John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

12/16/2014

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mark Koch
MillerCoors LLC
2525 WAYNE MADISON ROAD
TRENTON, OH 45067-9760

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1409000353
Permit Number: P0117835
Permit Type: Administrative Modification
County: Butler

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

Butler County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
MillerCoors LLC

Issue Date: 12/16/2014
Permit Number: P0117835
Permit Type: Administrative Modification
Permit Description: Administrative modification to apply federally enforceable operating restrictions to qualify for limited use boilers under 40 CFR Part 63, Subpart DDDDD.
Facility ID: 1409000353
Facility Location: MillerCoors LLC
2525 WAYNE MADISON ROAD,
Trenton, OH 45067-9760
Facility Description: Breweries

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
MillerCoors LLC

Facility ID:	1409000353
Permit Number:	P0117835
Permit Type:	Administrative Modification
Issued:	12/16/2014
Effective:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install
for
MillerCoors LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 8
9. Reporting Requirements 8
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 10
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 14
1. Emissions Unit Group - Boilers No. 1 and No. 2: B001, B002 15

Authorization

Facility ID:	1409000353
Facility Description:	Manufacturing and packaging of malt beverages
Application Number(s):	M0003058
Permit Number:	P0117835
Permit Description:	Administrative modification to apply federally enforceable operating restrictions to qualify for limited use boilers under 40 CFR Part 63, Subpart DDDDD.
Permit Type:	Administrative Modification
Permit Fee:	$1,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	12/16/2014
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

MillerCoors LLC
2525 WAYNE MADISON ROAD
Trenton, OH 45067-9760

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0117835
Permit Description: Administrative modification to apply federally enforceable operating restrictions to qualify for limited use boilers under 40 CFR Part 63, Subpart DDDDD.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Boilers No. 1 and No. 2

Emissions Unit ID:	**B001**
Company Equipment ID:	BOILER NO.1
Superseded Permit Number:	P0111979
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**B002**
Company Equipment ID:	BOILER NO. 2
Superseded Permit Number:	P0111979
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) 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 re-issuance, or modification.

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, 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 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.

4. Monitoring and Related Record Keeping 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:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Southwest Ohio Air Quality Agency. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Southwest Ohio Air Quality Agency every six months, 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 theSouthwest Ohio Air Quality Agencyin 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).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

(1) 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.

(2) 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.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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 Southwest Ohio Air Quality 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Southwest Ohio Air Quality 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 theSouthwest Ohio Air Quality 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, 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources Industrial, Commercial, and Institutional Boilers: B001 and B002. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

3. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, B002, B003, B004, B007, B010, B011, F001, F003, F004, P030, P031, P032, P033, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units, or future constructed emissions units, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

4. The permittee shall collect and record the following information each month for the emissions units identified in 3.:

   a) the name and identification number of each HAP containing material employed (if applicable);

   b) the identification of each individual HAP contained in each material employed (if applicable);

   c) the HAP emission factor for each individual HAP and each type of operation;

   d) the total individual HAP emissions for each HAP from all sources, in pounds or tons per month;

   e) the total combined HAP emissions from all sources, in pounds or tons per month [the summation of the individual HAP emissions from d) above];

   f) the updated rolling, 12-month summation of the individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

   g) the updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

   * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

5. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations outlined in 3. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year

and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

6. Emission Limitations:

HAP emissions shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling, 12-month summation for the emissions units listed in 3.

Applicable Compliance Method:

Compliance with the HAP emission limitations in 3.shall be demonstrated by the record keeping requirements specified in 4.

7. The following abbreviations are used throughout this permit:

NOx = Nitrogen oxides

CO = Carbon monoxide

VOC = Volatile organic compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM10 = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO2 = Sulfur dioxide

TPY = Tons per year

mmBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Boilers No. 1 and No. 2: B001, B002

EU ID	Operations, Property and/or Equipment Description
B001	238 MMBtu/hr pulverized coal-fired boiler (including 20 MMBtu natural gas burners for startup and supplemental fuel), equipped with baghouse and steam turbine
B002	238 MMBtu/hr pulverized coal-fired boiler (including 20 MMBtu natural gas burners for startup and supplemental fuel), equipped with baghouse and steam turbine

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) *Best Available Technology (BAT)*	<u>When burning coal:</u> PE/PM_{10} shall not exceed 0.031 pound per mmBtu; PE shall not exceed 0.01 grains/acf; NOx emissions shall not exceed 0.7 pound per mmBtu; VOC emissions shall not exceed 0.62 pound per hour; CO emissions shall not exceed 5.2 pounds per hour; SO_2 emissions shall not exceed 1.6 pounds per mmBtu; Hydrogen chloride (HCl) emissions shall not exceed 21.4 pounds per hour; and Hydrogen fluoride (HF) emissions shall not exceed 1.6 pounds per hour. <u>When burning natural gas:</u> PE/PM_{10} shall not exceed 0.020 pound per mmBtu; PE shall not exceed 0.01 grains/acf; NOx emissions shall not exceed 0.7 pound per mmBtu; VOC emissions shall not exceed 0.22 pounds per hour;

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CO emissions shall not exceed 1.65 pounds per hour; and SO_2 emissions shall not exceed 1.6 pounds per mmBtu. <u>When burning any combination of fuels, emissions units B001 and B002, combined, shall not exceed the following emission limitations:</u> VOC emissions shall not exceed 0.07 TPY*; and CO emissions shall not exceed 0.65 TPY*. PE/PM_{10} shall not exceed 0.62 TPY*; HCl emissions shall not exceed 1.67 TPY*; and HF emissions shall not exceed 0.11 TPY*. *based on rolling, 12-month summations. See b)(2)a., b)(2)b., and c)(1). The requirements of this rule also include compliance with the requirements of OAC rule 3745-18-15(O)(1), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC 3745-17-10(C)(1) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) *Synthetic minor to avoid Prevention of Significant Deterioration (PSD) and 40 CFR 63, Subpart DDDDD*	<u>When burning any combination of fuels, emissions units B001 and B002, combined, shall not exceed the following emission limitations:</u> SO_2 emissions shall not exceed 33.03 TPY*; and NOx emissions shall not exceed 14.45 TPY*. *based on rolling, 12-month summations. See Section B.3. and c(5).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 pound per mmBtu of actual heat input when burning natural gas.
e.	OAC rule 3745-17-10(C)(1)	The emission limitation established by this rule is less stringent than that established by OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-18-15(O)(1)	SO_2 emissions shall not exceed 1.6 pounds per mmBtu of actual heat input.

(2) Additional Terms and Conditions

a. NOx emissions shall not exceed 0.7 pound per mmBtu of actual heat input. This limit is based on a review by U.S. EPA of the performance test for emissions units B001 and B002, which indicated that the NOx emissions limit of 0.6 pound per mmBtu in the Prevention of Significant Deterioration (PSD) permit 5-79-A-28 cannot be attained and maintained.

b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, fuel restrictions, operating rate restrictions and the use of a fabric filter.

c. The hourly emission limitations for CO, VOC, HCl, and HF are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

c) Operational Restrictions

(1) The emissions units shall utilize the manufacturer's best design for minimizing NOx emissions. The design shall utilize overfire, side fire air, or equivalent design technology, including but not limited to low NOx burners, 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 each emissions unit shall not exceed 238 mmBtu/hour and 180,000 pounds of steam per hour.

(3) The quality of coal burned in each emissions unit shall meet the following specification on an as-burnedbasis:

a. A combination of ash content and heat content sufficient to comply with the particulate emission limitations specified in b)(1)a.; and

b. A combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds per 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 pressure drop across the baghouse for each emissions unit shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.

(5) The combined maximum heat input rate for emissions units B001 and B002 shall not exceed 41,285 MMBtu per year, based upon a rolling, 12-month summation of the actual heat input rate.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect representative grab samples of the coal burned in the emissions units 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, Standard Practice for 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 to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, and heat content.

(2) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse of each emissions unit 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.

(3) The permittee shall maintain daily records of the following information:

a. the heat input for each emissions unit, in mmBtu/hr;

b. the hours of operation for each emissions unit; and

c. the daily average operating rate, in mmBtu/hr, for each 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 each 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.

(4) When combusting coal, the permittee shall perform daily checks, when each emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving the 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 abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(5) The permittee shall maintain monthly records of the following information:

a. the usage rates for each fuel (natural gas and coal) burned in each emissions unit;

b. the actual heat input rate for each emissions unit; and

c. the rolling, 12-month summation of the actual heat input rate for emissions units B001 and B002, combined.

(6) 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_2, NOx, PE/PM_{10}, VOC, CO, HCl, and HF when burning any combination of fuels; and

b. the rolling, 12-monthly summation emissions total, in tons, for SO_2, NOx, PE/PM_{10}, VOC, CO, 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).

e) Reporting Requirements

(1) The permittee shall submit quarterly reports on the quality and quantity of the coal burned in each emissions unit. These reports shall include the following information for the emissions unit for each month during the calendar quarter:

a. the total quantity of coal burned (tons);

b. the average ash content (percent) of the coal burned;

c. the average sulfur content (percent) of the coal burned;

d. the average heat content (Btu/pound) of the coal burned; and

e. the calculated, average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) for the coal burned.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by February 15, May 15, August 15 and November 15 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the data obtained during the previous calendar quarters.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in c)(4);

b. all exceedances of the rolling, 12-month SO_2 and NOx emissions limitations;

c. all periods of time during which the steam load exceeded 180,000 lbs of steam per hour;

d. all periods of time during which the daily average operating rate exceeded 238 mmBtu/hour; and

e. all exceedances of the rolling, 12-month heat input rate limitation for emissions units B001 and B002 combined;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) 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.

(4) The permittee shall submit annual reports which specify the total PE/PM_{10}, SO_2, NOx, 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.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable 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:

PE shall not exceed 0.031 pound per 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 PE limitations based upon the results of emission testing required in f)(2) of this permit.

c. Emission Limitation:

PE shall not exceed 0.020 pound per mmBtu of actual heat input.

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 particulate/mm cu. ft, 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:

NOx emissions shall not exceed 0.7 pound per 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 f)(2) of this permit.

e. Emission Limitation:

SO_2 emissions shall not exceed 1.6 pounds per mmBtu of actual heat input.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO_2 emission limitation based on the monitoring and record keeping requirements in d)(1), and

the reporting requirements in e)(1) of this permit. The SO_2 emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO_2 emission rate is the sum of SO2 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.

f. Emission Limitations:

0.62 lb VOC/hr, when burning coal; and
0.22 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.

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.

g. Emission Limitations:

5.2 lbs CO/hr, when burning coal; and
1.65 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.

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.

h. Emission Limitation:

21.4 lbsHCl/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.

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.

i. 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.

j. Emission Limitations:

The total emissions from emissions units B001 and B002 combined shall not exceed the following emission limitations:

33.03 tons of SO_2 emissions per rolling, 12-month period;
14.45 tons of NOx emissions per rolling, 12-month period;
0.62 tons of PE/PM_{10} emissions per rolling, 12-month period;
0.07 tons of VOC emissions per rolling, 12-month period;
0.65 tons of CO emissions per rolling, 12-month period;

1.67 tons of HCl emissions per rolling, 12-month period; and
0.11 tons of HF emissions per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the SO_2, NOx, PE/PM_{10}, HCl, and HF emission limitations specified above shall be determined by the record keeping requirements specified in d)(6).

(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 mass emission limit for particulate of 0.031 lb/mmBtu, 0.01 grains/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 under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(3) Compliance with the combined heat input rate limitation shall be demonstrated by the recordkeeping required in d)(5).

g) Miscellaneous Requirements

(1) None.