

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Anheuser-Busch – Cartersville Brewery**

City: Cartersville

County: Bartow

AIRS #: 04-13-015-00061

Application #: TV-16923

Date SIP Application Received: N/A

Date Title V Application Received: September 14, 2006

Permit No: 2082-015-00061-V-02-1

Program	Review Engineers	Review Managers
SSPP	S. Ganapathy	Richard McDonald
SSCP	Marc McDonald (Mountain Dist.)	Stacy Wix
ISMP	Daniel McCain	DeAnna Oser
TOXICS	n/a	n/a

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2082-015-00061-V-02-0	September 13, 2005	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
2082-015-00061-V-02-0	Renewal Title V Permit for the Cartersville Brewery

B. Regulatory Status

1. PSD/NSR/RACT

This facility is major under PSD regulations and went through a PSD review in order to obtain their initial air quality permit. All the BACT limits from the PSD permit were incorporated in the facility's existing (renewal) Title V permit. As a major source of NOx and VOC in the expanded Metro Atlanta Non-Attainment area the facility was subject to NOx and VOC RACT under state rules (yy) and (tt) respectively. Anheuser Busch submitted NOx and VOC RACT plans to EPD in September 2000 and November 2000 respectively for review and approval. For VOC no additional control was proposed as the VOC RACT for the facility. On January 24, 2002 EPD informed the Permittee that no additional control was RACT for VOC.

For the NOx RACT EPD informed the Permittee that no additional add-on control equipment is needed under Rule (yy). The NOx RACT that was approved consisted of annual tune-ups for all four steam boilers at the facility. The NOx RACT also restricted the fuel use to natural gas in the boilers during the summer ozone season unless the gas supply to the facility was curtailed by the gas supplier.

The area has been designated as non-attainment for the 8-hour ozone national ambient air quality standards (NAAQS) and the fine particulate (PM_{2.5}) NAAQS.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
SO ₂	✓	✓		
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

The Permittee has requested changes to the wording of Condition 6.1.7 b (ii) in order to make it consistent with Condition 3.4.1. Thus, any fuel oil fired in boilers during the summer ozone season is an exceedance only if the natural gas supply to the boilers is not interrupted.

The Permittee requested addition of language to the excursion Condition 6.1.7 c, specifying that a valid operating hour is one in which the boiler operates for more than 30 minutes during the clock hour and includes at least two data points with each representing a 15 minute period.

The Permittee also requested EPD to revise Attachment B of the permit to correctly identify existing insignificant activities. The requested change does not contain a new process, emission unit or change in method of operation for the Cartersville Brewery.

B. Emissions Change

The requested changes to permit condition wording does not result in any change in actual or potential emission of any contaminant.

C. PSD/NSR Applicability

The proposed changes are not subject to PSD or NSR. No new equipment will be installed. The modification involves clarification in the exceedance and excursion reporting condition 6.1.7 b. and c. defining a valid operating hour. Clarifying language was added to Condition 6.2.3 as to when firing of fuel oil in the boilers during the summer ozone season would constitute an excursion.

III. Facility Wide Requirements

The proposed changes do not involve any facility wide requirements

A. Emission and Operating Caps

No new or modified facility wide caps or limits on emissions, hours of operation, etc. result from the proposed change.

B. Applicable Rules and Regulations

No facility wide rules and regulations are associated with this minor permit amendment.

- Rules and Regulations Assessment – Not Applicable.
- Emission and Operating Standards – Not Applicable.

C. Compliance Status

Not Applicable.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

No new and modified facility wide permit conditions are included in Part 2.0 of the Title V permit in this permit amendment.

IV. Regulated Equipment Requirements

A. Brief Process Description

Please refer to the facility's existing permit narrative for a brief process description. There is no change to the process description in this permit amendment.

B. Equipment List for the Process

There is no change to existing Equipment List for the production process at the Cartersville Brewery.

C. Equipment & Rule Applicability

- Emission and Operating Caps – There are no changes to the existing emission and operating caps in the facility's existing permit.

- Applicable Rules and Regulations -

There is no change Applicable Rules and Regulations to the Cartersville Brewery.

Rules and Regulations Assessment: Not Applicable

Emission and Operating Standards: There is no change to any existing emission or operating standards.

D. Compliance Status

There is no change to the facility's compliance status.

E. Operational Flexibility

No operational flexibility was requested in this permit amendment.

F. Permit Conditions

There are no new permit conditions to Section 3.0 of the permit in this permit amendment.

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: This amendment does not require any new performance test for individual equipment at the facility.

B. Equipment Groups (all subject to the same test requirements): Not Applicable.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: This Permit Amendment does not require any new monitoring for individual equipment at the Cartersville Brewery. **Monitoring of fuel oil consumption in the boilers during the summer ozone season is required when the natural gas supply to the boilers is not curtailed** since it constitutes an excursion that needs to be recorded and reported.

B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable.

VI. Other Record Keeping and Reporting Requirements

Condition 6.1.7 b(ii) is amended by **adding language that clarifies that burning of fuel oil in the boilers at the facility during the summer ozone season is an exceedance only if there is no interruption in natural gas supply to the boilers.**

Excursion Condition 6.1.7 c(i) and (ii) are **amended by defining a valid operating hour as a clock hour in which the boiler operates for at least 30 minutes and contains at least two data points of oxygen concentration with each point representing a 15 minute period.**

VII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Not Applicable

C. Insignificant Activities

The Insignificant Activity Checklist (Appendix B) permit has been updated in this permit amendment.

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Not Applicable.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Prevention of Accidental Releases

This modification does not change the source's applicability to Prevention of Accidental Releases.

J. Stratospheric Ozone Protection Requirements

This modification does not change the source's applicability to Title VI.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

Not Applicable.

Addendum to Narrative

The 45-day EPA review started on November 16, 2006 and ended on January 1, 2007. Comments were not received by the Division. No change was made to the permit amendment proposed to EPA.