

Facility Name: **Anheuser-Busch, LLC**  
City: Cartersville  
County: Bartow  
AIRS #: 04-13-015-00061

Application #: TV-489029  
Date Application Received: August 4, 2020  
Permit No: 2082-015-0061-V-05-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification**

1. Facility Name: Anheuser-Busch, LLC.
2. Parent/Holding Company Name: Anheuser-Busch Companies, LLC.
3. Previous and/or Other Name(s): Anheuser-Busch, LLC, Anheuser-Busch – Cartersville Brewery, Anheuser-Busch Inc.
4. Facility Location: 100 Busch Drive NE  
Cartersville, Georgia 30121
5. Attainment, Non-attainment Area Location, or Contributing Area:

The facility is in the Metro-Atlanta non-attainment area. The area has been designated as non-attainment for the 8-hour ozone national ambient air quality standards (NAAQS)

**B. Site Determination**

The site includes the brewhouse and a wastewater treatment plant which is located about a half mile away from the brew house, on the other side of an interstate highway. The wastewater plant is under common control with the brewery and supplies biogas for combustion in the brewery's steam boilers. It is therefore, connected by pipeline. However, since it was once operated by the City of Cartersville, which held an air quality permit for the facility, it has a separate AFS number. Both the brewery (AFS No. 015-00061) and the wastewater treatment plant (AFS No. 015-00069) are covered by the same Title V permit.

There are no other facilities which could possibly be contiguous or adjacent and under common control.

**C. Existing Permits**

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2082-015-0061-V-04-0	2/5/2016	Title V permit renewal
Off-Permit Change	8/4/2020	Adding a craft beer production line with emissions below exemption level.

Off-Permit Change	12/4/2020	Modify operations to produce seltzer products. Installation of an injection building, 5 sucrose bulk storage tanks, two horizontal, fixed roof stainless steel flavoring tanks, two yeast brinks, and ingredient storage.
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#### D. Process Description

##### 1. SIC Codes(s)

###### 2082 – Malt Beverage Manufacturing

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

##### 2. Description of Product(s)

This facility is a complete beer brewery and produces malt beverages.

##### 3. Overall Facility Process Description

This facility is a complete brewery, manufacturing beer and has overall capacity of 9.0 MMbbl/year. The malt beverage production process consists of fermentation, lagering, finishing and packaging. Raw ingredients such as barley malt, hops, and cereal grains are received, stored, conveyed and cooked. To produce products with new flavors, Anheuser-Busch – Cartersville Brewery is injecting, [by VOC-Containing Flavor Application System (Emission Unit ID No. FLA01)], certain new VOC-containing flavors into products at the existing Finishing Process (Emission Unit I.D. No. B003) via connecting the flavor containers to the existing flavor injection equipment.

Steam for processing is provided by gas fired steam boilers. The finished products are canned or bottled on site. A wastewater treatment plant located nearby, supplies biogas for firing the process steam boilers.

##### 4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

## E. Regulatory Status

## 1. PSD/NSR

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 initial Title V permit and are carried over in the renewed permit.

The record indicates that the facility being a major source of NO<sub>x</sub> and VOC in the Atlanta Non-Attainment area, the facility is subject to NO<sub>x</sub> and VOC RACT under state rules (yy) and (tt) respectively. Anheuser Busch submitted NO<sub>x</sub> and VOC RACT plans to EPD in November 2000 and September 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.

Also, for the NO<sub>x</sub> RACT, EPD made a determination that no additional add-on control equipment is needed under Rule (yy). The NO<sub>x</sub> RACT that was approved consisted of annual tune-ups for all four steam boilers at the facility. The NO<sub>x</sub> RACT also restricted the fuel use to natural gas in the steam boilers during the summer ozone season unless the facility was curtailed by the gas supplier.

## 2. Title V Major Source Status by Pollutant

Table 2: 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 <sub>10</sub>	✓	✓		
PM <sub>2.5</sub>	✓	✓		
SO <sub>2</sub>	✓	✓		
VOC	✓	✓		
NO <sub>x</sub>	✓	✓		
CO	✓	✓		
TRS	✓			✓
H <sub>2</sub> S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

### 3. MACT Standards

This facility is not subject to any proposed or final MACT Standards.

Note that since Anheuser-Busch has reclassified their all four steam boilers as gas-fired steam boilers per 40 CFR 63.11237 as of 12/31/2014, therefore, the facility is not subject to area sources steam boiler GACT; 40 CFR Part 63 Subpart JJJJJJ– *National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Steam boiler Area Sources*.

### 4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Y
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	N
Program Code M – Part 63 NESHAP	N
Program Code V – Title V	Y

## **Regulatory Analysis**

### **II. Facility Wide Requirements**

#### **A. Emission and Operating Caps:**

None applicable.

#### **B. Applicable Rules and Regulations**

None applicable.

#### **C. Compliance Status**

Review of forms of the permit application indicates that the facility does not have any Non-Compliant Emission Unit or Group.

#### **D. Permit Conditions**

None applicable.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SB01	Steam Boiler No. 1 (99 MMBtu/hr)	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g), 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy)	None	N/A
SB02	Steam Boiler No. 2 (99 MMBtu/hr)	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g), 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy)	None	N/A
SB03	Steam Boiler No. 3 (99 MMBtu/hr)	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g), 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy)	None	N/A
SB04	Steam Boiler No. 4 (99 MMBtu/hr)	40 CFR 52.21, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g), 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy)	None	N/A
B001	Fermentation	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A
B002	Lagering (Aging)	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A
B003	Finishing	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A
B004	Packaging	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A
BERS	Brewery wastewater pretreatment system	391-3-1-.02(2)(b)	FL01, FL02, BIO1	BERS Flare No. 1 BERS Flare No. 2 Bio filter No. 1
FLA01	VOC-Containing Flavor Application System	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A
CB01	Specialty Grains Handling Building	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A
SY01	Spent yeast handling	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt)	None	N/A

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

#### B. Equipment & Rule Applicability

The brewery is subject to Georgia Rule (tt), however the permit does not have any specific VOC RACT condition since the VOC RACT analysis submitted by the Permittee in September 2000 concluded that VOC control technologies are neither technically feasible nor cost effective. EPD agreed with those conclusions and communicated the same in a letter dated January 24, 2002.

The four steam boilers are subject to NO<sub>x</sub> and VOC RACT requirements under Rule (yy) and (tt).

### Emission and Operating Caps:

As indicated in the narrative for initial Title V Permit No. 2082-015-0061-V-01-0, “Emissions from all the four steam boilers are limited for particulate matter, nitrogen oxides and opacity. Particulate matter emissions are limited to 0.10 lbs/MMBtu heat input and nitrogen oxide emissions are limited to 0.30 lbs/MMBtu heat input when firing natural gas and 0.40 lbs/MMBtu heat input when firing fuel oil. The opacity of emissions are restricted to 20 percent. Each of these restrictions is the result of a Best Available Control Technology (BACT) analysis, which was required for this facility since it is subject to PSD regulations. A limit of 0.70 percent sulfur in the fuel oil burned is also required due to BACT.”

As indicated in the narrative for Title V Permit Amendment No. 2082-015-0061-V-03-1, Permittee requested an annual emission cap of 34.0 tons for the VOC emissions (primarily ethanol) from this modification, i.e., VOC- Containing Flavor Application System FLA01. This emission cap is equal to the potential VOC emissions from FLA01. This process/source specific emission cap represents a reasonably available control technology (RACT) limit for VOC emission from FLA01 under Georgia Rule (tt) and establishes the facility-wide ethanol emission level used in an ambient impact assessment conducted for this modification. The assessment/dispersion modeling demonstrates that after this modification the facility/brewery will be in compliance with EPD’s policy regarding emissions of toxic air pollutants under Rule 391-3-1-.02(2)(a)3(ii).

### Rules and Regulations Assessment:

As indicated in the narrative for initial Title V Permit No. 2082-015-0061-V-01-0, “40 CFR 52.21, the federal "Prevention of Significant Deterioration" regulations applied to the initial construction of this facility. The brewery has four steam boilers each rated at 99 million Btu per hour heat input, totaling 396 million Btu per hour. Facilities which have fossil fuel fired steam boilers totaling more than 250 million Btu per hour are major sources, by definition, under PSD regulations if they potentially emit more than 100 tons per year of a regulated pollutant. Once PSD regulations are triggered by any pollutant, other pollutants are considered to be emitted in significant quantities, if they are emitted above certain specified levels. The Best Available Control Technology (BACT) must be employed for each pollutant emitted in significant quantities. This usually includes the imposition of an emission limit in the permit for that pollutant. The original PSD permit issued to Anheuser-Busch included nitrogen oxide, particulate matter and opacity limits on the steam boiler emissions as well as the fuel oil sulfur limit.”

As indicated in the narrative for initial Title V Permit No. 2082-015-0061-V-02-0, “The facility is now subject to the NOx and VOC RACT requirements under State Rules (yy) and (tt) respectively since it is located in a contributing area. The facility is located in an area that is designated as non-attainment for 8- hour ozone NAAQS and fine particulate PM 2.5 NAAQS. VOC RACT rules do not result in any new requirements or add on controls on the sources at the Cartersville brewery. The NOx RACT requirements consist of annual steam boiler tune- ups and the requirement to burn only natural gas in all the four steam boilers during the summer ozone months unless the gas supply to the steam boiler(s) is curtailed by the gas supplier. VOC RACT rules impose no new conditions on the steam boilers or the brewery sources at the facility.”



**391-3-1-.02 (2)(tt) – VOC Emissions from Major Sources**

As indicated in the narrative for Title V Permit Amendment No. 2082-015-0061-V-03-1, this rule requires reasonably available control technology (RACT) to control VOC emissions from any facility located in Bartow County that has potential VOC emissions greater than 100 tpy. In 2002 the Division made a determination on a RACT analysis conducted by the Permittee in 2000 that no add-on control was RACT for the VOC emissions from the existing facility/brewery under Rule (tt). The Permittee submitted a RACT analysis for the VOC emissions from FLA01 with the application for the modification. The results of the RACT analysis indicated that implementations of add-on control for the VOC emissions from FLA01 were not economically cost effective. The Division concurs with the conclusion of this RACT analysis. Therefore, no add-on control is considered as RACT for VOC emissions from FLA01.

**391-3-1-.02 (2)(yy) – Emissions of Nitrogen Oxides from Major Sources**

This rule applies to sources in Bartow County (part of the 20-county ozone nonattainment area around Atlanta) with the potential to emit greater than 100 tpy NOx. NOx RACT plans were submitted to EPD in September 2000 for review and approval. The NOx RACT that was approved consists of annual tune-ups for all four (4) steam boilers at the facility, and restricts fuel use to natural gas in the steam boilers during the summer ozone season unless the facility is curtailed by the gas supplier.

**391-3-1-.02 (2)(d) – Fuel Burning Equipment**

This rule limits particulate matter and opacity emissions from certain fuel-burning equipment. This rule is applicable to the four (4) steam boilers and the 18 building heaters. Particulate matter emissions for fuel burning equipment greater than 10 MMBtu/hr and less than 250 MMBtu/hr are limited by the equations specified in the rule.

Particulate matter emissions for fuel burning equipment less than 10 MMBtu/hr are limited to 0.5 lb/MMBtu. The 18 building heaters have a maximum heat input of less than 1.0 MMBtu/hr each, therefore PM emissions are limited to 0.5 lb/MMBtu. The combustion of natural gas in these units ensures compliance with this rule. Opacity emissions are limited to 20%, with one 6-minute period of not more than 27%. The combustion of only natural gas, biogas, and No. 2 fuel oil ensures compliance with this rule.

As indicated in the narrative for initial Title V Permit No. 2082-015-0061-V-01-0, Georgia Rule d), parts 2 and 3 apply to the steam boilers located at this facility. Part 1 of this Rule doesn't apply since this entire facility was constructed after January 1, 1972. Georgia Rule (d)2.(ii) limits particulate matter emissions from all four steam boilers at this facility according to the equation specified in this rule for steam boilers whose heat input is between 10 and 250 million Btu per hour.

Based upon heat inputs of 99 MMBTU per hour, each of Anheuser-Busch's steam boilers would have a particulate matter limit of 0.158 lbs per million Btu. However, a more restrictive limit of 0.10 lbs per million Btu required by condition 3.3.1a, due to the BACT requirements of PSD. Part 3 of Rule (d) includes a 20 percent opacity limit which applies to all fuel burning sources constructed after January 1, 1972, regardless of size. Part 4 of Rule (d) does not apply since all of the fuel burning equipment at this facility has heat inputs of less than 250 million Btu per hour.

**391-3-1-.02 (2)(g) – Sulfur Dioxide**

This regulation limits the sulfur content of the fuels used in combustion to 2.5%. As indicated in the narrative for initial Title V Permit No. 2082-015-0061-V-01-0, Georgia Rule (g) “Sulfur Dioxide” applies to all fuel burning sources capable of burning fossil fuel. However, part 1 of the Rule is inapplicable since there are no fuel burning sources at this facility with heat inputs of greater than 250 million BTUS per hour. All four steam boilers at this facility are limited to burning fuel containing no more than 3 percent sulfur, by weight, although condition 3.3.2 limits fuel oil sulfur content to only 0.70 percent. This is also due to BACT requirements.

With regard to the 99 MMBtu/hr steam boilers, this regulation is subsumed by Permit Condition No. 3.3.2, which limits the fuel fired in the four (4) steam boilers to natural gas, biogas, or No. 2 fuel oil (0.5% sulfur content). With regard to the building heaters, the combustion of natural gas ensures compliance with this rule.

Note that Condition No. 3.3.2 is revised based on the comments received from the Mountain District Office-Cartersville. The comments regarding burning of No. 2 fuel oil are as under:

*“3.3.2 and others: This facility, like almost all facilities now, fires diesel fuel oil grade 2-D S15 (a.k.a. ultra-low sulfur diesel, not No. 2 fuel oil. diesel fuel oil grade 2-D S15 meets ASTM D975. No. 2 fuel oil meets ASTM 396. Please address this fuel in this permit and all future permits.”*

In view of above Condition No. 3.3.2 is revised to address this issue and few other places this reference was added.

**391-3-1-.02 (2)(e) – Particulate Emissions from Manufacturing Processes**

This regulation is applicable to emission units that have the potential to generate PM, except in cases where another rule or regulation might make a more stringent requirement. All process equipment other than the four (4) steam boilers and the building heaters are subject to this rule as these units are not subject to a more restrictive PM emissions limit. As indicated by the facility, these processes are in compliance with this rule.

**391-3-1-.02(2)(b) – Visible Emissions**

This rule limits opacity from emission points and structures to 40%, except in cases where another rule or regulation might make a more stringent requirement. All process equipment, other than the four (4) steam boilers which are subject to 20% opacity per Georgia Rule (d), are subject to this rule as these units are not subject to a more restrictive opacity limit. As indicated by the facility, all processes with the potential to emit particulate matter are in compliance with this rule.

**C. Permit Conditions**

Condition 3.2.1, which had been added by Permit Amendment No. 2082-015-0061-V-03-1, establishes the RACT emission limit under Rule (tt) for the VOC emissions from FLA01. As indicated in the narrative for this amendment the emission cap in Condition 3.2.1 also ensures that the ambient impact of the toxic air pollutants (presuming ethanol) emitted from the whole brewery after the start-

up of FLA01 be acceptable, as determined using the Division's *Guideline for Ambient Impact Assessment of Toxic Air Pollutants* developed per Georgia Rule 391-3-1-.02(2)(a)3(ii). Thus Condition No. 3.2.1 is the same as in existing Condition 3.2.1.

Condition No. 3.3.1 limits particulate matter emissions to 0.10 lbs/MMBtu heat input, nitrogen oxide emissions to 0.30 lbs/MMBtu heat input when firing natural gas, 0.40 lbs/MMBtu heat input when firing oil. These same limitations are contained in existing permit, which were required by the PSD regulations, and were carried over without change into the existing renewal permit. This condition is the same as existing permit condition 3.3.1.

Condition No. 3.3.2 requires the Permittee to fire only gaseous fuel and No. 2 fuel oil (and/or ultra-low sulfur diesel oil) in all steam boilers. This condition is similar to the existing permit condition 3.3.2.

New Condition No. 3.3.3 requires the Permittee to fire only gaseous fuel and fuel oil in gas curtailment period. This is a new condition included in this Title V Renewal for the avoiding the applicability of Subpart JJJJJ, as the facility has reclassified all steam boilers as gas fired steam boilers.

Condition No. 3.4.1 requires the Permittee not to fire No. 2 fuel oil in all steam boilers during ozone season from May 1 to September 30 each year, per GA Rule (yy) and (rrr)5. This condition is the same as existing permit condition 3.4.1.

Condition No. 3.4.2 limits the opacity of emissions from steam boilers to twenty (20) percent. This condition is the same as existing permit condition 3.4.2.

Condition No. 3.4.3 limits the opacity of emissions from brewery sources to forty (40) percent. This condition is the same as existing permit condition 3.4.3.

Condition No. 3.5.1 requires routine maintenance on all air pollution control devices and is the same as existing permit condition 3.5.1.

Condition No. 3.5.2 requires spare bags for baghouses to be kept on hand and is the same as existing permit condition 3.5.2.

**IV. Testing Requirements (with Associated Record Keeping and Reporting)****A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

**B. Specific Testing Requirements**

None of the applicable regulations require specific performance testing; therefore testing was not required for any of the emissions units. However, the permit does contain a condition that the Division can require that a performance test be conducted to determine compliance with the emissions limits contained in Part 3.0 of the permit. Test methods for determining emissions are listed in Condition 4.1.3. These conditions are the same as in the existing permit.

**V. Monitoring Requirements****A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

**B. Specific Monitoring Requirements**

Condition No. 5.2.1 requires monitoring and recording of the oxygen concentration in the exhaust gas during each day of operation of the steam boilers. This is same as existing permit Condition 5.2.1.

Condition No. 5.2.2 requires the Permittee to perform annual tune-ups of the four steam boilers (SB01-SB04) at this facility while burning natural gas or biogas so as to be consistent with the terms of approval of NO<sub>x</sub> RACT plan for the steam boilers. Note that Part c of this condition had required the use of a conditional test method for determining NO<sub>x</sub> and oxygen concentrations. EPA has recommended the use of ASTM Method D-6522 and this condition was changed to require this method via Permit Amendment No. 2082-015-0061-V-02-2. A search of EPA's website for CTM-30 will lead to a referral to Method D-6522.

**C. Compliance Assurance Monitoring (CAM)**

Not Applicable .

## **VI. Record Keeping and Reporting Requirements**

### **A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

### **B. Specific Record Keeping and Reporting Requirements**

Conditions 6.2.1 and 6.2.2 require Permittee to maintain fuel oil receipts provided by the fuel supplier. Condition 6.2.3 requires submission of a semi-annual report for the fuel oil fired in the steam boilers. The supplier sulfur content reports are required to be certified by the responsible official for the facility. This condition records all periods during which No. 2 fuel is fired in any steam boiler during the summer ozone season. These are the same conditions as existing permit conditions 6.2.1, 6.2.2 and 6.2.3.

Conditions No. 6.2.4 through 6.2.6 require the Permittee to keep record of product formulations used in flavoring; determine total monthly VOC emissions from the flavoring emission source FLA01. These conditions were added to establish the record keeping, emission calculation/compliance determination and reporting requirements deemed necessary to make the 34.0 tpy VOC emission limit in Condition 3.2.1 practically enforceable. These conditions are same as existing permit Conditions 6.2.4, 6.2.5 and 6.2.6.

Condition 6.2.7 requires the Permittee to keep records of all instances as and when fuel oil is fired in steam boilers.

## **VII. Specific Requirements**

### **A. Operational Flexibility**

- The applicant did not include any alternative operating scenarios in their Title V Renewal Application. The facility's existing Title V Permit does not have any operational flexibility conditions and no new operational flexibility conditions are included in this Title V Renewal Permit.

### **B. Alternative Requirements**

- The facility has not requested any new alternative requirements under Rule 391-3-1-.03(10)(d)8 to combine multiple overlapping of state and federal requirements. This permit does not contain any alternative requirement conditions.

### **C. Insignificant Activities**

See Permit Application on GEOS website.  
See Attachment B of the permit

### **D. Temporary Sources**

- None Applicable.

### **E. Short-Term Activities**

- None Applicable.

### **F. Compliance Schedule/Progress Reports**

- None Applicable.

### **G. Emissions Trading**

- None Applicable.

### **H. Acid Rain Requirements**

- None Applicable.

### **I. Stratospheric Ozone Protection Requirements**

The facility has indicated that they are subject to Title VI. This facility has air conditioners or refrigeration equipment that uses CFC's, HFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. Therefore, the facility is subject to 40 CFR Part 82, Subpart A-"Production and Consumption Control", Appendix A and B. The Title V permit

application further indicates that the facility do have air conditioner or any piece of refrigeration equipment that contain refrigerant charge of greater than 50 lbs.; but the facility personnel do not maintain, service, repair or dispose of any motor vehicle air conditioners (MVAC's) or appliances. Therefore, the facility is not subject to 40 CFR 82, Subpart B-“Servicing of Motor Vehicle Air Conditioners.”

J. Pollution Prevention

- None applicable.

K. Specific Conditions

- None applicable.



**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

**Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//