



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

2/5/2016

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: ANHEUSER-BUSCH COLUMBUS BREWERY
Facility ID: 0125040554
Permit Type: Renewal
Permit Number: P0116911

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins". The signature is written in a cursive style.

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA DAPC, Central District Office



PROPOSED

Division of Air Pollution Control Title V Permit for ANHEUSER-BUSCH COLUMBUS BREWERY

Facility ID:	0125040554
Permit Number:	P0116911
Permit Type:	Renewal
Issued:	2/5/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
ANHEUSER-BUSCH COLUMBUS BREWERY

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Proposed Title V Permit
ANHEUSER-BUSCH COLUMBUS BREWERY
Permit Number: P0116911
Facility ID: 0125040554
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040554
Facility Description: Malt Beverages
Application Number(s): A0050234, M0002908
Permit Number: P0116911
Permit Description: Title V renewal permit for a brewery: includes boilers, fill lines, grain building and malt aspirators.
Permit Type: Renewal
Issue Date: 2/5/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0082727

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

ANHEUSER-BUSCH COLUMBUS BREWERY
700 SCHROCK ROAD
COLUMBUS, OH 43229-1159

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Proposed Title V Permit
ANHEUSER-BUSCH COLUMBUS BREWERY
Permit Number: P0116911
Facility ID: 0125040554
Effective Date: To be entered upon final issuance

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - (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 Ohio EPA DAPC, Central District Office 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
- d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
- e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



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ANHEUSER-BUSCH COLUMBUS BREWERY

Permit Number: P0116911

Facility ID: 0125040554

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Central District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



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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. Risk Management Plans:
 - a) 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.
 - b) 40 CFR Parts 82.154, 82.156, 82.166 (i),(j),(k), (m)

The facility shall comply with the requirements of the above rules. The facility shall keep service records of all units containing CFC compounds on file for the most recent three year period.

3. The following insignificant emissions units located at this facility are exempt from permitting requirements because it is not subject to any applicable requirements as defined in OAC rule 3745-77-01(H); it meets the "de minimis" criteria established in OAC rule 3745-15-05; or it meets the requirements in the "permit-by-rule" criteria established in OAC rule 3745-31-03(A)(4):

<u>SOURCE ID</u>	<u>SOURCE DESCRIPTION</u>
P006	Vacuum Cleaning-1
P007	Vacuum Cleaning-2
P008	Grain Unloading-1
P009	Grain Unloading-2
P025	Diatomaceous Earth Storage Tank-1
P026	Diatomaceous Earth Storage Tank-2
P030	Brew Kettle-1
P044	O/S Chip Washers
P045	N/S Chip Washers
P051	ACP Mix Tank
P059	Cardboard Baler-N
P060	Cardboard Baler-S
P062	85 Pasteurizer
P064	95 Keg Washer
T001	Fuel Oil Storage Tank-1



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T002	Fuel Oil Storage Tank-2
T014	Alcohol Surge Tank
T017	Evaporator Feed Tank-1
P114	25 Pasteurizer
P115	80 Pasteurizer
P116	Parts Cleaner-1
P117	Parts Cleaner-2
P118	Parts Cleaner-3
P119	Parts Cleaner-4
P122	Chips Dumpster
P123	Label Adhesives
P124	Hot Glue Melt
P125	Bottle and Can Crusher
P126	General Painting
P127	CO2 Regeneration
P128	Video Jet Inking
T028	Finishing Tanks
T029	Alpha Fermentation Tanks
T030	Chips Fermentations Tanks
P129	95 Keg Filler
P130	Alpha Drop Receiver
P131	Cold Wort Settler
T031	Krausen Hold Tank
P132	Schoene Receivers
T032	Schoene Tanks
T033	Spent D.E. Slurry Tank



T034	Spent Yeast Tanks
T035	Wet Spent Grain Loadout Tank
P134	Yeast Brinks
P135	Packaging Line Lubricants
P136	Diesel Fire Pump

3. The Ohio EPA has determined that the emissions units B001, B002, B003, and B004 are subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Boilers. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

[Authority for term: 40 CFR Part 63, Subpart JJJJJJ]

4. The requirements of 40 CFR Part 60, Subpart Db do not apply to the emissions units B001, B002, B003 and B004 because the sources commenced construction prior to June 19, 1984.

[Established by 40 CFR Part 60, Subpart Db under 60.40b(a)]



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C. Emissions Unit Terms and Conditions



1. P052, EVAP. & COND.

Operations, Property and/or Equipment Description:

EVAPORATOR WITH CONDENSER (O'DOUL'S) (23-350)

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) [Established by PTI 01-4042, issued final 11/18/92]	Volatile organic compound (VOC) emissions shall not exceed 9.0 pounds per hour (lbs/hr) and 39.4 tons per year (tpy). See c)(1)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate a condenser with a collection efficiency of 99% when the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall keep a record of when the condenser is not in service when the emission unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)]



e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the condenser was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

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

VOC emissions shall not exceed 9.0 lbs/hr and 39.4 tons/yr

Applicable Compliance Method

Compliance with the hourly emissions limitation may be determined by multiplying the hourly production rate in lbs/hr by the emission factor (0.045, PTI application, July 1992) then multiplying by the control efficiency of the condenser (99.3%, PTI application, July 1992). Annual emissions may be determined by multiplying the hourly emissions in lb/hr by 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, compliance with the annual limit shall be assumed provided compliance is maintained with the hourly limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



2. P075, BERS

Operations, Property and/or Equipment Description:

Bioenergy recovery system to produce biogas from plant wastewater treatment with clarifier, equalization tanks, three anaerobic reactors, wet scrubber, and two 31.9 mmbtu/hr flares

- 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 operations(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. 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) [Established by PTI 01-01282, issued final 8/22/06]	Combustion of biogas from the two flares shall not exceed the following emission limitations: 44.6 lbs of sulfur dioxide (SO ₂)/hr; 23.64 lbs of carbon monoxide (CO)/hr; 4.35 lbs of nitrogen oxides (NO _x)/hr; and 8.95 lbs of volatile organic compounds (VOC)/hr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) [Synthetic minor to avoid PSD, established by PTI 01-01282]	Combustion of biogas from the two flares shall not exceed the following emission limitations: 39.47 tons of SO ₂ per rolling, 12-month period; 20.94 tons of CO per rolling, 12-month period; 3.85 tons of NO _x per rolling, 12-month period; and 7.92 tons of VOC per rolling, 12-month period. See Section c)(1) – (6)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. The hourly SO₂, CO, NO_x, and VOC emission limitations for this emissions unit were established to reflect the potentials to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The maximum allowable monthly quantity of biogas combusted in the flares shall not exceed 150,900,000 cubic feet per rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

(2) The permittee shall combust all excess biogas not used as fuel by the boilers, B001-B004, in the flares.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

(3) The permittee shall follow the manufacturer's recommended guidelines for the proper operation, maintenance, and periodic inspection of the flares.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

(4) The permittee shall utilize condensate traps to remove water from the biogas stream prior to flaring.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

(5) The permittee shall employ and operate a wet scrubber to control the odors from biogas production when the emissions unit is in operation except for periods of time when the unit is being cleaned, maintained, repaired, and/or tested (approximately 12 hours per month). All vent gases from the equalization tanks and anaerobic reactors shall be directed to the wet scrubber. When the wet scrubber needs to be shutdown for cleaning, maintenance, repairs, and/or testing the permittee shall not operate the fans associated with the scrubber.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

- (6) The amount of total sulfur in the biogas shall be minimized by adding iron chloride to the equalization tanks, as needed, to precipitate additional sulfur and reduce the amount of total sulfur in the biogas.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for the bio-energy recovery system of a monthly basis:

- a. The quantity of biogas combusted in the flares, in cubic feet;
- b. The rolling, 12-month summation of biogas combusted in the flares, in cubic feet; and
- c. The rolling, 12-month summation of SO₂, CO, NO_x, and VOC emissions from biogas combusted in the flares in tons/year.

[Authority for term: OAC rule 3745-77-07(C), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare(s) and scrubber stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in the 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 emission incident; and
- e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under term (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-17-07(A)(1)(a)]

- (3) The permittee shall keep a record of any time period when the wet scrubber is not in service and the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)]

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

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

- a. Any monthly record showing exceedance of the rolling, 12-month limitation of the amount of biogas combusted in the flares; and
- b. Any monthly record showing an exceedance of the rolling, 12-month emission limitations.
- c. Any daily record showing that the wet scrubber was not in service when the emissions unit was in operation.

These quarterly reports shall be submitted to the Ohio EPA, Central District Office in accordance with Section A.2 of the General Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(A)(3)(c), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-17-07(A)(1)(a)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:



a. Emission Limitation:

44.6 lbs of SO₂/hr from the combustion of biogas in the flares.

Applicable Compliance Method:

The hourly emission limitation was established by the following equation based on information in the permit to install application submitted April 27, 2004.

(hourly flow rate of both flares combined) x (maximum concentration of H₂S in biogas, in ppm) x (molecular weight of H₂S, lb per lb-mol) x lb-mol per 379.4 cubic feet) = lbs H₂S generated/hour

(lbs of H₂S generated/hour) x (molecular weight of SO₂/molecular weight of H₂S) = lbs of SO₂ generated/hour

where,

(85,200ft³/hour for both flares) x (3,100 ppm of H₂S/1,000,000) x (34lbs H₂S/lb-mol) x (lb-mol/379.4 ft³) = 23.7 lbs H₂S/hr**

23.7 lbs H₂S/hr) x (lb-mol/34 lbs H₂S) x (64 lbs SO₂/lb-mol) = 44.6 lbs SO₂/hr

**Assumes 100% of H₂S converted to SO₂

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

b. Emission Limitation:

39.47 tons of SO₂ per rolling 12-month period

Applicable Compliance Method:

Compliance with the annual emission limitation may be determined through the record keeping required by Section d)(1) above. The limitation is based on the maximum allowable combustion of biogas in the flares (150,900,000 ft³/yr) and the equation in f)(1)a. above.

[Authority for term: OAC rule 3745-77-07(C)(1) , OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

c. Emission Limitations:

23.64 lbs CO/hr from the combustion of biogas in the flares



4.35 lbs of NO_x/hr from the combustion of biogas in the flares

8.95 lbs of VOC/hr from the combustion of biogas in the flares

Applicable Compliance Method:

The hourly emission limitations were established by multiplying the following emission factors for each pollutant by the maximum heat input of 63.9 mmBtu/hr (31.9 mmBtu/hr each flare).

Pollutant Emission Factors

CO 0.37 lbs CO/mmBtu

NO_x 0.068 lbs NO_x/mmBtu

VOC 0.14 lbs of VOC/mmBtu

All emission factors are found in U.S. EPA, AP-42, Compilation of Air Pollutant Emission Factors, Table 13.5-1 for Industrial Flares (9/91).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

d. Emission Limitations:

20.94 tons of CO per rolling, 12-month period

3.85 tons of NO_x per rolling, 12-month period

7.92 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual emission limitations may be determined through the record keeping required by Section d)(1) above. The limitations are based on the maximum allowable combustion of biogas in the flares (150,900,000 ft³/yr) multiplied by biogas heat content (750 Btu/ft³) and specific pollutant emission factor (listed in f)(1)c. above). The result is divided by 2000 lb/ton to obtain the annual limitation.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D)]

e. Emission Limitation:

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



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Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, as outlined in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)(a)]

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -Boilers: B001, B002, B003, B004

EU ID	Operations, Property and/or Equipment Description
B001	#1 BOILER (28-110-1)
B002	#2 BOILER (28-110-2)
B003	#3 BOILER (28-110-3)
B004	#4 BOILER (28-110-4)

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 3745-17-10(C)(1)	Particulate emissions (PE) from emissions units B001, B002, B003, and B004 shall not exceed 0.127 lb per million Btu (MMBtu) of actual heat input when burning no.6 residual oil and DDO.
b.	OAC rule 3745-17-10(B)(1)	PE emissions from this emissions unit shall not exceed 0.020 lb/MMBtu of actual heat input when burning natural gas.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-31(T)	See b)(2)a. and c)(2) below
e.	OAC rule 3745-110-03	Nitrogen oxide (NOx) emissions shall not exceed 0.12 lb/NOx of actual heat input when burning fuel oil.
f.	40 CFR Part 63, Subpart JJJJJ (40 CFR 63.11193-11237) National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources [In accordance with 40 CFR	Applicable Emission Limits in Table 1; Work Practice Standards Emission Reduction Measures, and Management Practices in Table 2; and Operating Limits in Table 3 to Subpart JJJJJ of 40 CFR Part 63.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	63.11200 and 63.11237, this emissions unit is an existing natural gas and oil-fired boiler subject to the oil subcategory requirements as defined in this subpart.]	
g.	40 CFR Part 63, Subpart A	Table 8 to 40 CFR Part 63, Subpart JJJJJ – Applicability of General Provisions (Subpart A) to Subpart JJJJJ, which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

- a. Anheuser-Busch Columbus Brewery shall not cause or permit the emission of sulfur dioxide (SO₂) from boiler numbers 1 through 4 to exceed 2.4 pounds of sulfur dioxide per MMBtu actual heat input from each boiler and shall operate said boilers such that their combined average operating rate shall not exceed three hundred two (302) MMBtu per hour for any calendar day.
- b. The permittee shall comply with the applicable emission limits required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11194	affected source(s) subject to subpart
63.11195	exemptions
63.11196	compliance dates
63.11201	emission limits and standards

[Authority for term: 40 CFR Part 63, Subpart JJJJJJ]

c) Operational Restrictions

- (1) The permittee shall not burn No. 6 residual oil (fuel oil) or DDO in emissions units B001, B002, B003, and B004 unless stack testing has been conducted to demonstrate compliance with the particulate emission limitation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The quality of the No.6 residual oil (fuel oil) burned in this emissions unit shall meet, on an as-received basis, a sulfur content (percent) which is sufficient to comply with the allowable SO₂ emission limitation of 2.4 lbs/MMBtu of actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]



- (3) The permittee shall comply with the applicable emission limits, work practice standards, emission reduction measures, and management practices required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11200	subcategories of boilers
63.11201, 63.11223, and Table 2 to Subpart JJJJJJ	work practice standards, emission reduction measures, and management practice
Table 3 to Subpart JJJJJJ	operating limits for boilers with emission limits
63.11210, 63.11211 and Table 6 to Subpart JJJJJJ	initial compliance establishing operating limits
63.11220, 63.11221, 63.11222, 63.11223 and Table 7 to Subpart JJJJJJ	demonstrating continuous compliance
63.11226	affirmative defense for violation of emission standards during malfunction

[Authority for term: 40 CFR Part 63, Subpart JJJJJJ]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect or require the fuel oil supplier to collect a representative grab sample for each shipment of No. 6 fuel oil that is received for burning in emissions units B001 through B004. The permittee shall perform or require the supplier to perform the analyses for sulfur content (percent) and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, ASTM method D2622 or ASTM method 6010 for sulfur content; and ASTM method D240 and ASTM method D4809 for heat content. The permittee shall maintain the original fuel oil shipment tickets and analysis reports for five years and is subject to agency review. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA, Central District Office.

[Authority for term: OAC rule 3745-77-07(C)]

- (2) For each shipment of No. 6 fuel oil received for burning in emissions units B001 through B004, the permittee shall maintain records of the following:
- a. the total quantity of fuel oil received in each shipment (gallons);
 - b. the permittee's or fuel oil supplier's analyses of the heat content (Btu/gallon) of the fuel oil received in each shipment;
 - c. the permittee's or fuel oil supplier's analyses of the sulfur content (percent) of the fuel oil received in each shipment;



- d. the calculated sulfur dioxide emission rate (lbs of SO₂/MMBtu of actual heat input) of the fuel oil received in each shipment (see section f)(1)d.);
- e. the calculated particulate matter emission rate (lbs of PE/MMBtu of actual heat input) of the fuel oil received in each shipment(see section f)(1)c.); and
- f. monthly calculations of the weighted average sulfur content, and heat content of the fuel oil received during each calendar month, and the total quantity (gallons) of fuel oil burned in emissions units B001 through B004 during the month.

[Authority for term: OAC rule 3745-77-07(C)]

- (3) The permittee shall maintain records of the daily combined average operating rate in MMBTU/hr for Boilers 1-4.

[Authority for term: OAC rule 3745-77-07(C)]

- (4) The permittee shall perform weekly checks, when this emissions unit is in operation and burning No. 6 fuel oil, and when the weather conditions allow, for any visible particulate emissions 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 operation;
 - 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 eliminate 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.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-17-07(A)]

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:



63.11224	monitoring, installation, operation and maintenance requirements
63.11225	recordkeeping requirements

[Authority for term: 40 CFR Part 63, Subpart JJJJJJ]

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the PE and SO₂ emission limitations (lb/MMBtu of actual heat input) for emissions units B001 through B004 of this permit, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted to the Ohio EPA, CDO by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (i.e., October through December, January through March, April through June, and July through September, respectively).

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the combined average operating rate limitation for Boilers 1-4, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted to the Ohio EPA, CDO by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (i.e., October through December, January through March, April through June, and July through September, respectively).

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit quarterly 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 quarterly reports shall be submitted to the Ohio EPA, CDO by January 31, April 30, July 31, and October 31 of each year and shall cover the cover the previous calendar quarters (i.e., October through December, January through March, April through June, and July through September, respectively).

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]



- (4) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11225	notification and reporting requirements
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[Authority for term: 40 CFR Part 63, Subpart JJJJJJ]

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% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, as outlined in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input when burning natural gas.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (113,300 cu. ft/hr) by the AP-42, Table 1.4-2, 5th Edition, emission factor for natural gas combustion (3.0 lbs of PE/MM cubic ft), and dividing by the maximum hourly heat input capacity of the emissions unit (113.3 MMBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)(1)]

c. Emission Limitation:

0.12 lb NOx/MMBtu when burning distillate oil



Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42, Table 1.3-1, 5th Edition, emission factor of 40 lbs NO_x/10³ gal for No. 6 fuel oil by the fuel oil usage determined in d)(2)a., and multiplied by the conversion of 0.15 MMBtu/gal.

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Method 7.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03]

d. Emission Limitation:

0.127 lb of PE per MMBtu of actual heat input when burning No. 6 fuel oil and DDO.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing prior to burning No. 6 oil, in accordance with the following requirements:

- i. The emission testing shall be conducted to determine compliance with the allowable emission rate for particulates from B001, B002, B003, and B004 depending on which boiler is tested.
- ii. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate for particulates: Methods 1 through 5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iii. The tests shall be conducted while emissions units B001, B002, B003 and B004 (whichever is in operation during testing) are operating at or near maximum capacity while burning No. 6 fuel oil, unless otherwise specified or approved by the Ohio EPA, CDO.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. 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, CDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, CDO 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 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 Ohio EPA, CDO 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 Ohio EPA, CDO.

[Authority for term: OAC rule 3745-77-07(C)(1)]

Applicable Compliance Method:

Compliance with the PE emission limitation may be calculated by using the following equation from AP42, Table 1.3-1, 5th Edition:

$$\text{PE Emission Rate (lbs/mmBtu)} = [(9.19 * (S) + 3.22) \text{ lbs PE} / 1000 \text{ gal}] / H$$

Where, S is the actual weight % sulfur in the fuel, and H is the actual fuel oil heat content (mmBtu/1000 gal). S and H are determined from permittee's or fuel oil supplier's analyses (See Section d)(1)).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(C)(1)]

e. Emission Limitation:

2.4 lbs of SO₂ per MMBtu of actual heat input when burning No. 6 fuel oil.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing prior to burning No. 6 fuel oil accordance with the following requirements:

- i. The emission testing shall be conducted to determine compliance with the allowable emission rate for sulfur dioxide from B001, B002, B003, and B004, depending on which boiler is tested.
- ii. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate for sulfur dioxide: Methods 1 through 6C of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iii. The tests shall be conducted while emissions units B001, B002, B003 and B004 (whichever is in operation during testing) are operating at or near maximum capacity while burning fuel oil, unless otherwise specified or approved by the Ohio EPA, CDO.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. 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, CDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, CDO 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 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 Ohio EPA, CDO 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 Ohio EPA, CDO.

Applicable Compliance Method: Compliance with the SO₂ emission limitation may be calculated by using the following equation from AP-42, Table 1.3-1, 5th Edition:

$$\text{SO}_2 \text{ Emission Rate (lbs/MMBtu)} = [(157 * (S) \text{ lbs SO}_2/1000 \text{ gal})]/H$$

where, S is the actual weight % sulfur in the fuel, and H is the actual fuel oil heat content (MMBtu/1000 gal). S and H are determined from permittee's or fuel oil supplier's analyses (see Section d)(1)).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-31(T)]

- (2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11212	stack tests and procedures for performance tests
63.11213	fuel analyses and procedures for performance tests

[Authority for term: 40 CFR Part 63, Subpart JJJJJJ]

g) **Miscellaneous Requirements**

- (1) None.



4. Emissions Unit Group -Fill Lines: P068, P069, P072, P073, P108, P109, P110

EU ID	Operations, Property and/or Equipment Description
P068	LINE 25 BOTTLE FILLER (24-25-070)
P069	LINE 45 CAN FILLER (25-45-060)
P072	LINE 80 BOTTLE FILLER (NEW UNIT 4/98)
P073	LINE 85 BOTTLE FILLER (NEW UNIT 4/97)
P108	LINE 75 BOTTLE FILLER
P109	LINE 55 CAN FILLER
P110	LINE 65 CAN FILLER

- 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) [Established by PTI 01-6675, issued final 09/02/98 for P068 and P069] [Established by PTI 01-7328, issued final 09/02/98 for P072 and P073] [Established by PTI 01-7498, issued final 11/23/98 for P108] [Established by PTI 01-7877, issued final 09/09/99 for P109 and P110]	<u>For P068:</u> Organic compound (OC) emissions shall not exceed 3.13 pounds per hour (lbs/hr) and 13.70 tons per year (tpy). <u>For P069:</u> OC emissions shall not exceed 4.75 lbs/hr and 20.79 tpy. <u>For P072:</u> OC emissions shall not exceed 3.78 lbs/hr and 16.53 tpy. <u>For P073:</u> OC emissions shall not exceed 3.62 lbs/hr and 15.86 tpy. <u>For P108:</u>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OC emissions shall not exceed 3.74 lbs/hr and 16.38 tpy. <u>For P109 and P110:</u> OC emissions shall not exceed 5.04 lbs/hr and 22.08 tpy. <u>For P068, P069, P072, P073, P108, P109, and P110:</u> See b)(2)a.

(2) Additional Terms and Conditions

- a. The limitation represents the restricted maximum hourly OC emission rate. No additional recordkeeping is required to comply with the hourly emission limitation.

c) Operational Restrictions

- (1) For P068, the maximum fill rate of packaged beer from this emission unit shall not exceed 1,611,840 barrels per year.
[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
- (2) For P069, the maximum fill rate of packaged beer from this emissions unit shall not exceed 2,969,640 barrels per year.
[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]
- (3) For P072, the maximum fill rate of packaged beer from this emissions unit shall not exceed 1,944,720 barrels per year.
[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
- (4) For P073, the maximum fill rate of packaged beer from this emissions unit shall not exceed 1,865,880 barrels per year.
[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
- (5) For P108, the maximum annual production of package beer from this emissions unit shall not exceed 1,927,200 barrels per year.
[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]
- (6) For P109, the maximum annual production of package beer from this emissions unit shall not exceed 3,153,600 barrels per year.



[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

- (7) For P110, the maximum annual production of package beer from this emissions unit shall not exceed 3,153,600 barrels per year.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following monthly information for each emissions unit:
 - a. the packaged beer fill rate, in barrels.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-31-05(A)(3)]

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit annual reports which specify the total packaged beer fill rate, in barrels, and the total OC emissions from this emissions unit for the previous calendar year (i.e., January through December). These reports shall be submitted by February 15 of each year.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-31-05(A)(3)]

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation for P068:

3.13 lbs OC/hr and 13.7 tpy

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8,760 hours and then multiplying the resultant by an emission factor of 17 lbs OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Hourly OC Emission (lbs/hr) = 17 lbs per 1000 barrels of beer packaged x hourly fill rate.



Compliance with the annual emission limitation shall be determined by multiplying the actual annual fill rate (summation of values in Section d)(1)a.) by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Annual OC Emissions (Tons/Yr) = 17 lbs per 1000 barrels of beer packaged x annual fill rate x 1 ton/2000 lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation for P069:

4.75 lbs OC/hr and 20.79 tpy

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by dividing the maximum restricted annual fill rate by 8,760 hours and then multiplying the resultant by an emission factor of 14 lbs OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Hourly OC Emissions (lbs/hr) = 14 lbs per 1000 barrels of beer packaged x hourly fill rate.

Compliance with the annual emission limitation shall be determined by multiplying the actual annual fill rate (summation of values in Section d)(1)a.) by an emission factor of 14 pounds OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Annual OC Emissions (Tons/Yr) = 14 lbs per 1000 barrels of beer packaged x annual fill rate x 1 ton/2000 lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

c. Emission Limitation for P072:

3.78 lbs OC/hr and 16.53 tpy

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by dividing the maximum restricted annual fill rate by 8,760 hours and then multiplying the resultant by an emission factor of 17 lbs OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Hourly OC Emissions (lbs/hr) = 17 lbs per 1000 barrels of beer packaged x hourly fill rate.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]



Compliance with the annual emission limitation shall be determined by multiplying the actual annual fill rate (summation of values in Section d)(1)a.) by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Annual OC Emissions (Tons/Yr) = 17 lbs per 1000 barrels of beer packaged x annual fill rate x 1 ton/2000 lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

d. Emission Limitation for P073:

3.62 lbs OC/hr and 15.86 tpy

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by dividing the maximum restricted annual fill rate by 8,760 hours and then multiplying the resultant by an emission factor of 17 lbs OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Hourly OC Emissions (lbs/hr) = 17 lbs per 1000 barrels of beer packaged x hourly fill rate.

Compliance with the annual emission limitation shall be determined by multiplying the actual annual fill rate (summation of values in Section d)(1)a.) by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Annual OC Emissions (Tons/Yr) = 17 lbs per 1000 barrels of beer packaged x annual fill rate x 1 ton/2000 lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

e. Emission Limitation for P108:

3.74 lbs OC/hr and 16.38 tpy

Applicable Compliance Method:

Compliance with the short term emission limitation shall be determined by multiplying the monthly average hourly production rate by the AP-42 bottle filler line emission factor of 17.0 pounds per 1000 barrels of beer packaged found in Table 9.12.1-2, 5th edition.

Compliance with the annual emission limitation shall be determined by multiplying the actual annual fill rate (summation of values in Section d)(1)a.) by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).



Annual OC Emissions (Tons/Yr) = 17 lbs per 1000 barrels of beer packaged x annual fill rate x 1 ton/2000 lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

f. Emission Limitation for P109 and P110:

5.04 lbs OC/hr and 22.08 tpy.

Applicable Compliance Method:

Compliance with the short term emission limitation shall be determined by multiplying the monthly average hourly production rate by the AP-42 can filler line emission factor of 14.0 pounds per 1000 barrels of beer packaged found in Table 9.12.1-2, 5th edition.

Compliance with the annual emission limitation shall be determined by multiplying the actual annual fill rate (summation of values in Section d)(1)a.) by an emission factor of 14 pounds OC per 1,000 barrels of beer packaged (AP-42, Table 9.12.1-2, 5th Edition).

Annual OC Emissions (Tons/Yr) = 14 lbs per 1000 barrels of beer packaged x annual fill rate x 1 ton/2000 lbs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group -Grain Building: P001, P002, P102, P103, P106

EU ID	Operations, Property and/or Equipment Description
P001	GRAIN. BLDG. DUST COLLECTION -1 (19-121-8)
P002	GRAIN. BLDG. DUST COLLECTION -2 (19-134-4)
P102	Grain building dust collection (Brewhouse No. 1)
P103	Dust Conveying Brewhouse 1 and Brewhouse 2
P106	Grain building dust collection (Brewhouse No. 2)

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) [Established by PTI 01-7399, issued final 08/26/04]	<u>For P102 and P106:</u> Particulate emissions (PE) shall not exceed 0.12 pound per hour (lbs/hr) and 0.51 ton per year (tpy) for each emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See b)(2)a. – b.
b.	OAC rule 3745-17-11(A)(2)	See b)(2)c.
c.	OAC rule 3745-17-11(B)(1)	<u>For P001, P002, and P103:</u> PE shall not exceed 32.9 lbs/hr for each emission unit. <u>For P102 and P106:</u> See b)(2)d.
d.	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% as a six-minute average, except as provided by rule. See c)(1)

- (2) Additional Terms and Conditions
 - a. The total hourly PE from emissions units P102 and P106 shall not exceed 0.30 pound per hour.
 - b. The total annual PE from emissions units P102 and P106 shall not exceed 1.22 tons per year.
 - c. The emissions limitation specified by OAC rule 3745-17-11(A)(2) is less stringent than the emission limitation established under OAC rule 3745-31-05(A)(3).
 - d. The emissions limitation specified by OAC rule 3745-17-11(B)(1) is less stringent than the emission limitation established under OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
 - (1) The permittee shall operate a fabric filter when emissions units P001, P002, and P103 are in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-07(A)(1)]
 - (2) For P102 and P106, malt and adjunct grains shall not occur without the use of fabric filters to control particulate matter emissions from any grains transfer operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]
 - (3) For P102 and P106, the maximum allowable throughput of malt (grains) shall not exceed 30,000 pounds per hour per brewhouse.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]
 - (4) For P102 and P106, the maximum allowable throughput of adjunct (grains) shall not exceed 15,000 pounds per hour per brewhouse.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall keep a record of when emissions from emissions units P001, P002, and P103 were not vented through the fabric filter when the emission unit is in operation.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-17-11(B)(1)]
 - (2) For P102 and P106, the permittee shall maintain daily records of the average hourly malt (grains) and adjunct (grains) throughput per day.

[Authority for term: OAC rule 3745-77-07((C) and OAC rule 3745-31-05(A)(3)]
 - (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit during operation. 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. the emissions are not representative of normal operation, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing visible emission checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-17-07(A)(1)]

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-17-11(B)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-17-07(A)(1)]

- (4) For P102 and P106, the permittee shall submit quarterly reports that identify any exceedances during which the average hourly malt (grains) and adjunct (grains) throughput for each day exceeded the maximum allowable hourly malt throughput limitation for each brewhouse, as well as the corrective actions that were taken to achieve compliance.



[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-31-05(A)(3)]

- (5) For P102 and P106, the permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-17-07(A)(1)]

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 P102 and P106:

PE shall not exceed 0.12 lb/hr and 0.51 tpy for each emission unit

Applicable Compliance Method:

For Grain Building Dust Collection (P102/P106), use an emission factor of 4.2 pounds per ton of malt grain transferred, and an emissions factor of 7.0 pounds per ton of adjunct grains transferred. Multiply these emission factors by the average hourly malt and adjunct grains throughput for each brewhouse in tons to obtain PE emissions in pounds per hour. Apply the control efficiency of the fabric filter used to control particulate matter emissions from the grains building to obtain the controlled PE emissions rate.

lbs PE/hr = 4.2 lbs/ton malt transferred x tons malt transferred in each brewhouse x (1-control efficiency)

lbs PE/hr = 7.0 lbs/ton adjunct transferred x tons adjunct transferred in each brewhouse x (1-control efficiency)

For Grain Building Dust Collection (P102/P106), compliance with the yearly emission limit shall be determined by multiplying the pounds of PE per hour by 8760 hours per year and divide by 2000 pounds per ton to obtain PE emissions in tons per year.

tons/yr = lbs PE/hr from malt x 8760 hrs/yr / 2000 lbs/ton

tons/yr = lbs PE/hr from adjunct x 8760 hrs/yr / 2000 lbs/ton

Total hourly particulate matter emissions from grains transfer is determined from the summation of PE emissions from emission units P102 and P106 shall not exceed 0.30 lbs PE/hr..



Total annual particulate matter emissions from grains transfer is determined from the summation of PE emissions from emission units P102 and P106 shall not exceed 1.22 tons/yr.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation P001, P002, and P103:

PE shall not exceed 32.9 lbs/hr for each emission unit

Applicable Compliance Method:

Compliance with the emissions limitation may be determined by multiplying the hourly production rate in tons/hr by the emission factor (0.111 lbs PE/ton grain processed from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Table 9.9.1-1 (3/03)**) then multiplying by the control efficiency of the fabric filter (99.7%).

$$22.5 \text{ tons grain processed/hr} \times 0.111 \text{ lbs PE/ton grain processed} \times (1-.997) = 0.007 \text{ lb/hr}$$

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(B)(1)]

**The emission factor is a sum of the emission factors for Headhouse and Grain Handling (0.061 lb PE/ton), and two Storage Bins (0.025 lb PE/ton x 2) and includes emissions from the feeder hopper, grain storage, and dust collection bin.

c. Emission Limitation:

PE from emission units P102 and P106 shall not exceed 0.30 pounds per hour and 1.22 tons per year.

Applicable Compliance Method:

For Grain Building Dust Collection (P102/P106), use an emission factor of 4.2 pounds per ton of malt grain transferred, and an emissions factor of 7.0 pounds per ton of adjunct grains transferred. Multiply these emission factors by the average hourly malt and adjunct grains throughput for each brewhouse in tons to obtain PE emissions in pounds per hour. Apply the control efficiency of the fabric filter used to control particulate matter emissions from the grains building to obtain the controlled PE emissions rate.

$$\text{lbs PE/hr} = 4.2 \text{ lbs/ton malt transferred} \times \text{tons malt transferred in each brewhouse} \times (1\text{-control efficiency})$$

$$\text{lbs PE/hr} = 7.0 \text{ lbs/ton adjunct transferred} \times \text{tons adjunct transferred in each brewhouse} \times (1\text{-control efficiency})$$

For Grain Building Dust Collection (P102/P106), compliance with the yearly emission limit shall be determined by multiplying the pounds of PE per hour by



8760 hours per year and divide by 2000 pounds per ton to obtain PE emissions in tons per year.

$$\text{tons/yr} = \text{lbs PE/hr from malt} \times 8760 \text{ hrs/yr} / 2000 \text{ lbs/ton}$$

$$\text{tons/yr} = \text{lbs PE/hr from adjunct} \times 8760 \text{ hrs/yr} / 2000 \text{ lbs/ton}$$

Total hourly particulate matter emissions from grains transfer is determined from the summation of PE emissions from emission units P102 and P106 shall not exceed 0.30 lbs PE/hr..

Total annual particulate matter emissions from grains transfer is determined from the summation of PE emissions from emission units P102 and P106 shall not exceed 1.22 tons/yr.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-07399)

d. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(1)]

g) Miscellaneous Requirements

- (1) None.



6. Emissions Unit Group -Malt Aspirators: P111 and P112

EU ID	Operations, Property and/or Equipment Description
P111	Malt Cleaner/Aspirator Brewhouse 1
P112	Malt Cleaner/Aspirator Brewhouse 2

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) [Established by PTI 01-08860, issued final 08/19/04]	Particulate emissions (PE) shall not exceed 0.49 pound per hour (lb/hr) and 2.15 tons per year (tpy). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). See c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The emissions limitations of 0.49 pounds of particulate emissions per hour and 2.15 tons particulate emissions per year were established to reflect the potential to emit for this emissions unit as vented to a fabric filter. Therefore, the weekly visual checks of the fabric filter as established in the following terms and conditions will ensure compliance with these limits.

c) Operational Restrictions

- (1) All particulate emissions from this emissions unit shall be vented through a fabric filter with at least 99.9% control efficiency.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall keep a record of any time period when emissions from this emissions unit were not vented through a fabric filter with at least 99.9% control efficiency.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit during operation. 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. the emissions are not representative of normal operation, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing visible emission checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-31-05(A)(3)]

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall notify the Ohio EPA, Central District Office in writing of any record showing that any emissions from this emissions unit were not vented through a fabric filter with at least 99.9% control efficiency. The notification shall include a copy of such



record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-31-05(A)(3)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-31-05(A)(3)]

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:

PE shall not exceed 0.49 pounds per hour and 2.15 tons per year.

Applicable Compliance Method:

Compliance with the short term emission limitation shall be determined by multiplying the maximum throughput (490 lbs malt/hr, PTI application, April 27, 2004) by 1 lb of PE/lb of malt by the control efficiency of the filter/receiver (99.9%, PTI application, April 27, 2004).

Compliance with the annual emissions limitation shall be determined by multiplying the hourly emissions rate (lbs/hr) by the annual operating hours (tons/yr) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the pound per hour emission limitation and the 99.9% control efficiency of the filter/receiver through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.



Proposed Title V Permit
ANHEUSER-BUSCH COLUMBUS BREWERY
Permit Number: P0116911
Facility ID: 0125040554
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

g) Miscellaneous Requirements

(1) None.