HF emission limitations specified above shall be determined by the record keeping requirements specified in Section A.III.8.

2. If not previously conducted and reported, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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- a. The emission testing shall be conducted within six months after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate of 0.031 lb PM/MMBtu, 0.01 gr/acf of exhaust gases, and for NO<sub>x</sub> of 0.7 lb/MMBtu when burning coal.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  
  
Method 5 of 40 CFR Part 60, Appendix A for particulate, and;  
Method 7 of 40 CFR Part 60, Appendix A for NO<sub>x</sub>.  
  
Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
- d. During the test, the temperature, the pressure drop across the baghouse, and the steam load shall be recorded at least every 15 minutes.
- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with term A.II.5 shall be demonstrated by the record keeping in term A.III.3.

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4. Compliance with term A.II.6 shall be demonstrated by the record keeping in term A.III.6.
5. Compliance with term A.II.2 shall be demonstrated by the record keeping in term A.III.4.

**VI. Miscellaneous Requirements**

1. The terms and conditions listed in this permit to install for this emissions unit shall supercede the air pollution control requirements for this emissions unit contained in permit to install 14-05143 as issued on November 15, 2001.

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**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B001 - 238 mmBtu/hr pulverized coal/fuel oil/natural gas-fired boiler with baghouse and steam turbine - Modification		See term III.1

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit B001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: HCl (Hydrogen Chloride)

TLV (ug/m3): 2983.0

Maximum Hourly Emission Rate (lbs/hr): 42.8 (B001 and B002)

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 30.84

MAGLC (ug/m3): 71.02

Pollutant: HF (Hydrogen Fluoride)

TLV (ug/m3): 2455.0

Maximum Hourly Emission Rate (lbs/hr): 3.1 (B001 and B002)

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2.2

MAGLC (ug/m3): 58.5

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased

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exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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PTI A

Emissions Unit ID: B002

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B002 - 238 mmBtu/hr pulverized coal/fuel oil/natural gas-fired boiler with baghouse and steam turbine - Modification	OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: B002

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		Applicable Emissions <u>Limitations/Control Measures</u>
	OAC rule 3745-23-06(B)	
		See A.I.2.b. (BAT also includes the requirements of these rules)
OAC rule 3745-18-15(O)(1)		Limits when Burning Coal: 0.031 lb PM-PM10/MMBtu 0.01 gr PM/acf 0.7 lb NO <sub>x</sub> /MMBtu 0.62 lb VOC/hr 5.2 lbs CO/hr 1.6 lbs SO <sub>2</sub> /MMBtu 21.4 lbs HCl/hr 1.6 lbs HF/hr
OAC rules 3745-31-10 through 20		Limits when Burning No. 6 Oil: 0.125 lb PM-PM10/MMBtu (based on total heat input of 476 MMBtu/hr for B001 & B002) 0.01 gr PM/acf 0.7 lb NO <sub>x</sub> /MMBtu 1.2 lbs VOC/hr 8.15 lbs CO/hr 1.6 lbs SO <sub>2</sub> /MMBtu
OAC rule 3745-17-07(A)(1)		Limits when Burning No. 2 Oil: 0.020 lb PM-PM10/MMBtu 0.01 gr PM/acf 0.7 lb NO <sub>x</sub> /MMBtu 0.38 lb VOC/hr 8.5 lbs CO/hr 1.6 lbs SO <sub>2</sub> /MMBtu
OAC rule 3745-17-10(B)(1)		
OAC rule 3745-17-10(C)(1)		While Burning Natural Gas: 0.020 lb PM-PM10/MMBtu 0.01 gr PM/acf 0.7 lb NO <sub>x</sub> /MMBtu 2.6 lbs VOC/hr

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20.0 lbs CO/hr

1.6 lbs SO<sub>2</sub>/MMBtu

Maximum allowable emissions for emissions unit B002 based on a rolling, 12-month summation:

11.5 TPY VOC (based on natural gas)

87.6 TPY CO (based on natural gas)

Combined limits for emissions units B001 and B002, when burning any combination of fuels, based on a rolling, 12-month summation:

122.9 TPY PM-PM<sub>10</sub>

187.6 TPY HCl

17.7 TPY HF

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20, OAC rule 3745-18-15(O)(1), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC rule 3745-17-10(C)(1), and 3745-23-06(B).

1.6 lbs SO<sub>2</sub>/MMBtu actual heat input for emissions unit B002

2758.0 TPY SO<sub>2</sub>\* (to meet

modeling requirements)

1375.9 TPY NO<sub>x</sub>\*

\*Combined limits for emissions units B001 and B002, when burning any combination of fuels, based on a rolling, 12-month summation.

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

0.020 lb of PM/MMBtu of actual heat input when burning No. 2 fuel oil or natural gas

0.125 lb PM/MMBtu when burning No. 6 fuel oil (based on a total heat input of 476 mmBtu/hr)

See term A.II.1.

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- 2.a** Particulate emissions shall not exceed 0.031 lb/MMBtu of actual heat input when burning coal and 0.01 grains/actual cubic feet of exhaust gases.
- 2.b** Nitrogen oxide emissions shall not exceed 0.7 lb. NO<sub>x</sub>/MMBtu actual heat input. This limit is based on a review by U.S. EPA of the performance test for emissions unit B002, which indicated that the 0.6 lb NO<sub>x</sub> per MMBtu emission limit in PSD permit 5-79-A-28 cannot be attained and maintained.
- 2.c** The tons per year sulfur dioxide emission limitation was set to comply with the PSD modeling requirements.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, fuel quality restrictions, operating rate restrictions, use of a fabric filter, recordkeeping, compliance with NAAQS and PSD pollutant impact modeling.
- 2.e** The hourly emission limitation(s) for CO, VOC, HCl, and HF, outlined in term A.I.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

**II. Operational Restrictions**

- 1. The emissions unit shall utilize the manufacturer's best design for minimizing NO<sub>x</sub> emissions. The design shall utilize overfire and side fire air to reduce flame temperature and limit combustion air (ref. PSD 5-79-A-23 FR Vol 44 No. 215 issued Nov. 5, 1979).
- 2. The daily average operating rate for this emissions unit shall not exceed 238 MMBtu/hour and 180,000 pounds of steam per hour.
- 3. The quality of coal burned in this emissions unit shall meet the following specification on an as-burned basis:
  - a. A combination of ash content and heat content sufficient to comply with the particulate emission limitations specified in terms A.I.1. and A.I.2.
  - b. A combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/MMBTU of actual heat input.

Compliance with the above mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all

Emissions Unit ID: B002

shipments of coal during each calendar month.

4. The quality of the fuel oil(s) burned in this emissions unit shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified in section A.I.1. above.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.

The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:

- a. A combination of ash content and heat content sufficient to comply with the particulate emission limitation of 0.020 lb PM/MMBtu when burning No. 2 fuel oil and 0.125 lb PM/MMBtu when burning No. 6 fuel oil.
- b. A combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/MMBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month and/or stack gas sampling using methods specified in 40 CFR 60, Section 60.46.

5. The pressure drop across the baghouse shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.
6. The combined maximum annual coal usage rate for emissions units B001 and B002 shall not exceed 125,682 tons per year, based upon a rolling, 12-month summation of the coal usage rate.

The permittee has existing records to demonstrate compliance with this permit limit.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect representative grab samples of the coal burned in this emissions unit from each shipment of coal received for burning. Representative samples may be obtained via composite sampling from the coal handling system. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke;

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ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, and the average SO<sub>2</sub> emission rate for the month, in lbs/MMBtu of actual heat input.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).] A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM methods D240, D4294), or equivalent methods as approved by the Director.

The permittee shall maintain records of the oil burned in this emissions unit in accordance the following:

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).] A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit

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for each day when the emission unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit.

A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing". The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).]

3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis.
4. The permittee shall maintain daily records of the following information:
  - a. the heat input for this emissions unit,
  - b. the hours of operation for this emissions unit; and
  - c. the daily average operating rate, in MMBtu/hr, for this emissions unit.

To determine heat input, the permittee shall properly operate and maintain existing equipment to continuously monitor and record the steam load, in pounds/hour, from this emissions unit.

The permittee shall maintain a written quality assurance/quality control plan for the continuous steam load monitoring system designed to ensure continuous valid and representative readings of steam load, in pounds of steam/hour. The plan shall include a description of preventive maintenance activities. A logbook dedicated to the continuous steam monitoring system must be kept on site and be available for inspection during regular office hours.

5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PM from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
6. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. The usage rates for each fuel (natural gas, No. 2 fuel oil No. 6 fuel oil, and coal) burned in this emissions unit
  - b. The rolling, 12-month summation of the natural gas, No. 2 fuel oil, No. 6 fuel oil, and coal usage rates.
  - c. The rolling, 12-month summation of the coal usage rate for emissions unit B001 and B002 combined.
7. The permittee shall maintain monthly records of the following information for this emissions unit in order to monitor compliance with the rolling, 12-month summation emissions limitations:
- a. the total emissions, in tons, for VOC and CO when burning any combination of fuels;
  - b. the rolling, 12-monthly summation emissions total, in tons, for VOC and CO when burning any combination of fuels (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).
8. The permittee shall maintain monthly records of the following information for emission units B001 and B002, combined, in order to monitor compliance with the rolling, 12-month summation emissions limitations:
- a. the total emissions, in tons, for SO<sub>2</sub>, NO<sub>x</sub>, PM/PM<sub>10</sub>, HCl, and HF when burning any combination of fuels;
  - b. the rolling, 12-monthly summation emissions total, in tons, for SO<sub>2</sub>, NO<sub>x</sub>, PM/PM<sub>10</sub>, HCl, and HF when burning any combination of fuels (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

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- a. the total quantity of coal received (tons);
- b. the average ash content (percent) of the coal received;
- c. the average sulfur content (percent) of the coal received;
- d. the average heat content (Btu/pound) of the coal received; and
- e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/MMBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur content (percent) for the oil received during each calendar month;
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during each calendar month; and
  - d. the weighted\* average SO<sub>2</sub> emission rate (lbs/MMBtu of actual heat input) of the oil combusted during each calendar month.

\*In proportion to the quantity of oil received in each shipment during each calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.5.
4. The permittee shall submit quarterly reports that identify all exceedances of the rolling, 12-month

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SO<sub>2</sub> emissions limitation and the rolling, 12-month summation of the coal usage rate for emissions unit B001 and B002 combined.

5. The permittee shall also submit annual reports which specify the total PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, HCl, and HF emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
6. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all periods of time during which the steam load exceeded 180,000 lbs of steam per hour, and
  - b. all periods of time during which the daily average operating rate exceeded 238 MMBtu/hr.
7. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by February 15 and August 15 of each year and shall cover the previous 6-month period.
8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
9. Within 120 days after promulgation of 40 CFR 63 Subpart DDDDD, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
  - a. The name and mailing address of the permittee;
  - b. The physical location of the source if it is different from the mailing address;
  - c. Identification of the relevant MACT standard and the permittee's compliance date;
  - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
  - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart DDDDD, the permittee shall submit a notification of compliance status that contains the following information:

- a. The methods used to determine compliance;
- b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

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- c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart DDDDD;
- e. An analysis demonstrating whether the affected source is a major source or an area source;
- f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart DDDDD.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions limitation: Visible PM shall not exceed 20 percent opacity, as a 6-minute average.  
  
Compliance Method: If required, compliance shall be demonstrated by the methods specified in 40 CFR 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitations:  
0.031 lb of PM/MMBtu of actual heat input and 0.01 grain per actual cubic foot when burning coal.  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the above PM emission limitations based upon the results of emission testing required in Section V.2 of this permit.
  - c. Emission Limitation:  
0.020 lb of PM/MMBtu of actual heat input when burning either No. 2 fuel oil or natural gas  
  
Applicable Compliance Method:  
For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PM/MM cu. ft, and

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then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PM/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- d. Emission Limitation:  
0.125 lb of PM/MMBtu of actual heat input (based on total heat input of 476 MMBtu/hr for B001 and B002 combined) when burning No. 6 fuel oil

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PM/1000 gallons, and then dividing by the maximum hourly heat input capacity of the combined emissions units B001 and B002 (MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- e. Emission Limitation:  
0.7 lb of NO<sub>x</sub>/MMBtu of actual heat input when burning coal

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above NO<sub>x</sub> emission limitation based upon the results of emission testing required in Section V.2 of this permit.

- f. Emission Limitation:  
1.6 lbs of SO<sub>2</sub>/MMBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and record keeping requirements in Section A.III.1 and A.III.2 and the reporting keeping requirements in Section A.IV.1 and A.IV.2 of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO<sub>2</sub> emission rate is the sum of SO<sub>2</sub> from all fuels burned divided by the sum of the Btu value of all fuels burned.

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If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

- g. Emission Limitation:  
0.62 lbs VOC/hr, when burning coal  
1.2 lbs VOC/hr, when burning No. 6 oil  
0.38 lbs VOC/hr, when burning No. 2 oil  
2.6 lbs VOC/hr, when burning natural gas

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and related emission factors found in AP-42, Fifth Edition, Section 1. External Combustion Sources, dated 1998.

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation through emission tests performed in accordance with Methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation:  
5.2 lbs CO/hr, when burning coal  
8.15 lbs CO/hr, when burning No. 6 oil  
8.5 lbs CO/hr, when burning No. 2 oil  
20.0 lbs CO/hr, when burning natural gas

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and related emission factors found in AP-42, Fifth Edition, Section 1. External Combustion Sources, dated 1998.

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

- i. Emission Limitation:  
21.4 lbs HCl/hr, when burning coal

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and the permittee's emissions data and technical analysis found in the application for PTI 14-05515, submitted November 24, 2003.

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If required, the permittee shall demonstrate compliance with the hourly HCl emission limitation through emission tests performed in accordance with Methods 1-4 and 26 of 40 CFR Part 60, Appendix A.

- j. Emission Limitation:  
1.6 lbs HF/hr, when burning coal

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and related emission factors found in AP-42, Fifth Edition, Section 1. External Combustion Sources, Table 1.1-15, dated 1998.

If required, the permittee shall demonstrate compliance with the hourly HF emission limitation through emission tests performed in accordance with Methods 1-4 and 26A of 40 CFR Part 60, Appendix A.

- k. Emission Limitation(s):  
11.5 tons of VOC emissions per rolling, 12-month period  
87.6 tons of CO emissions per rolling, 12-month period

Applicable Compliance Method: Compliance with the VOC and CO emission limitations specified above shall be determined by the record keeping requirements specified in Section A.III.7.

- l. Emission Limitation(s):  
The total emissions from emissions units B001 and B002 combined shall not exceed the following emission limitations:

- i. 2758.0 tons of SO<sub>2</sub> emissions per rolling, 12-month period;
- ii. 1375.9 tons of NO<sub>x</sub> emissions per rolling, 12-month period;
- iii. 122.9 tons of PM/PM<sub>10</sub> emissions per rolling, 12-month period;
- iv. 187.6 tons of HCl emissions per rolling, 12-month period; and
- v. 17.7 tons of HF emissions per rolling, 12-month period.

Applicable Compliance Method: Compliance with the SO<sub>2</sub>, NO<sub>x</sub>, PM/PM<sub>10</sub>, HCl, and HF emission limitations specified above shall be determined by the record keeping requirements specified in Section A.III.8.

2. If not previously conducted and reported, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within six months after issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable

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mass emission limit for particulate of 0.031 lb PM/MMBtu, 0.01 gr/acf of exhaust gases, and for NOx of 0.7 lb/MMBtu when burning coal.

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 5 of 40 CFR Part 60, Appendix A for particulate, and;  
Method 7 of 40 CFR Part 60, Appendix A for NOx.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

- d. During the test, the temperature, the pressure drop across the baghouse, and the steam load shall be recorded at least every 15 minutes.
- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

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3. Compliance with term A.II.5 shall be demonstrated by the record keeping in term A.III.3.
4. Compliance with term A.II.6 shall be demonstrated by the record keeping in term A.III.6.
5. Compliance with term A.II.2 shall be demonstrated by the record keeping in term A.III.4.

#### **VI. Miscellaneous Requirements**

1. The terms and conditions listed in this permit to install for this emissions unit shall supercede the air pollution control requirements for this emission unit contained in permit to install 14-05143 as issued on November 15, 2001.

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B002 - 238 mmBtu/hr pulverized coal/fuel oil/natural gas-fired boiler with baghouse and steam turbine - Modification		See term III.1

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit B002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: HCl (Hydrogen Chloride)

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TLV (ug/m3): 2983.0

Maximum Hourly Emission Rate (lbs/hr): 42.8 (B001 and B002)

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 30.84

MAGLC (ug/m3): 71.02

Pollutant: HF (Hydrogen Fluoride)

TLV (ug/m3): 2455.0

Maximum Hourly Emission Rate (lbs/hr): 3.1 (B001 and B002)

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2.2

MAGLC (ug/m3): 58.5

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased

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exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None