

**Louisville Metro Air Pollution Control District**  
**850 Barret Ave., Louisville, Kentucky 40204**

**Construction Statement of Basis**

**Company:** Brown-Forman Distillery

**Plant Location:** 2921 Dixie Highway

**Date Application Received:** 08/06/2015

**Application Number:** 72879

**Date of Draft Permit:** 08/14/2015

**District Engineer:** Rick Williams

**Permit No:** C-0244-15-V

**Plant ID:** 0244

**SIC Code:** 2085

**NAICS:** 312140

**Introduction:**

This permit will be issued pursuant to District Regulation 2.03, *Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements*. Its purpose is to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for the 1997 standard for particulate matter less than 2.5 microns (PM<sub>2.5</sub>), unclassifiable for the 2012 standard for particulate matter less than 2.5 microns (PM<sub>2.5</sub>) and partial non-attainment for sulfur dioxide (SO<sub>2</sub>).

**Application Type/Permit Activity:**

- Initial Issuance
- Permit Revision
  - Administrative
  - Minor
  - Significant
- Permit Renewal
- Construction

**Compliance Summary:**

- Compliance certification signed
- Source is out of compliance
- Compliance schedule included
- Source is operating in compliance

**I. Source Information**

1. **Plantwide Overall Process Description:** The company manufactures and ages distilled beverage alcohol products.
2. **Project Description:** The source intends to construct an emergency generator whose driving engine is natural gas-fired and rated at 97.7 BHP.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Construction No.	Equipment Description
C-0244-15-V	Natural gas-fired emergency generator, rated at 97.7 BHP. Cummins, model GGHE, 60 kW-e output

5. **Permit Revisions**

Revision No.	Permit No.	Issue Date	Change Type	Change Scope	Description
Initial	C-0244-15-V	XX-XX-2015	Initial	Entire Permit	Initial Permit Issuance

6. **Fugitive Sources:** There are no fugitive emissions for this project.
7. **Plantwide Emission Summary:**

Pollutant	District Calculated Actual Emissions (tpy) 2014 Data	Major Source Pollutants (based on PTE)
CO	40.8	No
NO <sub>x</sub>	68.2	Yes
SO <sub>2</sub>	218	Yes
PM <sub>10</sub>	19.9	No
VOC	1863	No
Total HAPs	9.8	No
Single HAP > 1 tpy	8.6	No

**8. Applicable Requirements:**

PSD       40 CFR 60       SIP       40 CFR 63  
 NSR       40 CFR 61       District-Origin       Other

**9. MACT Requirements:**

N/A

**10. Referenced Federal Regulations in Permit:**

40 CFR 60, Subpart JJJJ; 40 CFR 63, Subpart ZZZZ

**II. Regulatory Analysis**

- 1. Acid Rain Requirements:** This equipment is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- 3. Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
- 4. 40 CFR Part 64 Applicability Determination:** This project and affected equipment is not major for any criteria pollutant. In accordance with 40 CFR 64, Compliance Assurance Monitoring for Major Stationary Sources, the source is not required to propose a CAM plan based on current process and control device requirements and practices.
- 5. Basis of Regulation Applicability**
  - a. Plant-wide**
    - i. Regulation 2.03, section 10, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to APCD upon request.

- ii. The Federal regulations reference above apply to natural gas-fired engines for emergency generators. There are no applicable state or local regulations.

**b. Standards/Operating Limits**

- i. Unit Operation:
  - (1) Emergency engines are limited to 100 hours of operation annually for non-emergency use by 40 CFR 60.4243(d)(2), but have no limits on the hours of operation for emergency use, as specified in 40 CFR 60.4243(d)(1).
  - (2) If the engine is not certified by the manufacturer to meet the emission standards of 40 CFR 60, subpart JJJJ the owner or operator is required to perform testing to demonstrate compliance with those standards by §60.4243(f).
- ii. Nitrogen Oxides: Table 1 of 40 CFR 60, subpart JJJJ specifies the NO<sub>x</sub> emission standard for natural gas-fired RICE engines.
- iii. Carbon Monoxide: Table 1 of 40 CFR 60, subpart JJJJ specifies the CO emission standard for natural gas-fired RICE engines.

**III. Other Requirements**

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operational flexibility for these emission points.
5. **Compliance History:** The Company has no compliance issues.
6. **Calculation Methodology:** Emission factors are taken from manufacturer's guarantees in published literature. These values are based on tests conducted by an independent laboratory to obtain certification that the engine complies with federal standards.
7. **Insignificant Activities:** There are no insignificant activities contained in this construction permit.
8. **Permit Fee:** The permit fees are based on the significant permit revision (construction) fee for a Title V source. The total permit fee is \$2582.58.