



O. S. P. A.  
S. E. D. O.  
State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

2004 AUG 17 AM 11:47

TELE: (614) 644-3020 FAX: (614) 644-2329

08/09/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P901 (Sawdust Collection) Sawdust Collection System**

Brown-Forman Distillery - Jackson Stave (06-40-00-0206)  
Cheryl-Lynne Patrick  
850 Dixie Hwy  
Louisville, KY 40210

Dear Cheryl-Lynne Patrick:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Southeast District Office.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Southeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 08/09/04

Expiration Date: 08/09/09

This document constitutes issuance to:

Facility ID: 06-40-00-0206  
Brown-Forman Distillery - Jackson Stave  
78 Salem Church Rd.  
Jackson, OH 45640

of a permit to operate for:

P901 (Sawdust Collection)  
Sawdust Collection System

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. 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.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. Records Retention Requirements**

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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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 Director, copies of records required : kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

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

**7. Permit Transfers**

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

**8. Air Pollution Nuisance**

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

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Part II: Special Terms and Conditions**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - Sawdust Collection System	OAC rule 3745-31-05(A)(3)	0.030 grain per dry standard cubic foot or no visible emissions from the stack 3.99 lbs/hr 17.5 TPY Particulate
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three-minute average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The 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**

None

**B. Operational Restrictions**

None

**C. Monitoring and/or Record Keeping Requirements**

- The permittee shall perform weekly checks for any visible particulate emissions (stack or fugitive) from this emission unit. The visible emission checks shall be conducted during a normal representative period when material is being transferred through the emission unit. The presence or absence of any visible particulate emissions (stack or fugitive) shall be recorded in an operation log. If any visible emissions are observed from the stack, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be recorded in the operations log.

**D. Reporting Requirements**

- The permittee shall submit an exceedance report which identifies any exceedances of the above conditions, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted within 45 days of when the exceedance occurred.
- For each excursion event, the following information shall be provided:
  - The date of the excursion;

**D. Reporting Requirements (continued)**

- 2.b The duration of the excursion event;
- 2.c The operating rates during the excursion;
- 2.d The cause(s) of the excursion; and,
- 2.e The corrective action(s) which have or will be taken to prevent similar excursions in the future.

**E. Testing Requirements**

- 1. If required, compliance with the emissions limitations identified above shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

0.030 grain per dry standard cubic foot of exhaust gases from the cyclone, (Equivalent to 3.99 lbs/hr or 17.5 TPY)

Applicable Compliance Method:

Compliance shall be determined in accordance with 40 CFR 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(1). No testing is specifically required to demonstrate compliance with the limits contained in this permit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

The annual emission rate shall be determined by calculation using the hourly allowable emission rate (3.99 lb/hr) multiplied by the total annual hours of operation, or by equivalent calculation method.

$\text{tons PM/year} = (0.030 \text{ gr/dscf}) \times (15,500 \text{ dscf/min}) \times (\text{lb}/7000 \text{ gr}) \times (60 \text{ min/hour}) \times (\text{ton}/2000 \text{ lbs}) \times (\text{actual hours of operation/year})$

The flow rate of 15,500 dscf/min represents the maximum flow rate of exhaust gases from the control equipment, based on company data.

No testing is specifically required to demonstrate compliance with the annual emission limitation, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- 1.b Emission Limitation:

No visible emissions from the stack

Applicable Compliance Method:

Compliance with the emission limitation for the sawdust collection system identified above shall be determined by the monitoring and record keeping in C.1.

- 1.c Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the emission limitation for the material handling areas identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03

**F. Miscellaneous Requirements**

None