

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Anheuser-Busch Columbus Brewery
Premise Number	01-25-04-0554
What makes this facility a Title V facility?	NOx, VOC, SO2, PE
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes.
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
None			

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		N D	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001 and B002 and B003 and B004	20% VE  0.020lb PE /mmBTU  0.127lb PE /mmBTU  1.5 lbs SO2 /mmBTU	17-07 (A)(1)  17-10 (B)(1)  17-10 (C)(1)  18-31(T)	40 CFR 52.1881 (b)(27)(ii)	n	y	y	n	n	y	n	y	n	y	n	OR: The quality of the No. 6 oil (fuel oil) burned in the 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 1.5 lbs SO2/ mmbTU of actual heat input.

P001 and P002	32.9 lbs PE/hr  20% VE	17-11 (B)(1)  17-07 (A)(1)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The permittee shall operate a fabric filter when the emissions unit is in operation.  ET: Compliance with PE limit shall be calculated by multiplying the production rate in tons/hr by the emission factor (3.0lbs PE/ton grain processed) then multiplying by the control efficiency of the fabric filter(99.7%) then multiplying by 8760 and dividing by 2000lbs/ton
P052	9.0 lbs OC /hr and 39.4 tons OC/yr	31-05 (A)(3)  PTI 01-4042  21-07(G)(2)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The permittee shall operate a condenser with a collection efficiency of 99% when the emissions unit is in operation.  ET: Compliance with limitations may be determined by multiplying the production rate in lbs/hr by the emission factor (0.045, 1992 PTI application) then multiplying by the control efficiency of the condenser (99.3%). Yearly emissions may be determined by multiplying the hourly emissions in lb/hr by 8760 hrs/yr and dividing by 2000lbs/ton.
P068	3.13 lbs OC /hr and 13.7 tons OC/yr	31-05  PTI 01-6675  21-07(G)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The maximum fill rate of packaged beer from this emissions unit shall not exceed 1,611,840 barrels per year.  ET: Compliance with the hourly emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8760 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). Compliance with the yearly limitation shall be determined by multiplying the actual annual fill rate by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged.
P069	4.75 lbs OC / hr and 20.79 lbs OC/ yr	31-05  PTI 01-6675  21-07(G)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The maximum fill rate of packaged beer from this emissions unit shall not exceed 2,969,640 barrels per year.  ET: Compliance with the hourly emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8760 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). Compliance with the yearly limitation shall be determined by multiplying the actual annual fill rate by an emission factor of 14 pounds OC per 1,000 barrels of beer packaged.

P072	3.78 lbs OC /hr and 16.53 tons OC /yr	31-05 PTI 01-7328 21-07(G)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The maximum fill rate of packaged beer from this emissions unit shall not exceed 1,944,720 barrels per year.  ET: Compliance with the hourly emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8760 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). Compliance with the yearly limitation shall be determined by multiplying the actual annual fill rate by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged.
P073	3.62 lbs OC /hr and 15.86 tons OC /yr	31-05 PTI 01-7328 21-07(G)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The maximum fill rate of packaged beer from this emissions unit shall not exceed 1,865,880 barrels per year.  ET: Compliance with the hourly emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8760 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). Compliance with the yearly limitation shall be determined by multiplying the actual annual fill rate by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged.

P075	20% VE  44.6 lbs SO/hr 23.64 lbs CO/hr 4.35 lbs NOx/hr and 8.95 lbs VOC/hr  39.47 tons SO2/rolling 12-month period 20.94 tons CO/rolling 12-month period 3.85 tons NOx/rolling 12-month period 7.92 tons VOC/rolling 12-month period	17-07 (A)(1)(a)  31-05(A)(3)  PTI 01-01282  31-05(C)	N	n	y	y	n	n	y	n	y	n	n	n	OR: 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 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 (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 cleaned, 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. 7. The permittee has existing records of the amount of biogas combusted in the flares for the past twelve months. Therefore, the first year of monthly, accumulated biogas combustion limitations are not necessary.  ET: Compliance method requirements to show compliance with limits while flaring biogas are calculated as specified in section A.V.1.
P102 and P106	20% VE  0.12lbs PE/hr and 0.51 tons PE/ yr	17-07 (A)(1)(a)  31-05 (A)(3)  PTI 01-7399  17-11 (A)(2)	N	n	y	y	n	n	y	n	y	n	n	n	OR: 1. Malt and adjunct grains transfer in Brewhouse No. 3 and Brewhouse No. 4 shall not occur without the use of fabric filters to control particulate matter emissions from any grains transfer operations. 2. The maximum allowable throughput of malt (grains) shall not exceed 30,000 pounds per hour per brewhouse. 3. The maximum allowable throughput of adjunct (grains) shall not exceed 15,000 pounds per hour per brewhouse.  ET: Compliance method requirements to show compliance with limits are calculated as specified in section A.V.1.

P103	20% VE  1.35 lbs PE/hr and 5.91 tons PE/ yr	17-07 (A)(1)(a)  31-05 (A)(3)  PTI 01-8860  17-11 (A)(2)	N	n	y	y	n	n	y	n	y	n	n	n	OR: All particulate emissions from this unit shall be vented through a fabric filter with at least 99.9% control efficiency.  ET: Compliance with the short term emission limitation shall be determined by multiplying the maximum throughput (1351 lbs grain/hr, 2004 PTI application) by lb of PE/lb of grain by the control efficiency of the filter receiver (99.9%). Compliance with the annual limit shall be determined by multiplying the hourly emissions rate (lb/hr) by the annual operating hours and dividing by tons per year.
P108	3.74 lbs OC /hr and 16.38 tons OC/yr	31-05 (A)(3)  PTI 01-7498  21-07(G)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The maximum fill rate of packaged beer from this emissions unit shall not exceed 1,927,200 barrels per year.  ET: Compliance with the hourly emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8760 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). Compliance with the yearly limitation shall be determined by multiplying the actual annual fill rate by an emission factor of 17 pounds OC per 1,000 barrels of beer packaged.
P109 and P110	5.04 lbs OC / hr and 22.08 lbs OC/ yr	31-05 (A)(3)  PTI 01-7877  21-07(G)	N	n	y	y	n	n	y	n	y	n	n	n	OR: The maximum fill 3,153,600 barrels per year.  ET: Compliance with the hourly emission limitation shall be determined by dividing the maximum restricted annual fill rate (in barrels per year) by 8760 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). Compliance with the yearly limitation shall be determined by multiplying the actual annual fill rate by an emission factor of 14 pounds OC per 1,000 barrels of beer packaged.
P111 and P112	20% VE  0.49 lbs PE/hr and 2.15 tons PE/ yr	17-07 (A)(1)(a)  31-05 (A)(3)  PTI 01-8860  17-11 (B)(1)	N	n	y	y	n	n	y	n	y	n	n	n	OR: All particulate emissions from this unit shall be vented through a fabric filter with at least 99.9% control efficiency.  ET: Compliance with the short term emission limitation shall be determined by multiplying the maximum throughput (490 lbs grain/hr, 2004 PTI application) by lb of PE/lb of grain by the control efficiency of the filter receiver (99.9%). Compliance with the annual limit shall be determined by multiplying the hourly emissions rate (lb/hr) by the annual operating hours and dividing by tons per year.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

### C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.

3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

**C** **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.