



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/22/2013

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 1409000353
Permit Number: P0111980
Permit Type: Administrative Modification
County: Butler

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

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

Sincerely,

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

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

Certified Mail

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

MillerCoors LLC is a beer brewery and packaging facility located in Trenton, Ohio (Butler County). Existing packaging operations (emissions unit P030) consist of bottle, can, and keg filling lines and ancillary activities such as beer dumping, videojets (application of coding inks), and cleaning activities. Emissions unit P030 is a source of volatile organic compound (VOC) emissions, primarily ethanol, and the emissions are uncontrolled from the packaging operations.

This permitting action is an administrative modification requested by the permittee to revise emission factors and allowable emission limitations for the packaging operations under Best Available Technology (BAT) based upon updated emissions test data using more accurate US EPA-approved test methods. There has been no physical or operational change to emissions unit P030 that would increase or decrease the emission rate(s). The updated emissions test data indicates that the prior non-attainment new source review permit, Permit to Install (PTI) 14-4289, issued 7/8/1998, used emission factors that significantly over-estimated potential emissions.

The prior emission factors and allowable emission limitations in PTI 14-4289 were determined to represent the lowest achievable emission rate (LAER) and were the basis for the emission offsets at the time of that permit action. The revised allowable emission limitations represent a significant reduction in the potential to emit for VOC emissions from the packaging operation (P030), therefore, neither LAER nor emissions offsets are being re-evaluated as a result of this permit action.

3. Facility Emissions and Attainment Status:

The MillerCoors LLC Trenton Brewery is located in Butler County, Ohio, which is currently marginal non-attainment for ozone (2008 8-hour NAAQS standard) and attainment for all other criteria pollutants. MillerCoors LLC is a major stationary source due to emissions of nitrogen oxides (NO_x), carbon monoxide (CO), particulates, sulfur dioxide (SO₂), VOCs, and hazardous air pollutants (HAPs) from operations that include brewing, cold services, packaging, and power/steam generation (fossil fuel-fired boilers). At the time the facility was constructed, including emissions unit P030, the region was also non-attainment for ozone under the prior NAAQS standards.

4. Source Emissions:

This administrative modification establishes the following change in allowable VOC emission limitations that represent the revised uncontrolled potential to emit of this emissions unit:

PTI 14-4289, issued 7/8/1998
42.2 pounds VOC per hour
184.9 tons VOC per year

PTI P0111980 Administrative Modification
13.74 pounds VOC per hour
60.18 tons VOC per year



PTI P0111980 subsumes the original LAER determination and emissions offsets for this emissions unit found in PTI 14-4289 that were based upon 42.2 pounds per hour and 184.9 tons per year of VOC. These limitations are less stringent than the revised allowable limitations under BAT as a result of this administrative modification. No changes to the original LAER determination or emissions offsets established in PTI 14-4289 have been made as a result of this permit action.

5. Conclusion:

PTI P0111980 is an administrative modification to revise allowable emissions of VOC based upon updated emission factors that more accurately reflect the potential to emit of the emissions unit and result in a significant reduction in potential VOC emissions. The changes to the VOC emission factors and allowable emission limitations in this administrative modification are not a result of a physical change or change in the method of operation of the emission unit, nor do the changes impact prior major new source determinations. This administrative modification to PTI 14-4289 retains the original non-attainment new source review determinations and record keeping and reporting of annual VOC emissions.

Approval of the administrative modification is recommended. Since the prior permitting action was issued in draft and the permit retains the non-attainment new source review determinations, this administrative modification is being issued in draft for public comment and US EPA review.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	60.18

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

Issue Date: 1/22/2013
Permit Number: P0111980
Permit Type: Administrative Modification
Permit Description: Administrative modification of PTI 14-4289 for the brewery packaging operation (bottle filling, can filling, keg filling, beer dump, videojets, and cleaning) to revise VOC emission factors and emission limitations based upon updated test data.
Facility ID: 1409000353
Facility Location: MillerCoors LLC
2525 WAYNE MADISON ROAD,
Trenton, OH 45067-9760
Facility Description: Breweries

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



DRAFT

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

Facility ID:	1409000353
Permit Number:	P0111980
Permit Type:	Administrative Modification
Issued:	1/22/2013
Effective:	To be entered upon final issuance



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

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Draft Permit-to-Install
MillerCoors LLC
Permit Number: P0111980
Facility ID: 1409000353

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1409000353
Facility Description: Manufacturing and packaging of malt beverages
Application Number(s): M0001909
Permit Number: P0111980
Permit Description: Administrative modification of PTI 14-4289 for the brewery packaging operation (bottle filling, can filling, keg filling, beer dump, videojets, and cleaning) to revise VOC emission factors and emission limitations based upon updated test data.
Permit Type: Administrative Modification
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/22/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Permit-to-Install
MillerCoors LLC
Permit Number: P0111980
Facility ID: 1409000353

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0111980
Permit Description: Administrative modification of PTI 14-4289 for the brewery packaging operation (bottle filling, can filling, keg filling, beer dump, videojets, and cleaning) to revise VOC emission factors and emission limitations based upon updated test data.

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

Emissions Unit ID:	P030
Company Equipment ID:	PACKAGING
Superseded Permit Number:	14-4289
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
MillerCoors LLC
Permit Number: P0111980
Facility ID: 1409000353
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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

3. General Requirements

- a) 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 Southwest Ohio Air Quality Agency.



- (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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

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 Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Southwest Ohio Air Quality Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.



Draft Permit-to-Install
MillerCoors LLC
Permit Number: P0111980
Facility ID: 1409000353
Effective Date: To be entered upon final issuance

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. Emissions Offset Requirements:

Pursuant to Permit to Install (PTI) 14-4289, issued on July 8, 1998, emission offset requirements for the volatile organic compound (VOC) emissions from emissions unit P030 located at this facility were satisfied by the shutdown of a facility in Butler County which had actual emissions of 441 tons of VOC per year, based on 1993 and 1994 emissions data. PTI 14-4289 established allowable VOC emissions of 184.9 tons per year from emissions unit P030. At a rate of 1.2 tons of emissions offset per ton emitted at this facility, the overall change in VOC emissions was determined to be a reduction of 219 tons per year.

The revised emission factors and allowable VOC emissions of 60.18 tons per year for emissions unit P030 established in this permit modification under OAC rule 3745-31-05(A)(3) [see Section C.1.b)(1)a.] indicate a more significant reduction in VOC emissions and greater air quality benefit than originally identified in PTI 14-4289 based on the revised uncontrolled potential to emit of emissions unit P030. No change to the original emissions offset requirement was made as a result of this permit modification.



Draft Permit-to-Install
MillerCoors LLC
Permit Number: P0111980
Facility ID: 1409000353
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P030, PACKAGING

Operations, Property and/or Equipment Description:

Packaging Operation, consisting of bottle filling, can filling, keg filling, beer dump, videojets, and cleaning

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) Best Available Technology	Volatile organic compound (VOC) emissions shall not exceed 13.74 pounds per hour and 60.18 tons per year (TPY). See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-21 through 27 Nonattainment New Source Review [PTI 14-4289 issued 7/8/1998 is subsumed into this permit action]	See b)(2)c. below and Section B.2. VOC emissions shall not exceed 42.2 pounds per hour and 184.9 TPY. The emission limitations established pursuant to this rule within PTI 14-4289 are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-21-07(M)	See b)(2)d.

(2) Additional Terms and Conditions

a. The hourly VOC emission limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation. Based on this hourly potential emissions rate, the unrestricted potential to emit for VOC emissions from this emissions unit, based on 8,760 hours of operation per year, is 60.18 tons per year.



- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) are equivalent to the hourly and annual emission limitations for this emissions unit based upon the uncontrolled potential to emit.
 - c. The VOC emission limitations originally established under OAC rule 3745-31-05(A)(3) in PTI 14-4289, issued 7/8/1998, represented the Lowest Achievable Emissions Rate (LAER) determination for this emissions unit conducted pursuant to the requirements of OAC rules 3745-31-21 through 27. No change to the LAER determination was made as a result of this permit modification.
 - d. The requirements of OAC rule 3745-21-07(M) are not applicable because there is/are no control device(s) for this emission unit.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each calendar year for this emissions unit:
 - a. the barrels of material processed in each operation;
 - b. the emission factor(s) in pounds per 1,000 barrels for each operation; and
 - c. the total VOC emissions, in tons per year.
- 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.
 - (2) The permittee shall submit annual reports that specify the total VOC emissions, in tons per year, from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report due by April 15th of each year.
- 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 13.74 pounds per hour and 60.18 TPY.



Draft Permit-to-Install

MillerCoors LLC

Permit Number: P0111980

Facility ID: 1409000353

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The hourly and annual emission limitations specified above are based on the emissions unit's potential to emit, the permittee-supplied emission factors, and the maximum packaging production rates of 1.301 thousand-barrels per hour and 11,400 thousand-barrels per year for this emissions unit. The permittee-supplied emission factors provided with the application for this permit modification were based upon confidential updated emissions test data from comparable brewing and packaging operations at the MillerCoors Milwaukee Brewery and AP-42 Chapter 9.12.

- g) Miscellaneous Requirements
 - (1) None.