



State of Ohio Environmental Protection Agency

Street Address:

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

02/06/02

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

14-09-00-0353  
MILLER BREWING COMPANY  
MARK KOCH  
2525 WAYNE MADISON ROAD  
TRENTON, OH 45067-9760

Dear MARK KOCH:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 05/16/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency  
Jim Orlemann, Manager, Engineering Section  
Division of Air Pollution Control  
P.O.Box 1049  
Columbus, OH 43216-1049

and

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Rd  
Cincinnati, OH 45219-2660  
(513) 946-7777

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Hamilton County Dept. of Environmental Services  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**PRELIMINARY PROPOSED TITLE V PERMIT**

<b>Issue Date:</b> 02/06/02	<b>Effective Date:</b> To be entered upon final issuance	<b>Expiration Date:</b> To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 14-09-00-0353 to:  
**MILLER BREWING COMPANY**  
**2525 WAYNE MADISON ROAD**  
**TRENTON, OH 45067-9760**

**Emissions Unit ID (Company ID)/Emissions Unit Activity Description**

B001 (BOILER NO.1) BOILER NO.1, RILEY-STOKER RX16	B007 (BOILER NO. 3B) BOILER NO. 3B, E. KEELER CO.	P030 (PACKAGING) PACKAGING
B002 (BOILER NO. 2) BOILER NO. 2, RILEY-STOKER RX16	F001 (COAL HANDLING SYSTEM) COAL HANDLING SYSTEM	P031 (COLD SERVICES) BUILDING VENTS, SPENT YEAST, SURGE TANKS, VARIOUS FILTERS
B003 (BOILER NO. 3A) BOILER NO. 3A, E. KEELER CO.	P006 (BLR ASH HANDLING) BOILER ASH HANDLING SYSTEM	

You will be contacted approximately eighteen (18) 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 listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) 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 current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Rd  
Cincinnati, OH 45219-2660  
(513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **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:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.

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

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

c. 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:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

ii. 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 record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.6 below if no deviations occurred during the quarter.

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

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.  
*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iv. 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## 2. **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 condition, of any emissions unit(s) 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. (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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

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

## 3. **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.

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

## 4. **Title IV Provisions**

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

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

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

**6. 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 reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

**8. Marketable Permit Programs**

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

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

**9. Reasonably Anticipated Operating Scenarios**

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

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

**10. Reopening for Cause**

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

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

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

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- i. 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.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air 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:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

**13. Permit Shield**

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

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

**14. Operational Flexibility**

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

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

**15. Emergencies**

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

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

**16. Off-Permit Changes**

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions

or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

**17. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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

**19. Permit to Install Requirement**

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

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

**20. Air Pollution Nuisance**

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

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

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the 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 record keeping 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.)

**2. 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 this permit. Such records may be maintained in computerized form.

**3. Inspections and Information Requests**

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

**4. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

**5. Permit Transfers**

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

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

None

### B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B004 5.6 MMBtu/Hr Gas/#2 Oil Fired Boiler  
B008 8.475 MMBtu/Hr Natural Gas/Oil Boiler  
F002 Coal Storage Pile  
P001 Brewkettle #4  
P002 Brewkettle #3  
P003 Brewkettle #2  
P004 Coal Bunker #1  
P005 Coal Bunker #2  
P007 Boiler Fly Ash Silo  
P008 Boiler Bottom Ash Silo  
P009 Ash Silo - WWTP  
P010 Cereal Cooker #1  
P011 Cereal Cooker #2  
P012 Grain Unloading hopper  
P013 Grain Storage Silos  
P014 Grains Building Vacuum Cleaning System  
P015 Malt Transfer System 1  
P016 Malt Transfer System 2  
P017 Malt Transfer System 3  
P018 Grits Transfer System  
P019 Malt Milling and Weighing  
P020 Brewhouse Vacuum Cleaning System  
P024 Diatomaceous Earth Manual Transfer System  
P025 Lime Silo - WWTP  
P026 Brewkettle #1  
P027 Wet Spent Grain Loadout Tank  
P028 Lime Silo #1 Water Plant  
P029 Lime Silo #2 Water Plant  
T001 One Million Gallon Oil Storage Tank  
T004 Fuel Oil Tank  
T005 Used Oil Tank  
Z007 Brewhouse Activities - tuns, wort tanks  
Z009 Non-halogenated solvent Cold Cleaners

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** BOILER NO.1 (B001)  
**Activity Description:** BOILER NO.1, RILEY-STOKER RX16

#### A. State and Federally Enforceable Section

##### I. 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>
238 mmBtu/hr pulverized coal/fuel oil/natural gas-fired boiler w/ baghouse	OAC rule 3745-31-05(D) (PTI 18-080)	0.031 lb of particulate emissions (PE)/mmBtu of actual heat input and 0.01 grain per actual cubic foot of exhaust gases when burning coal  The SO2 emission limitation (1.6 lbs of SO2/mmBtu), when burning coal, established pursuant to this rule is less stringent than the SO2 emission limitation established pursuant to 40 CFR 52.1881(b)(12)(i).
		0.7 lb of NOx/mmBtu of actual heat input when burning coal
		See A.I.2.a.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), and 40 CFR 52.1881(b)(12)(i).  Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/mmBtu of actual heat input when burning only either No. 2 fuel oil or natural gas
OAC rule 3745-17-10(C)	The PE limitation specified by this rule is less stringent than the PE limitation established in PTI 18-080 pursuant to OAC rule 3745-31-05(D).	
	40 CFR 52.1881(b)(12)(i)	1.4 lbs of SO2/mmBtu of actual heat input when burning coal

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-15(A)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(D) and 40 CFR 52.1881(b)(12)(i).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see A.I.2.b.
	OAC rule 3745-18-06(D)	1.6 lbs of SO <sub>2</sub> /mmBtu of actual heat input when burning any fuel oil, but no coal.

**2. Additional Terms and Conditions**

- 2.a.** This emissions unit shall utilize the best design for minimizing nitrogen oxides. The design shall utilize overfire, underfire, and sidefire air to reduce flame temperature and limit combustion air (ref. PSD 5-79-A-23 FR Vol 44 No. 215 issued Nov. 5, 1979).
- 2.b** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(D) in Permit to Install 18 -080.

**II. Operational Restrictions**

- 1.** The quality of the coal burned in this emissions unit shall meet the following specifications on an as-burned basis:
  - a. A combination of ash content and heat content that is sufficient to comply with the particulate emission limitations specified in A.I.1.
  - b. A combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.4 lbs /mmBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee via monthly composite sampling.
- 2.** The quality of the oil burned in this emissions unit shall meet the following specifications:
  - a. A combination of ash content and heat content that is sufficient to comply with the particulate emission limitations of 0.020 lb PE/mmBtu when burning No. 2 fuel oil and 0.031 lb PE/mmBtu when burning No. 6 fuel oil.
  - b. A combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.4 lbs/mmBtu of actual heat input.

Compliance with the above-mentioned specifications shall be based upon the analytical results for each shipment of oil.
- 3.** The pressure drop across the baghouse shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.
- 4.** The daily average operating rate for this emissions unit shall not exceed 238 mmBtu/hr and 180,000 pounds steam per hour.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative grab sample of the coal burned in this emissions unit, at a minimum, of once every 8 hours. The sample shall be collected from the coal handling system after the crusher. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, and the average SO<sub>2</sub> emission rate for the month, in lbs/mmBtu of actual heat input (the SO<sub>2</sub> emission rate shall be calculated using the monthly coal analysis data and the equation specified in OAC rule 3745-18-04(F)).

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis.
4. The permittee shall properly operate and maintain existing equipment to continuously monitor and record the steam load, in pounds/hour, from this emissions unit.

Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous steam load monitoring system designed to ensure continuous valid and representative readings of steam load, in pounds of steam/hour. The plan shall include a description of preventive maintenance activities. A logbook dedicated to the continuous steam monitoring system must be kept on site and be available for inspection during regular office hours.

5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
  - d. the total duration of any visible emission incident or estimate thereof; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports concerning the quality and quantity of coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal burned (tons);
  - b. the average ash content (percent) of the coal burned;
  - c. the average sulfur content (percent) of the coal burned;
  - d. the average heat content (Btu/pound) of the coal burned; and
  - e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal burned. This calculation shall be performed using the equation specified out in OAC rule 3745-18-04(F).

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide limitation specified in Section A.I.1 for the fuel oil burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.
4. The permittee shall submit quarterly steam load deviation (excursion) reports that identify all periods of time during which the steam load exceeded 180,000 lbs of steam per hour.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
6. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These 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.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitations:  
0.031 lb of PE/mmBtu of actual heat input and 0.01 grain per actual cubic foot when burning coal:

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above PE emission limitations based upon the results of the emission testing required in Section V.2 of this permit.

**V. Testing Requirements (continued)**

- 1.c** Emission Limitation:  
.020 lb of PE/mmBtu of actual heat input when burning either No. 2 fuel oil or natural gas

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- 1.d** Emission Limitation:  
0.7 lb of NOx/mmBtu of actual heat input when burning coal

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above NOx emission limitation based upon the results of the emission testing required in Section V.2 of this permit.

- 1.e** Emission Limitation:  
1.4 lbs of SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and record keeping requirements in Section A.III.1 and the reporting keeping requirements in Section A.IV.1 of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

- 1.f** Emission Limitation:  
1.6 lbs of SO<sub>2</sub>.mmBtu of actual heat input when burning any fuel oil, but no coal

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and record keeping requirements in Section A.III.2 and the reporting requirements in Section A.IV.2 of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following instructions:

a. The emission testing for shall be conducted within 6 months of issuance of this permit, approximately 2 - 2.5 years after permit issuance, and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for PE of 0.031 lb PE/MMBtu and the allowable mass emission limitation for NOx of 0.7 lb/MMBtu when burning coal.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

Methods 1 - 5 of 40 CFR Part 60, Appendix A for particulates, and Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A for NOx.

d. During the test, the temperature, and the pressure drop across the baghouse shall be recorded at least every 15 minutes.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

f. The permittee shall conduct, or have conducted, a heat input measurement evaluation and ultimate analysis of the coal fed to this emissions unit, and shall collect and record the following data from the evaluation and ultimate analysis:

i. the coal feed to the boiler, by weight, during each stack test run and the total amount of coal used during the entire stack test (from the beginning of the first test run to the end of the third test run, (i.e., about eight hours);

ii. the coal feed counter readings during each test run and for the duration of the entire stack test (i.e., about eight hours);

iii. the ultimate analysis of the coal; and

iv. the F-factor for each stack test run (as a QA/QC check) per Ohio EPA Engineering Guide #27.

The permittee shall calibrate the steam flow meter in advance of the heat input measurement evaluation and shall maintain records of the steam flow meter calibration.

Facility Name: **MILLER BREWING COMPANY**  
Facility ID: **14-09-00-0353**  
Emissions Unit: **BOILER NO.1 (B001)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** BOILER NO. 2 (B002)  
**Activity Description:** BOILER NO. 2, RILEY-STOKER RX16

**A. State and Federally Enforceable Section**

**I. 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>
238 mmBtu/hr pulverized coal/fuel oil/natural gas-fired boiler w/ baghouse	OAC rule 3745-31-05(D) (PTI 18-080)	0.031 lb of particulate emissions (PE)/mmBtu of actual heat input and 0.01 grain per actual cubic foot of exhaust gases when burning coal  The SO2 emission limitation (1.6 lbs of SO2/mmBtu), when burning coal, established pursuant to this rule is less stringent than the SO2 emission limitation established pursuant to 40 CFR 52.1881(b)(12)(i).  0.7 lb of NOx/mmBtu of actual heat input when burning coal  See A.I.2.a.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), and 40 CFR 52.1881(b)(12)(i).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/mmBtu of actual heat input when burning only either No. 2 fuel oil or natural gas
	OAC rule 3745-17-10(C)	The PE limitation specified by this rule is less stringent than the PE limitation established in PTI 18-080 pursuant to OAC rule 3745-31-05(D).
	40 CFR 52.1881(b)(12)(i)	1.4 lbs of SO2/mmBtu of actual heat input when burning coal

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-15(A)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(D) and 40 CFR 52.1881(b)(12)(i).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see A.I.2.b.
	OAC rule 3745-18-06(D)	1.6 lbs of SO <sub>2</sub> /mmBtu of actual heat input when burning any fuel oil, but no coal.

**2. Additional Terms and Conditions**

- 2.a.** This emissions unit shall utilize the best design for minimizing nitrogen oxides. The design shall utilize overfire, underfire, and sidefire air to reduce flame temperature and limit combustion air (ref. PSD 5-79-A-23 FR Vol 44 No. 215 issued Nov. 5, 1979).
- 2.b** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(D) in Permit to Install 18 -080.

**II. Operational Restrictions**

- 1.** The quality of the coal burned in this emissions unit shall meet the following specifications on an as-burned basis:
  - a. A combination of ash content and heat content that is sufficient to comply with the particulate emission limitations specified in A.I.1.
  - b. A combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.4 lbs /mmBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee via monthly composite sampling.
- 2.** The quality of the oil burned in this emissions unit shall meet the following specifications:
  - a. A combination of ash content and heat content that is sufficient to comply with the particulate emission limitations of 0.020 lb PE/mmBtu when burning No. 2 fuel oil and 0.031 lb PE/mmBtu when burning No. 6 fuel oil.
  - b. A combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.4 lbs/mmBtu of actual heat input.

Compliance with the above-mentioned specifications shall be based upon the analytical results for each shipment of oil.
- 3.** The pressure drop across the baghouse shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.
- 4.** The daily average operating rate for this emissions unit shall not exceed 238 mmBtu/hr and 180,000 pounds steam per hour.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative grab sample of the coal burned in this emissions unit, at a minimum, of once every 8 hours. The sample shall be collected from the coal handling system after the crusher. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, and the average SO<sub>2</sub> emission rate for the month, in lbs/mmBtu of actual heat input (the SO<sub>2</sub> emission rate shall be calculated using the monthly coal analysis data and the equation specified in OAC rule 3745-18-04(F)).

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis.
4. The permittee shall properly operate and maintain existing equipment to continuously monitor and record the steam load, in pounds/hour, from this emissions unit.

Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous steam load monitoring system designed to ensure continuous valid and representative readings of steam load, in pounds of steam/hour. The plan shall include a description of preventive maintenance activities. A logbook dedicated to the continuous steam monitoring system must be kept on site and be available for inspection during regular office hours.

5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports concerning the quality and quantity of coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal burned (tons);
  - b. the average ash content (percent) of the coal burned;
  - c. the average sulfur content (percent) of the coal burned;
  - d. the average heat content (Btu/pound) of the coal burned; and
  - e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal burned. This calculation shall be performed using the equation specified out in OAC rule 3745-18-04(F).

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide limitation specified in Section A.I.1 for the fuel oil burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.
4. The permittee shall submit quarterly steam load deviation (excursion) reports that identify all periods of time during which the steam load exceeded 180,000 lbs of steam per hour.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
6. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These 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.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitations:  
0.031 lb of PE/mmBtu of actual heat input and 0.01 grain per actual cubic foot when burning coal:

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above PE emission limitations based upon the results of the emission testing required in Section V.2 of this permit.

**V. Testing Requirements (continued)**

- 1.c** Emission Limitation:  
.020 lb of PE/mmBtu of actual heat input when burning either No. 2 fuel oil or natural gas

Applicable Compliance Method:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- 1.d** Emission Limitation:  
0.7 lb of NOx/mmBtu of actual heat input when burning coal

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above NOx emission limitation based upon the results of the emission testing required in Section V.2 of this permit.

- 1.e** Emission Limitation:  
1.4 lbs of SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and record keeping requirements in Section A.III.1 and the reporting keeping requirements in Section A.IV.1 of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

- 1.f** Emission Limitation:  
1.6 lbs of SO<sub>2</sub>.mmBtu of actual heat input when burning any fuel oil, but no coal

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and record keeping requirements in Section A.III.2 and the reporting requirements in Section A.IV.2 of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following instructions:

a. The emission testing for PE shall be conducted within 6 months of issuance of this permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit expiration. The emission testing for NO<sub>x</sub> shall be conducted within 6 months of issuance of this permit and approximately every 12 months thereafter.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for PE of 0.031 lb PE/MMBtu and the allowable mass emission limitation for NO<sub>x</sub> of 0.7 lb/MMBtu when burning coal.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

Methods 1 - 5 of 40 CFR Part 60, Appendix A for particulates, and  
Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A for NO<sub>x</sub>.

d. During the test, the temperature, and the pressure drop across the baghouse shall be recorded at least every 15 minutes.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

f. The permittee shall conduct, or have conducted, a heat input measurement evaluation and ultimate analysis of the coal fed to this emissions unit, and shall collect and record the following data from the evaluation and ultimate analysis:

i. the coal feed to the boiler, by weight, during each stack test run and the total amount of coal used during the entire stack test (from the beginning of the first test run to the end of the third test run, (i.e., about eight hours);

ii. the coal feed counter readings during each test run and for the duration of the entire stack test (i.e., about eight hours);

iii. the ultimate analysis of the coal; and

iv. the F-factor for each stack test run (as a QA/QC check) per Ohio EPA Engineering Guide #27.

The permittee shall calibrate the steam flow meter in advance of the heat input measurement evaluation and shall maintain records of the steam flow meter calibration.

Facility Name: **MILLER BREWING COMPANY**

Facility ID: **14-09-00-0353**

Emissions Unit: **BOILER NO. 2 (B002)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** BOILER NO. 3A (B003)  
**Activity Description:** BOILER NO. 3A, E. KEELER CO.

**A. State and Federally Enforceable Section**

**I. 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>
49 mmBtu/hr fuel oil/natural gas-fired boiler	OAC rule 3745-31-05(D) (PTI 18-080)	0.8 lb of SO <sub>2</sub> /mmBtu of actual heat input, on a 24-hour average basis  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 17-10(B)(1), 17-10(C)(1), and 40 CFR 52.1881(b)(12)(i).
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity, as a 6-minute average.
	OAC rule 3745-17-10(B)(1)	.020 lb of PE/mmBtu of actual heat input when burning only No. 2 fuel oil or natural gas
	OAC rule 3745-17-10(C)(1)	0.25 lb of PE/mmBtu of actual heat input when burning No. 6 fuel oil
	OAC rule 3745-18-06(D)	The SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-18-06(D) is less stringent than the SO <sub>2</sub> emission limitation established in PTI 18-080 pursuant to OAC rule 3745-31-05(D).

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

1. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:
  - a. A combination of ash content and heat content that is sufficient to comply with the particulate emission limitations of 0.020 lb of PE/mmBtu of actual heat input when burning No. 2 fuel oil and 0.25 lb of PE/mmBtu of actual heat input when burning No. 6 fuel oil.
  - b. A combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.8 lb of SO<sub>2</sub>/mmBtu of actual heat input.

Compliance with the above-mentioned SO<sub>2</sub> limitation shall be ensured by demonstrating that each shipment of oil meets the limitation.

## III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

2. When burning #6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

## IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1.1 of this permit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These 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.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

- 1.a** Emission Limitation:  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b** Emission Limitations:  
0.020 lb of PE/mmBtu of actual heat input when burning either No. 2 fuel oil or natural gas  
0.25 lb of PE/mmBtu of actual heat input when burning No. 6 fuel oil

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of No. 6 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 10 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- 1.c** Emission Limitation:  
0.8 lb of SO<sub>2</sub>/mmBtu of actual heat input, on a 24-hour average basis

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and/or record keeping requirements in Section A.III and the reporting requirements in Section A.IV of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** BOILER NO. 3B (B007)  
**Activity Description:** BOILER NO. 3B, E. KEELER CO.

**A. State and Federally Enforceable Section**

**I. 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>
49 mmBtu/hr fuel oil/natural gas-fired boiler	OAC rule 3745-31-05(D) (PTI 18-080)	0.8 lb of SO <sub>2</sub> /mmBtu of actual heat input, on a 24-hour average basis  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 17-10(B)(1), 17-10(C)(1), and 40 CFR 52.1881(b)(12)(i).
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity, as a 6-minute average.
	OAC rule 3745-17-10(B)(1)	.020 lb of PE/mmBtu of actual heat input when burning only No. 2 fuel oil or natural gas
	OAC rule 3745-17-10(C)(1)	0.25 lb of PE/mmBtu of actual heat input when burning No. 6 fuel oil
	OAC rule 3745-18-06(D)	The SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-18-06(D) is less stringent than the SO <sub>2</sub> emission limitation established in PTI 18-080 pursuant to OAC rule 3745-31-05(D).

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

1. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:
  - a. A combination of ash content and heat content that is sufficient to comply with the particulate emission limitations of 0.020 lb of PE/mmBtu of actual heat input when burning No. 2 fuel oil and 0.25 lb of PE/mmBtu of actual heat input when burning No. 6 fuel oil.
  - b. A combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.8 lb of SO<sub>2</sub>/mmBtu of actual heat input.

Compliance with the above-mentioned SO<sub>2</sub> limitation shall be ensured by demonstrating that each shipment of oil meets the limitation.

## III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

2. When burning #6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

## IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1.1 of this permit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These 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.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

- 1.a** Emission Limitation:  
Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b** Emission Limitations:  
0.020 lb of PE/mmBtu of actual heat input when burning either No. 2 fuel oil or natural gas  
0.25 lb of PE/mmBtu of actual heat input when burning No. 6 fuel oil

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

For the use of No. 6 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 10 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- 1.c** Emission Limitation:  
0.8 lb of SO<sub>2</sub>/mmBtu of actual heat input, on a 24-hour average basis

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO<sub>2</sub> emission limitation based on the monitoring and/or record keeping requirements in Section A.III and the reporting requirements in Section A.IV of this permit. The SO<sub>2</sub> emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** COAL HANDLING SYSTEM (F001)  
**Activity Description:** COAL HANDLING SYSTEM

#### A. State and Federally Enforceable Section

##### I. 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>
coal unloading from railcars or trucks; coal conveyors; coal crushers; coal transfer	OAC rule 3745-31-05(D) (PTI 18-080)	There shall be no visible fugitive emissions from the coal handling system's track hopper, crusher, and/or transfer tower, except for 2 minutes in an hour during which the visible fugitive emissions shall not exceed 20% opacity.
		Prior to storing coal outside of the coal bunkers (K5 to the storage pile), the permittee shall install and utilize a foam suppression system in the coal handling operation to control fugitive dust when the coal handling system is being utilized.
		Should the permittee begin to store coal outside of the coal bunkers, the inactive storage pile shall be compacted and sprayed with water prior to use. See Misc. Section VI.1.
	OAC rule 3745-17-07(B)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1) and 17-08(B). The visible emission limitation specified in OAC rule 3745-17-07(B)(1) is less stringent than the visible emission limitation established in PTI 18-080.
	OAC rule 3745-17-08(B)	reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. (See Section A.I.2.a.)

## 2. Additional Terms and Conditions

- 2.a** No person shall cause or permit any fugitive dust source to be operated, or any materials to be handled or transported without taking or installing reasonably available control measures (RACM) to prevent fugitive dust from becoming airborne. Such reasonably available control measures for this emissions unit shall include, but not be limited to: the use of foam suppressants at the transfer points specified in Section A.1.2.b if coal is stored outside of the coal bunkers; and the use of total and partial enclosures for the transfer points and conveyors specified in Section A.1.2.b.
- 2.b** The following conveyors and transfer points shall be controlled by employing RACM:

Conveyor/Transfer Point	RACM
Unload belt conveyors, K1 and K2	Enclosure
Reclaim belt conveyor, K9	Enclosure
Crusher belt conveyor, K3	Enclosure
Transfer belt conveyor, K4	Enclosure
Loadout belt conveyor, K5	Wind guards
Bunker belt conveyor	Enclosure
Transfer from K1, K2, K9 to crusher belt conveyor, K3	Foam suppressants
Transfer from crusher K3	Foam suppressants
Transfer from K4 to transfer tower	Foam suppressants
Transfer from K5 to storage pile	Foam suppressants

The reference number (Kx) for each conveyor and transfer point corresponds to the drawing submitted to the Hamilton County Department of Environmental Services on April 14, 1993.

## II. Operational Restrictions

None

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible fugitive particulate emissions from the coal handling system. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
- the location and color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive emissions were observed from the coal handling system and (b) describe any corrective actions taken to eliminate the visible fugitive 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.

## V. Testing Requirements

1. Emission Limitation:  
No visible fugitive dust emissions from the coal handling system, except for 2 minutes in an hour not to exceed 20% opacity

Applicable Compliance Method:

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

## **V. Testing Requirements (continued)**

2. Should the permittee begin to store coal outside of the coal bunkers, the foam suppression system required in A.I.1. shall be evaluated for its effectiveness within 3 months of its installation. The foam suppression system shall be examined to determine whether or not the installation of a lowering chute will be required, as was specified in the Permit to Install 18-080, to minimize particulate emissions.

The staged evaluation shall be as follows:

- a. The loading of coal onto the coal pile shall occur with foam being applied at the rail unloading hoppers and conveyor, reclaim hopper conveyor, and crusher conveyer in the crusher house. These points shall be observed and evaluated for compliance with the visible emissions limitation specified in this permit through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
- b. If the visible emission limitation specified in Section A.I.1. cannot be met, additional foam lines at the end of the load-in chute shall be installed.
- c. If the additional foam lines at the end of the load-in chute are not adequate to control fugitive dust emissions, a telescoping lowering chute shall be purchased and installed for the coal handling operation.
- d. Additional foam nozzles, if required from the evaluation required in Section A.III.1, shall be obtained and installed within two weeks of the date of receipt of written notification to the Hamilton County Department of Environmental Services of the need for an expanded foam suppression system.
- e. The telescoping chute, if required, shall be ordered, delivered, and installed within twelve weeks of the date of written notification to the Hamilton County Department of Environmental Services of the need for a telescoping chute.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** BLR ASH HANDLING (P006)  
**Activity Description:** BOILER ASH HANDLING SYSTEM

#### A. State and Federally Enforceable Section

##### I. 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>
boiler ash handling systems with cyclones and baghouse and fly ash and bottom ash silos with filters	OAC rule 3745-31-05(D) (PTI 18-080)	There shall be no visible fugitive emissions from the fly ash and bottom ash handling systems, and fly ash and bottom ash silo filters except for 2 minutes in an hour during which the visible fugitive emissions shall not exceed 20% opacity.
		Particulate emissions (PE) from the baghouse stack controlling the fly ash and bottom ash handling systems shall not exceed 0.56 grain per actual cubic foot of exhaust gases. (This grain loading limitation is equivalent to 9 pounds of PE per hour at 1860 actual cubic feet per minute.)
		Filters shall be employed at all times to control particulates from the displaced air from the fly ash and bottom ash silos.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-08(B). Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-07(B)(1)	The visible emission limitation specified in OAC rule 3745-17-07(B)(1) is less stringent than the visible emission limitation established in PTI 18-080 pursuant to OAC rule 3745-31-05(D).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-08(B)	reasonably available control measures to minimize or eliminate visible emissions of fugitive dust (See Section A.I.2.a.)
	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the limitation established in PTI 18-080 pursuant to OAC rule 3745-31-05(D).

## 2. Additional Terms and Conditions

- 2.a No person shall cause or permit any fugitive dust source to be operated, or any materials to be handled or transported without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures for this emissions unit shall include, but are not limited to the use of enclosures, cyclones, a baghouse and fly ash and bottom ash silo filters.

## II. Operational Restrictions

1. This emissions unit shall not be operated without the use of the cyclones and the baghouse.
2. The trucks used for the disposal of boiler ash shall be covered.
3. The pressure drop across the baghouse shall be maintained within the range of 1 - 6 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall inspect the following items on a weekly basis while the emissions unit is in operation:
  - a. all air pollution control ductwork located on the outside of the buildings, for leaks, holes, or other damage;
  - b. all joints and fittings located outside of the buildings, for leaks or improper sealing; and
  - c. the baghouse unit, for leaks or visible emissions.
2. The permittee shall record the following data from the weekly inspections described above:
  - a. the date and time of the inspection required pursuant to Section A.III.1;
  - b. the name of the person conducting the each inspection;
  - c. a notation of any problems observed (if no problems were observed, a note shall be made stating this);
  - d. a description of any measure(s) taken to correct any problem(s); and
  - e. the date that each problem was corrected.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
4. The permittee shall continue to operate and maintain the existing outdoor video camera/monitor which is directed at the fly ash and bottom ash handling systems and monitored in the boiler control room. The video camera/monitor shall be operated at all times when this emissions unit is in operation. (The video camera/monitor is used to monitor for the presence or absence of visible emissions which may indicate a failure of the fabric filter).

### **III. Monitoring and/or Record Keeping Requirements (continued)**

5. The permittee shall perform visual inspections of the fly ash and bottom ash handling systems to determine that the enclosure is in tact, and that the cyclones, and baghouse are in good working order. The video camera/monitor described above shall be used for the visual inspections (observations). The visual inspections shall be performed every 2 hours and, at a minimum, the following information shall be recorded:
- a. the date and time of the observation;
  - b. the presence and the location of any visible particulate emissions;
  - c. the cause of the visible particulate emissions; and
  - d. the corrective action taken to eliminate the visible particulate emissions.

The above-mentioned inspections shall be performed during representative, normal operating conditions.

6. The permittee shall perform checks for visible fugitive particulate emissions from the building entrance during the unloading operations for bottom/fly ash. (The video camera/monitor described above shall not be used for these checks for visible fugitive particulate emissions.) The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 eliminate the visible emissions.
7. The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible fugitive particulate emissions from the fly ash and bottom ash silo filters serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 eliminate the visible emissions.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports summarizing the information in Section A.III.2. for all days during the calendar quarter when any problem was recorded.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
3. The deviation reports shall be submitted in accordance with the General Term and Condition A.1.c.ii of this permit.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions were observed from the fly ash and bottom ash handling systems based on the record keeping in Section A.III.4 and (b) describe any corrective actions taken to eliminate the visible 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.
5. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive emissions were observed from the entrance to the building housing this emissions unit while unloading fly/bottom ash and (b) describe any corrective actions taken to eliminate the visible fugitive 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.

#### IV. Reporting Requirements (continued)

6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the filters were not in place to control particulates from the displaced air from the fly ash and bottom ash silos when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
7. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive emissions were observed from the silo filters serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive 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.

#### V. Testing Requirements

1. Emission Limitation:  
No visible fugitive dust emissions from the fly ash handling system (including silo filters), except for 2 minutes in an hour not to exceed 20% opacity.

Applicable Compliance Method:

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

2. Emission Limitation:  
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

3. Emission Limitation:  
0.56 grain of PE per actual cubic foot of exhaust gases from the baghouse

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable PE grain loading (0.56 grain of PE per actual cubic foot from the baghouse).
  - c. The following test methods shall be employed to demonstrate compliance with the allowable PE emission limitation: Method 1-5 of 40 CFR, Part 60, Appendix A.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - e. A PE test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 1-5 of 40 CFR, Part 60, Appendix A shall be employed.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Facility Name: **MILLER BREWING COMPANY**

Facility ID: **14-09-00-0353**

Emissions Unit: **BLR ASH HANDLING (P006)**

#### **V. Testing Requirements (continued)**

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** PACKAGING (P030)  
**Activity Description:** PACKAGING

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. 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>
packaging of brewery products	OAC rule 3745-31-05 (PTI 14-4289, LAER)	42.2 lbs of organic compounds (OC)/hour 184.9 tons of OC/year  See Section A.I.2.a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	See Section A.II.1.

##### 2. Additional Terms and Conditions

- 2.a The 184.9 tons per year emission increase at Miller Brewing was offset by a shutdown of a facility in Butler County which had actual emissions of 441 tons per year, based on 1993 and 1994 emission data. At a rate of 1.2 tons of emissions offset per ton emitted at Miller Brewing, the overall change in OC emissions is a reduction of 219 tons per year.
- 2.b The 42.2 lbs of OC/hr limit includes emissions from all the equipment comprising emissions unit P030, including bottle and can filling, beer dumping, and the bottle wash and keg-o-matic lines.

##### II. Operational Restrictions

1. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The company identification of each liquid organic material employed in this emissions unit.
  - b. The total number of barrels of material processed.
  - c. The total OC emissions, in pounds per month, calculated as follows:

Total OC emissions (lbs/month) = [36.16 lbs OC per 1,000 barrels processed\*] x [barrels of material processed (from section b)]

\* This is an emission factor based on information supplied by the permittee, by letter dated September 11, 1997.

- d. The number of hours the emissions unit was in operation.
  - e. The average hourly OC emissions (c/d), in lbs/hr (average).
2. The permittee shall maintain records for each liquid organic material employed in this emissions unit that indicate whether or not each material is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly OC emission limitation of 42.2 lbs.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

### V. Testing Requirements

1. Compliance with the hourly emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:  
42.2 lbs/hr of OC\* and 184.9 TPY of OC

Applicable Compliance Method:  
The permittee shall demonstrate compliance with the OC emission limitation above based on the recordkeeping requirements established pursuant to Section A.III.1.e of this permit.

\* This limit was established by multiplying the packaging area emission factor (lbs OC/1000 barrels processed) by the maximum hourly process rate for this emissions unit (in barrels).

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** COLD SERVICES (P031)

**Activity Description:** BUILDING VENTS, SPENT YEAST, SURGE TANKS, VARIOUS FILTERS

**A. State and Federally Enforceable Section**

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

1. 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>
cold service operation	OAC rule 3745-31-05(A)(3) (PTI #14-4776)	1.35 lbs of organic compound (OC)/hour 5.93 TPY of OC
	OAC rule 3745-21-07(G)(2)	This emissions unit is exempt from the requirements of this rule because ethanol is not a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). See A.II.1.

**2. Additional Terms and Conditions**

- 2.a The 1.35 lbs of OC/hr limit includes emissions from all the equipment comprising emissions unit P031, including building vents, fermentation, spent yeast, surge tanks, and various filters.

**II. Operational Restrictions**

1. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The company identification of each liquid organic material employed in this emissions unit.
  - b. The total number of barrels of material processed.
  - c. The total OC emissions, in pounds per month, calculated as follows:

Total OC emissions (lbs/month) = [1.51 lbs OC per 1,000 barrels processed\*] x [barrels of material processed (from section b)]

\* This is an emission factor based on information supplied by the permittee in the application for PTI #14-4776 (Ethanol Emissions Table), 5/26/99.

- d. The number of hours the emissions unit was in operation.
  - e. The average hourly OC emissions (c/d), in lbs/hr (average).
2. The permittee shall maintain records for each liquid organic material employed in this emissions unit that indicate whether or not each material is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly OC emission limitation of 1.35 lbs.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

### V. Testing Requirements

1. Compliance with the hourly emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:  
1.35 lbs/hr of OC and 5.93 TPY of OC

Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be based on the record keeping requirements in Section A.III.1.e of this permit.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. 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>
cold service operation		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit, P031, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Ethanol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 1.35

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17

MAGLC (ug/m3): 44762

### **III. Monitoring and/or Record Keeping Requirements (continued)**

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

Facility Name:  
Facility ID:  
Emissions Unit:

Facility Name:  
Facility ID:  
Emissions Unit:

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