



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

4/15/2010

Certified Mail

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0125040554
Permit Number: P0106254
Permit Type: Administrative Modification
County: Franklin

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
ANHEUSER-BUSCH COLUMBUS BREWERY**

Facility ID: 0125040554
Permit Number: P0106254
Permit Type: Administrative Modification
Issued: 4/15/2010
Effective: 4/15/2010



Division of Air Pollution Control
Permit-to-Install
for
ANHEUSER-BUSCH COLUMBUS BREWERY

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Authorization

Facility ID: 0125040554
Facility Description: Malt Beverages
Application Number(s): M0000749
Permit Number: P0106254
Permit Description: The facility has applied for an administrative modification to the operational restrictions of PTI 01-01282 for emissions unit P075. The facility has requested changes to the operational language for the wet scrubber to include times when the emissions unit is being cleaned, maintained, repaired, and/or tested.
Permit Type: Administrative Modification
Permit Fee: \$100.00
Issue Date: 4/15/2010
Effective Date: 4/15/2010

This document constitutes issuance to:

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106254

Permit Description: The facility has applied for an administrative modification to the operational restrictions of PTI 01-01282 for emissions unit P075. The facility has requested changes to the operational language for the wet scrubber to include times when the emissions unit is being cleaned, maintained, repaired, and/or tested.

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

Emissions Unit ID:	P075
Company Equipment ID:	BERS
Superseded Permit Number:	01-01282
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- d) 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.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

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

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



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

14. Public Disclosure

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

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

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. 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)	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)	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) below.
c.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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.
- (2) The permittee shall combust all excess biogas not used as fuel by the boilers, B001-B004, in the flares.
- (3) The permittee shall follow the manufacturer's recommended guidelines for the proper operation, maintenance, and periodic inspection of the flares.
- (4) The permittee shall utilize condensate traps to remove water from the biogas stream prior to flaring.
- (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.
- (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.

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.

- (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.

- (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.

e) Reporting Requirements

- (1) 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.

- (2) 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.

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.

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.

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).

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.

e. 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).

g) Miscellaneous Requirements

(1) None.