

## AIR PERMIT REVIEW

APPLICANT	SITE LOCATION	COUNTY
Miller Breweries East, Inc.	Eden	Rockingham

CONTACT	PHONE
Quinton Hancock Environmental Compliance Engineer	(336) 627-2592

APPLICATION FOR	EXISTING P/N
Renewal	03116T16

APP No.	REVIEWER	SIGNATURE	DATE
7900090.03A	William Willets, P.E.		August ????, 2005

RECOMMENDATION and COMMENT	FEE CLASS
Issue Permit # 03116T17	Title V

### 1. Purpose of Application

This revision is for the renewal of an existing Title V permit pursuant to 2Q .0513 and a change of ownership (App. No. 7900090.04A). The existing Title V permit (03116T16) was issued on May 22, 2001 and is currently scheduled to expire on June 30, 2004. The renewal application was received on October 1, 2003 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

### 2. Facility Description

Miller Breweries East, Inc. (MBE) operates a malt beverage manufacturing facility at this Eden site. Operations include grain drying, brewing, beer packaging, package labeling, and support facilities (i.e. boilers and waste water treatment).

This facility is a Title V facility because potential sulfur dioxide and nitrogen oxides emissions from the four No. 2 fuel oil, No. 6 fuel oil, and/or coal-fired boilers are greater than 100 tons per year. In addition, potential VOC emissions from various operations (primarily beer packaging) are greater than 100 tons per year. Finally, potential emissions of hydrogen chloride and hydrogen fluoride (hazardous air pollutants or HAPs) from coal combustion are each greater than 10 tons per year with potential emissions of total HAPs greater than 25 tons per year.

### 3. Application Chronology

**October 1, 2003** – Renewal application was received by the Division of Air Quality (DAQ), Winston-Salem Regional Office (WSRO).

**October 7, 2003** – Renewal application was received by the DAQ, Raleigh Central Office (RCO). Permit application was considered complete as of October 1, 2003.

**November 12, 2003** – Met with Miller Brewing and ENSR re. CAM alternatives to COMS monitoring.

**June 4, 2004** – Ownership change application was received by the DAQ RCO. Permit application was considered complete as of June 4, 2004.

**June 24, 2004** – CAM addendum to the October 1, 2003 application was received by the DAQ RCO.

#### 4. Permit Modification/Changes

The initial Title V permit (03116T14) was issued on July 16, 1999. Subsequent to the initial Title V permit, two modifications were issued as permits 03116T15 and 03116T16.

An administrative amendment resulted in Permit No. 03116T15. This amendment corrected a typographical error in Specific Condition 2.1 A. 1. c. ii. ESP inspections were corrected from semi-annually to annually.

Revisions reflected in Permit No. 03116T16, pursuant to 2Q .0523, 502(b)(10) changes were:

- a. Remove from permit one wastewater treatment plant flyash storage silo (ID No. ES22) which is no longer being used.
- b. For No. 2 fuel oil-fired boiler (ID No. ES-6, 5.6 million Btu per hour heat input), modify the permit language to reflect no monitoring, recordkeeping, or reporting for both 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources and 15A NCAC 2D .0521, Control of Visible Emissions. No. 2 fuel oil is a clean burning fuel and will always be less than the emission limits of 2.3 pounds of sulfur dioxide per million Btu and 20 percent opacity.

The following table represents the changes to the current Title V permit:

Page No.	Condition No.	Change
Cover Letter	NA	Changed Responsible Official from Martin J. Costello, Vice President of Engineering to Michael T. Jones, Vice President and Secretary. Changed name from Miller Brewing Company to Miller Breweries East, Inc. Changed mailing address from Milwaukee, WI to Eden, NC.
Cover Letter	NA	Updated cover letter and added: The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.
Page 1	Title Page	Updated text.
Page 4	Part I	Updated text.
Page 4	Part I, Section 1, Table	Removed ES11, ES12, ES14 and ES21 and placed them on the insignificant activities list. Removed ES22 that was taken out of service. Added ES34 and ES36 that were previously thought to be insignificant.
Page 4	Part I, Section 1, Table	Corrected heat input for boilers ES1 and ES2.
Page 5	Part I Section 2.1 A. Table	Corrected 2D .0503 limit for boilers ES1 and ES2 based on new heat input.
Page 5	Part I Section 2.1 A. Table	Added Compliance Assurance Monitoring to the list of applicable requirements.
Page 6	Part I Section 2.1 A. 1.	Added ESP monitoring for compliance with 2D .0503.
Page 8	Part I Section 2.1 A. 4.	Added Compliance Assurance Monitoring stipulations.
Page 14	Part I Section 2.1 E.	Removed references to 40 CFR 52 Subpart II (formerly 2D .0518(d)).
Page 15	Part I Section 3	Updated all General Conditions

## 5. Regulatory Review

The facility is subject to the following regulations:

2D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

2D .0515 "Particulates From Miscellaneous Industrial Processes"

2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

2D .0521 "Control Of Visible Emissions"

2D .0614 "Compliance Assurance Monitoring (40 CFR Part 64)"

2D .0958 "Work Practices for Sources of Volatile Organic Compounds"

2D .1806 "Control And Prohibition Of Odorous Emissions"

No regulatory review is required at this time, except for the applicability of compliance assurance monitoring (see below) and the removal of 40 CFR 52 Subpart II, "North Carolina Implementation Plan" VOC requirements.

2D .0958 "Work Practices for Sources of Volatile Organic Compounds"

Permit No. 03116T16 contains generic VOC requirements under 40 CFR 52 Subpart II, "North Carolina Implementation Plan" (formerly 15A NCAC 2D .0518(d)). As there are no other VOC control requirements arising from the repealed 2D .0518(d), these requirements will be removed. The current VOC work practice standards under 2D .0958 will be retained in the permit.

## 6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

### NSPS

New Source Performance Standards (NSPS) do not apply to this facility.

### NESHAP/MACT

This facility is not currently subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP). The existing coal and fuel oil-fired boilers (ES-1, ES-2, ES-3 and ES-6) will be subject to the Industrial, Commercial and Institutional Boilers and Process Heaters NESHAP (40 CFR 63 Subpart DDDDD). The compliance date for this NESHAP is September 13, 2007. Initial notification for the NESHAP was due not later than 120 days after November 12, 2004. The notification was received on March 14, 2005.

### PSD

This facility is an existing major Prevention of Significant Deterioration (PSD) source.

### Attainment Status

This facility is located in Rockingham County, which is an 8-hour ozone non-attainment county. Rockingham County is in attainment for all other pollutants according to 2D .0902.

### 112(r)

From the May 11, 2005 inspection report prepared by Ray Stewart of WSRO:

This facility is subject to Program Level 3 of Section 112(r) of the Clean Air Act. They store more than the threshold amount of ammonia on site. Mr. Stewart and Mr. Michael Chapman conducted a 112(r) inspection on December 16, 1999. The facility was found to be in

compliance with the requirements of Section 112(r) of the Clean Air Act during that inspection. The facility met the June 21, 2004 requirement to revise and resubmit it's RMP to the EPA RMP Reporting Center.

**CAM**

Compliance Assurance Monitoring (CAM) (40 CFR Part 64) applies for particulate matter from the electrostatic precipitator (ESP) controlled, coal-fired boilers (ID Nos. ES1 and ES-2). The facility performed particulate matter testing on these boilers while varying power inputs and field "outages" to the ESPs. This testing allowed Miller to determine the minimum ESP power and number of fields needed to meet the particulate matter standard under 2D .0503. These values have been incorporated into the permit for the CAM requirements.

The following table summarizes other controlled emission sources at the facility that are not subject to CAM requirements.

Emission Source ID No.	Emission Source/Control Device Description	Pollutant Controlled	Before Control PTE (tpy)
ES4	<p>one boiler ash handling system</p> <p>CD4A - one air washer (7.1 square feet of collection surface area) installed on the boiler bottom ash exhaust and the flyash exhaust from the electrostatic precipitators,</p> <p>CD4B - one bagfilter (84 square feet of filter area) installed on the bottom ash silo, and</p> <p>CD4C - one bagfilter (84 square feet of filter area) installed on the flyash silo</p>	PM-10	31.1
ES13	<p>two steam-heated brewer's grain dryers</p> <p>CD13A &amp; CD13B - two cyclones (5 feet in diameter, each) installed, one each, on the grain dryers</p>	PM-10	5.4
ES15	<p>one brewhouse cleaning vacuum system</p> <p>CD15A &amp; CD15B - two bagfilters (86 square feet of filter area, each) installed, one each, in series with two cyclones (30 inches in diameter, each) on the grain storage and brewhouse vacuum system</p>	PM-10	< 21.6

Emission Source ID No.	Emission Source/Control Device Description	Pollutant Controlled	Before Control PTE (tpy)
ES21	one wastewater treatment plant lime storage silo  CD21 - one bagfilter (160 square feet of filter area) installed on the lime storage silo	PM-10	< 5 tpy ????

**7. Facility Wide Air Toxics**

There are no toxic air pollutant requirements in the permit. Besides the boiler MACT, there are no MACT requirements that would trigger a facility-wide TAP compliance demonstration.

**8. Facility Compliance Status**

The facility was inspected by Ray Stewart, WSRO on April 28, 2005. The facility was considered to be in compliance with all requirements.

**9. Statement of Compliance**

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

**10. Facility Emissions Review**

There is no change in emissions for this renewal.

**11. Stipulation Review**

All stipulations are standard for this type of facility.

**12. Public Notice / EPA and Affected State Review**

Pursuant to 2Q .0521, a notice of the draft Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The Miller facility is located approximately one mile from the Virginia-North Carolina border making Virginia an affected state.

**13. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this renewal.

Miller Breweries East  
August ????, 2005

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit per Ray Stewart's review received XX, XX.

RCO concurs with WSRO's recommendation to issue air permit.