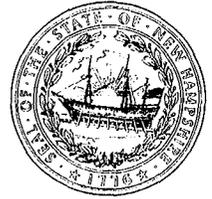




The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

September 30, 2008

Mr. Thomas Blake  
Manager, Environmental Health and Safety  
Anheuser Busch Inc.  
221 Daniel Webster Highway  
Merrimack, NH 03054

**RE: Inspection Report for Anheuser Busch Inc., 221 Daniel Webster Highway,  
Merrimack, NH**

Dear Mr. Blake:

The New Hampshire Department of Environmental Services, Air Resources Division completed an Off-Site Compliance Inspection at your facility on September 30, 2008. Enclosed is a copy of the Inspection Report for your records.

There were no deficiencies found during the inspection.

If you have any questions, please feel free to me at (603) 271-6228 or Tara E. Olson, Compliance Section Supervisor at (603) 271-4625.

Sincerely,

Raymond A. Walters  
Compliance Measurement and Data Programs Manager  
Air Resources Division

Enclosure

cc: D. McCray, Chairman Board of Selectman - Merrimack



**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF ENVIRONMENTAL SERVICES  
AIR RESOURCES DIVISION**

**Off-Site Full Compliance Evaluation Report**

**Anheuser Busch, Inc.  
221 Daniel Webster Highway  
Merrimack, NH 03054**

**AFS # 3301100017**

**Report Date: September 30, 2008**

## I. Inspection

On September 30, 2008, the New Hampshire Department of Environmental Services, Air Resources Division (DES), completed an off-site full compliance evaluation (FCE) of Anheuser Busch, Inc. (ABI), located in Merrimack, NH. ABI was inspected in accordance with the EPA's Compliance Monitoring Strategy. It was last inspected in 2006. During the on-site inspection completed in 2006, ABI was found to be in compliance. DES recommended several minor changes to ABI's annual compliance certification reports.

Off-site review completed: September 30, 2008  
Type of Inspection: Off-site Full Compliance Evaluation  
Reviewed by: Raymond Walters  
Source Contact(s): Thomas Blake – EHS Environmental Manager, 603-595-1214

## II. Facility/Process Description

ABI's Merrimack Brewery is a 1,000,000 square-foot facility built in 1970. In July 2008, Anheuser Busch agreed to a purchase offer from InBev SA, a Belgian company that is the second largest brewery owner in the world. The offer still needs the approval of regulators and both companies' shareholders. The Merrimack facility employs approximately 450 employees and operates 24 hours a day, seven days a week with 3 shifts. ABI is a Title V source due to the combustion pollutants it emits from its three boilers and the VOC emissions, predominantly ethyl alcohol, from the brewing process.

ABI produces beer from barley malt, cereal grains (adjuncts), water, hops, and yeast. The brewery has 4 process unit areas; grains handling, malt beverage production, utilities operations (steam and power plant), and a primary stage anaerobic wastewater treatment process (Bio Energy Recovery System, or BERS Process) which produces biogas for combustion in either Boiler 2 or 3, or in a flare in case one or both of the Boilers are unavailable. All areas emit one or more regulated pollutants.

### Grains Handling

The grains handling area includes equipment for unloading, storing, and conveying grains that have been received by the facility, and milling and weighing of the grains prior to being introduced into the mash cookers. The facility uses baghouses for the collection and transfer of particulate matter generated by the grains handling activities. The collective emissions from the baghouses are less than 1,000 pounds per year, and the devices are not considered pollution control equipment, but part of the process. The baghouses in the Diatomaceous Earth Process, which are used in unloading, storing, and conveying diatomaceous earth to the brewing process, and in the Alternate Chill-Proofing Process, are also considered process equipment and not pollution control equipment.

### Malt Beverage Production

During the brewing process, the milled grains are blended with water and heated in mash cookers, generating emissions of volatile organic compounds (VOCs). The cooking converts the complex starches in the grains to fermentable sugars. The cooked mash is then transferred to two lauter turns, where spent grains are separated from the resulting liquid, or wort, and small amounts of VOCs are

emitted. The wort is then transferred to one of the two brew kettles, where hops are added and the wort is boiled, generating more VOCs.

After the brewing operation, the hot wort is cooled to the "pitching" (yeast addition) temperature. The wort is sent to cold wort settlers, where "cold break" trub (coagulated protein) settles out. The trub is flushed out of the bottom of the tank and the cold wort is pumped to fermentation tanks. Fermentation is initiated by the addition of the yeast. The yeast converts the fermentable sugars in the wort to primarily ethanol and carbon dioxide. In some cases, fermentation is done as a two-step process, or "primary" and "secondary" fermentations. Sometimes both steps occur in the same fermentation tank or sometimes the liquid is transferred, after primary fermentation, to a different tank for secondary fermentation. In secondary fermentation, beechwood chips are added to aid in the natural fermentation process by providing increased surface area for yeast suspension. Beechwood chips are about an inch and a half wide by a foot long and removed and cleaned and reused in the process. After the "secondary" fermentation is complete, the beer is decanted off and transferred to the finishing area.

#### Ancillary Operations

The yeast is transferred from the yeast brinks, which are tanks where the yeast is stored under controlled conditions, to the fermentation tanks. The yeast can be reused in a limited number of consecutive fermentations before it begins to degrade and can change the flavor of the product. Spent yeast from the fermentation process is collected and either returned to the yeast brink for reuse, or sent to the spent yeast brink.

The beechwood chips are reused several times in the process after thorough cleaning and sterilization. First, the chips are removed from the chip tanks and placed in cylindrical "torpedo" vessels. Then, the chips are washed with water to remove excess yeast. After the chips have been used several times, the chips are discarded in the spent beechwood chip dumpster.

#### Packaging Operations

After finishing, the beer is sent to packaging where bottles, cans, and kegs are filled. The bottle and can filling process is similar - the container is first filled with carbon dioxide (CO<sub>2</sub>) which is displaced as beer flows into the container. Prior to closing, any oxygen is purged from the headspace of the container with a small CO<sub>2</sub> or water jet. Kegs are similarly filled through a single valve, with an initial fill of CO<sub>2</sub> followed by the product.

Emissions of CO<sub>2</sub> and ethanol occur during the filling process. The CO<sub>2</sub> displaced during filling contains a small amount of ethanol due to contact with the beer. Floor drains beneath the fillers remove spilled beer. However, ethanol is emitted from this process loss. Returnable bottles are washed in a soaker to remove old labels and to clean, rinse, and sterilize them prior to reuse. Ethanol may be emitted from volatilization of any beer remaining in the bottles.

Packaging operations have 2 bottle lines, 2 can lines, and 1 draft or keg line. Maximum potential annual beer production at the facility is 4,500,000 barrels packaged. The highest annual amount of beer packaged to date has been 3,400,000 barrels.

All products except draft products are pasteurized, which destroys organisms that could affect beer quality. The pasteurizers gradually heat up the product in its containers, maintain the appropriate temperature for a specified time, and gradually cool the product down. Small amounts of ethanol may be emitted from the pasteurizers due to container breakage. Because draft products are not intended to have the shelf life of bottles and cans, and are expected to be consumed shortly after production, they are filtered to remove undesirable organisms.

All beer cartons and boxes are pre-printed at a vendor's facility prior to use at the Merrimack Brewery. The Packaging Lines use adhesives for cartons and cases of beer. Beer bottles either have a pre-printed paper label applied with an adhesive or a pre-printed plastic label applied with an adhesive. Ink is used to apply the date of manufacture on the bottle and can labels or onto the kegs. Beer cartons and boxes of beer have an alcohol-based ink used to apply the date of manufacture to the carton or box.

### III. Regulatory Compliance

#### CHAPTER ENV-A 606 - Air Pollution Dispersion Modelling Impact Analysis Requirements

In the Title V permitting process, DES modeled ABI's criteria emissions to determine its compliance with the AAQS. The modeling predicted violations of the AAQS for sulfur dioxide (SO<sub>2</sub>) when ABI's emissions were modeling interactively with the emissions of other nearby facilities. DES informed ABI of the predicted violation when ABI submitted its application for a permit to install the BERS process. The modeled impacts of SO<sub>2</sub> and the predicted violations of the NAAQS occur even though ABI is in compliance with all the conditions of its permits.

DES and ABI initially agreed upon a compliance plan to raise the height of the stacks from Boilers #1, #2 and #3 to reduce the impacts. ABI reconsidered its plan and instead proposed constructing a biomass plant to generate steam and electricity for the facility while significantly reducing fuel oil combustion and its overall SO<sub>2</sub> emissions. ABI was proceeding with its plan when in early 2007 it was approached by the Belgian brewer InBev regarding its purchase of the Anheuser-Busch company. The purchase was made official in July 2008, pending approval of regulators and shareholders, and the plans for construction of the biomass plant were put on hold.

Prior to April 2007, ABI combusted approximately 400,000 gallons of #6 fuel oil per month in the 3 boilers combined. Since then, in order to reduce its SO<sub>2</sub> emissions, ABI has significantly reduced its use of #6 fuel oil and increased its combustion of lower sulfur-content natural gas and biogas. In April 2007, it combusted approximately 35,000 gallons of #6 fuel oil, approximately equivalent to only 10 percent of its total monthly heat input from oil, natural gas and biogas combined. In August and November 2007, it combusted approximately 5,600 gallons and 2,100 gallons, respectively. In February and March of 2008, it combusted approximately 500 and 40,000 gallons, respectively. In May through July of 2007, September and October of 2007, December 2007 through January 2008, and April through June 2008, ABI combusted no # 6 fuel oil.

In the Title V permit renewal, DES intends to lower the allowable sulfur content of the fuel oil ABI can combust in Boilers #1, #2 and #3 to 0.3 percent.

**CHAPTER ENV-A 600 - Statewide Permit System**

ABI is currently operating under the conditions of Title V Permit TV-OP-044 (the Title V Permit) issued on August 26, 2002 and amended on December 5, 2007 and Temporary Permit TP-BP-0695 (the Temporary Permit) issued on May 9, 2005 and reissued on September 8, 2006. The Title V Permit expired on August 31, 2007. The Temporary Permit expired on November 30, 2007. ABI submitted a renewal application on February 26, 2007 and, therefore, has permit shield until a new Title V permit is issued. The Temporary Permit was issued to allow for the construction and operation of the BERS Process which is a wastewater pretreatment process which uses anaerobic reactors, or digesters, to reduce the biological oxygen demand (BOD) of the wastewater leaving the brewery and sent to the Town of Merrimack's wastewater system. The BERS process produces biogas, primarily methane, to supplement the #6 fuel oil and natural gas being combusted by Boilers #2 and #3, or by the flare if no boiler is available. Off-gases from the digester tank headspace is collected and treated in a packed-bed scrubber to neutralize and oxidize odor-causing constituents of the off-gases, primarily small amounts of hydrogen sulfide.

In addition to allowing for installation of the BERS process, the Temporary Permit includes the additional Reasonably Available Control Technology (RACT) requirements for NO<sub>x</sub> emissions that were originally specified in NO<sub>x</sub> RACT Order ARD-05-001 issued by DES on May 9, 2005. These are described in more detail under Part Env-A 802 – Testing and Monitoring for Stationary Sources.

ABI operates the permitted devices shown in Table I.

**Table I – Significant Activities and Operating Limits**

Device	Size	Permit Conditions	Reported Operations
EU01 – Babcock & Wilcox Boiler #1	138 MMBtu/hr (#6 fuel oil) 142 MMBtu/hr (NG)	Maximum combined annual gross heat input of 2,560,000 MMBtu from #6 fuel oil and natural gas. (Any biogas combusted is not included in this limit).	2005 – 1,528,012 gal #6 fuel oil 2005 – 9.472 MMcf NG 2006 – 672,684 gal #6 fuel oil 2006 – 77.292 MMcf NG 2007 – 83,445 gal #6 fuel oil 2007 – 95.147 MMcf NG
EU02 – Babcock & Wilcox Boiler #2	138 MMBtu/hr (#6 fuel oil) 142 MMBtu/hr (NG)		2005 – 1,586,131 gal #6 fuel oil 2005 – 17.76 MMcf NG 2006 – 792,761 gal #6 fuel oil 2006 – 89.989 MMcf NG 2006 – 12.185 MMcf biogas 2007 – 402,478 gal #6 fuel oil 2007 – 157.087 MMcf NG 2007 – 41.080 MMcf biogas

Device	Size	Permit Conditions	Reported Operations
EU03 – Babcock & Wilcox Boiler #3	138 MMBtu/hr (#6 fuel oil) 142 MMBtu/hr (NG)		2005 – 1,687,100 gal #6 fuel oil 2005 – 12.908 MMcf NG 2006 – 1,236,730 gal #6 fuel oil 2006 – 111.201 MMcf NG 2006 – 10.95 MMcf biogas 2007 – 379,529 gal #6 fuel oil 2007 – 148.665 MMcf NG 2007 – 32.789 MMcf biogas
EU01, EU02 and EU03 combined annual fuel usage (MMBtu/year) <b>NOT</b> including biogas			2005 – 760,845 MMBtu 2006 – 696,892 MMBtu 2007 – 550,494 MMBtu
EU04 – Malt Beverage Production (VOC emissions)	N/A	37.6 lbs VOCs per 1000 barrels of beer per month	2005 – 31.0 lbs VOC/kbbls 2006 – 30.4 lbs VOC/kbbls 2007 – 29.4 lbs VOC/kbbls
EU05 – Grains Handling Systems (includes grain unloading and transfer, dust collection, vacuum, and residuals)		60,000 lbs grain/ hour (525,600,000 lb/yr)	2005 – 119,081,258 lbs grain/year 2006 – 117,649,324 lbs grain/year 2007 – 112,351,969 lbs grain/year
EU06 – Emergency Generator	125,000 gal #6 fuel oil	500 hours per month; 25 tons NOx per consecutive 12-month period	2005 – 8.9 hours 2006 – 11.5 hours 2007 – 22.7 hours
EU07 – Diatomaceous Earth (DE) Process (includes body feed tank and silo)	N/A	Must operate with filter receiver at all times to control particulate	Operated within Permit conditions
EU08 – Alternative Chilling Process (ACP) System	N/A		Operated within Permit conditions

Device	Size	Permit Conditions	Reported Operations
Annual Beer Production (barrels)	Maximum potential production is 4,500,000 barrels packaged /yr		2005 - 2,961,064 2006 - 2,999,969 2007 - 2,964,065

Although allowed by the Temporary Permit, ABI does not burn any self-generated specification used oil. ABI ships its spent grain out as animal feed and the grain remains wet throughout the handling process. ABI recovers 190-proof alcohol from the waste beer through distillation and transports it by truck for off-site use. Although not observed during this off-site evaluation, ABI has not had any problems with fugitive dust during previous on-site evaluations and DES stack test observations.

ABI operates one emergency generator which it tests regularly for periods of 15 minutes to an hour.

ABI's 2005 through 2007 reported annual emissions (in tons) are detailed in Table II.

**Table II – Annual Emissions (tons per year)**

	TSP	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	RTAPs
2005	31.34	376.91	140.65	8.74	47.25	6.31
2006	18.54	213.49	101.55	5.7	47.49	6.62
2007	7.20	72.43	16.51	2.01	45.56	10.61

**Part Env-A 618 – Additional Requirements in Non-Attainment Areas and the New Hampshire Portion of the Northeast Ozone Transport Region**

ABI is located in the Northeast Ozone Transport Region, in Hillsborough County, which is part of the 4-County Ozone Classified Non-attainment region of the state. Modeled emissions from the BERS project do not exceed the non-attainment significance level and, therefore, ABI is not subject to this part.

**CHAPTER ENV-A 700 – Permit Fee System**

**Part Env-A 705 – Emission-Based Fees**

ABI has paid its emissions-based fees through the 2007 calendar year. See the attached *Full Compliance Evaluation Records Review* for details on emissions-based fee payments.

## **CHAPTER ENV-A 800 - Testing and Monitoring Procedures**

### **Part Env-A 802 – Testing and Monitoring for Stationary Sources**

The Title V Permit requires ABI to calibrate its fuel metering devices at least once annually, to visually inspect and replace fabric filters on all of its dust collection and filtration systems as needed, and to perform annual visual inspections of each stack, process unit, and fuel burning device. ABI certifies compliance with these permit requirements in the annual compliance certification and it includes the computerized work orders for these activities in its semi-annual permit deviation and monitoring (SA PD/M) report.

ABI is required to perform stack emissions testing of Boilers #1, #2 and #3 to demonstrate compliance with the emission standards specified in the Reasonably Available Control Technology (RACT) requirements for NO<sub>x</sub> in Env-A 1211. The Title V Permit requires Boilers #1, #2 and #3 to comply with the RACT standard of 0.4 lb/MMBtu when combusting #6 fuel oil. The Temporary Permit included additional testing requirements and a lower emission standard of 0.25 lb/MMBtu for Boilers #1, #2 and #3 when combusting natural gas or a combination of natural gas and biogas, and set a limit of 0.68 lb/MMBtu from the biogas flare. The Temporary Permit allows the co-firing of #6 fuel oil with on-site-generated specification used oil and/or biogas, subject to the NO<sub>x</sub> RACT limit of 0.4 lb/MMBtu. Finally, in addition to requiring ABI to test all 3 boilers when burning #6 fuel oil and #6 fuel oil with biogas on a 3-year frequency, the Temporary Permit requires one of the 3 boilers to be tested every 3 years when firing natural gas and natural gas with biogas, such that every 3 years a different boiler will be tested.

ABI last performed emissions testing on the 3 boilers and the BERS process in October 16 through 19, 2006. All devices complied with the applicable emission standards in the Title V and Temporary Permits.

## **CHAPTER ENV-A 900 - Owner or Operator Recordkeeping and Reporting Obligations**

ABI maintains all of the records required by the Title V and Temporary Permits.

ABI has submitted all reports required by the permits. See the attached *Full Compliance Evaluation Records Review* for a full list of reports submitted by ABI and reviewed by DES ARD.

## **CHAPTER ENV-A 1200 – Prevention, Abatement, and Control of Stationary Source Air Pollution**

### **Part Env-A 1204 - Stationary Sources of Volatile Organic Compounds (VOCs)**

DES issued VOC RACT Order ARD-00-001 to ABI on April 15, 2002. Those requirements are included in the Title V Permit. ABI is subject to the VOC RACT requirements of Env-A 1204.48 (formerly Env-A 1204.27) Applicability Criteria for Miscellaneous and Multicategory Stationary VOC Sources. ABI is required to follow production loss reduction activities as specified in the Title V Permit to minimize the loss of product and reduce emissions of VOCs. These activities include an

information management system for maintenance and to track production data and process losses, a formal training plan for its employees, and a training manual for each piece of equipment it operates. ABI is required to limit its VOC emissions to less than 37.6 pounds per thousand bottles of beer packaged per calendar month.

### Part Env-A 1211 - Nitrogen Oxides (NO<sub>x</sub>)

As noted previously under Testing and Monitoring, ABI is subject to NO<sub>x</sub> RACT and is required to perform compliance stack testing for NO<sub>x</sub> every three years.

The results of the NO<sub>x</sub> RACT testing from October 2006 are shown in Table III.

**Table III – Stack Test Results**

<b>Boiler Number</b>	<b>Operating Condition</b>	<b>NO<sub>x</sub> Emissions (lb/MMBtu)</b>	<b>NO<sub>x</sub> RACT Limit (lb/MMBtu)</b>
Boiler #1	Firing #6 fuel oil only	0.3887	0.40
Boiler #2	Firing #6 fuel oil only	0.3847	0.40
Boiler #2	Firing #6 fuel oil and biogas	0.3897	0.40
Boiler #3	Firing #6 fuel oil only	0.3837	0.40
Boiler #3	Firing #6 fuel oil and biogas	0.3720	0.40
Boiler #3	Firing natural gas only	0.1523	0.25
Boiler #3	Firing natural gas and biogas	0.1430	0.25

All boilers under all firing conditions complied with the limits for NO<sub>x</sub> RACT.

### CHAPTER ENV-A 1400 - Regulated Toxic Air Pollutants (RTAPs)

ABI calculates and submits to DES its annual RTAP emissions in the annual emissions report. ABI certifies its compliance with Env-A 1400 in the annual compliance certification.

### CHAPTER ENV-A 1600 - Fuel Specifications

ABI burns #6 fuel oil, natural gas, biogas and diesel fuel. ABI reports its fuel usage for each fuel-burning device in its annual emission report. It reports monthly usage of each fuel, the heating value and the sulfur content. ABI has requested and Keyspan has provided documentation that states all natural gas received at the facility contains less than 5 grains of sulfur per 100 cubic feet of natural gas.

### CHAPTER ENV-A 2000 - Fuel Burning Devices

#### Part Env-A 2002 – Operational Requirements

The Title V Permit limits the opacity from ABI's fuel burning devices to 20 percent. Compliance with this requirement could not be verified during this off-site evaluation.

#### IV. Compliance with other Miscellaneous Provisions

##### Chapter Env-A 400 – Acid Deposition Control Program

This chapter applies to those sources that emitted 100 tons or more of SO<sub>2</sub> per year on average during the period of 1979 through 1982. Anheuser-Busch is one of these sources. In accordance with Env-A 403.01, the average emission rate of any source subject to this rule shall not exceed 1.6 lb/MMBtu of SO<sub>2</sub>, which is equivalent to combusting #6 fuel oil with 1.5% sulfur by weight and 75% of the baseline average emission rate for these sources. The average emission rate is calculated by using the annual fuel usage data, and applying the AP-42 factors for SO<sub>2</sub> emissions and reported fuel sulfur content for each fuel to calculate the pounds of SO<sub>2</sub> emitted per year. In ABI's case, it has been steadily increasing its use of natural gas and biogas, which are much lower in sulfur content, and reducing its combustion of higher sulfur-content #6 fuel oil. The average emissions per heat input is calculated by dividing the total annual SO<sub>2</sub> emissions by the annual heat input rate.

Results of ABI's average emission rate calculations are shown in Table IV.

**Table IV – Average SO<sub>2</sub> Emissions**

<b>Year</b>	<b>Average SO<sub>2</sub> Emissions (lb SO<sub>2</sub>/MMBtu heat input)</b>
Regulatory Limit	1.6
2005	0.99
2006	0.60
2007	0.24

##### CHAPTER ENV-A 500 - Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants

ABI is not subject to any of the New Source Performance Standards (NSPS) specified in Env-A 503.01 or other 40 CFR 60; any of the National Emission Standards for Hazardous Air Pollutants (NESHAP) specified in Env-A 504.01 or other 40 CFR 61; or any of the National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technology, or MACT, Standards) specified in Env-A 505.01 or other 40 CFR 63.

##### CHAPTER ENV-A 2100 - Particulate Matter and Visible Emissions Standards

###### Parts Env-A 2102.03 & Env-A 2102.04 – Particulate Matter Emission Standards

The Title V Permit does cite the requirements for calculation of particulate emission standards specified in Env-A 2102.03. However, no emission standards have been calculated and no particulate matter testing has been done at ABI.

**Part Env-A 2103.02 – Visible Emission Standards**

ABI is required to comply with the 20% opacity standard for visible emissions. However, compliance with this requirement could not be confirmed during this off-site evaluation. There have been no complaints to DES of excessive visible emissions originating from ABI.

**V. Compliance with Applicable Federal Rules:**

**40 CFR 70.6 (a)(3) Permit Content, Monitoring, Record Keeping, and Reporting Requirements**  
See the *Full Compliance Evaluation Records Review* which is included as an attachment to this report for greater detail of ABI's Title V reporting history and compliance status. ABI has submitted all its Title V reports on time. All reports are thorough and accurate.

**VI. Pollution Control Equipment**

ABI operates the pollution control equipment associated with the grains handling and brewing processes listed in Table V.

**Table V – Pollution Control Equipment**

<b>Pollution Control Equipment</b>	<b>Description of Equipment</b>	<b>Pollutant Controlled</b>	<b>Emission Unit</b>
PCE01	Alternative Low NO <sub>x</sub> Burners	NO <sub>x</sub>	EU01
PCE02	Alternative Low NO <sub>x</sub> Burners	NO <sub>x</sub>	EU02
PCE03	Alternative Low NO <sub>x</sub> Burners	NO <sub>x</sub>	EU03
PCE04	Dust Collection Systems Filter Receivers	PM	EU05
PCE05	Grains Unloading System Filter Receiver	PM	EU05
PCE06	Grains Transfer System Filter Receiver	PM	EU05
PCE07	Vacuum Cleaning System Filter Receiver and Cyclones	PM	EU05
PCE08	Residuals Building Dust Filter Receiver	PM	EU05
PCE09	DE Body Feed Tank Filter Receiver	PM	EU07
PCE10	DE Silo Filter Receiver	PM	EU07
PCE11	ACP Filter Receiver	PM	EU08

ABI operates the pollution control equipment associated with the BERS Process shown in Table VI.

**Table VI – Pollution Control Equipment for BERS Process**

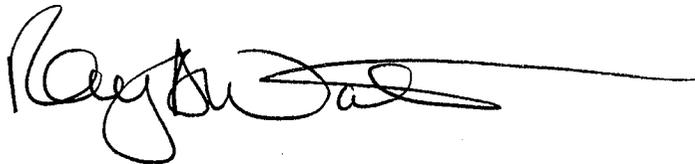
<b>Pollution Control Device</b>	<b>Description of Equipment</b>	<b>Pollutant Controlled</b>	<b>Emission Unit</b>
Open Flare	Backup control device for biogas from BERS	RTAPs in biogas	BERS Process
Packed Bed Scrubber	Off-gases from headspace in BERS process digesters	H <sub>2</sub> S	BERS Process

**VII. Compliance and Enforcement Status**

DES ARD has no open enforcement actions against ABI. DES ARD has not taken any enforcement action against ABI in the time period covered by this compliance evaluation.

**VIII. Conclusion and Recommended Actions**

DES ARD did not note any deficiencies during this off-site evaluation.



Raymond Walters  
Compliance Measurement and Data Programs Manager  
Air Resources Division

**Attachments**

Full Compliance Evaluation Records Review (2 pages)

## Full Compliance Evaluation Records Review

**Facility:** Anheuser-Busch, Inc.  
**Date of FCE:** September 30, 2008  
**Reviewer:** Ray Walters

**Annual Emission Reports (incl. NOx, VOC etc.):**

Reporting Period	When Rec'd	Report OK	In Database
2005	04/13/06	Yes	Yes
2006	04/13/06	Yes	Yes
2007	04/14/08	Yes	Yes

**Annual Emissions-Based Fee Payments:**

Reporting Period	When Rec'd	In Database
2005	04/13/06	Yes, in DES Emission Section's Spreadsheet
2006	04/16/07	Yes, in DES Emission Section's Spreadsheet
2007	04/14/08	Yes, in DES Emission Section's Spreadsheet

**TV Annual Compliance Certifications:**

Reporting Period	When Rec'd	Report OK	In Database
2005	04/14/06	Yes	Yes
2006	04/13/07	Yes	Yes
2007	04/14/08	Yes	Yes

**TV Semi-Annual Permit Deviation and Monitoring Reports:**

Reporting Period	When Rec'd *	Report OK	In Database
Jan - June 2005	10/17/05	Yes	Yes
July - Dec, 2005	04/14/06	Yes	Yes
Jan - Jun 2006	10/12/06	Yes	Yes
Jul - Dec 2006	04/13/07	Yes	Yes
Jan - Jun 2007	10/12/07	Yes	Yes
Jul - Dec 2007	04/14/08	Yes	Yes

\* Anheuser-Busch submits its SA PD/M reports, with the concurrence of DES, on the alternate schedule of no later than April 15 and October 15

Individual Permit Deviations Reports:

Reporting Period	When Rec'd	Report OK	In Database
ABI has submitted no PD reports during the period being reviewed for this off-site evaluation.			

Quarterly Fuel Usage Reports:

Reporting Period	When Rec'd *	Report OK	In Database
1 <sup>st</sup> Qtr. 2005	05/10/05	Yes	Yes
2 <sup>nd</sup> Qtr. 2005	08/15/05	Yes	Yes
3 <sup>rd</sup> Qtr. 2005	11/15/05	Yes	Yes
	11/23/05 revised		Yes
4 <sup>th</sup> Qtr. 2005	02/01/06	Yes	Yes
1 <sup>st</sup> Qtr. 2006	05/12/06	Yes	Yes
2 <sup>nd</sup> Qtr. 2006	08/14/06	Yes	Yes
3 <sup>rd</sup> Qtr. 2006	11/15/06	Yes	Yes
4 <sup>th</sup> Qtr. 2006	02/15/07	Yes	Yes
1 <sup>st</sup> Qtr. 2007	05/14/07	Yes	Yes
2 <sup>nd</sup> Qtr. 2007	08/14/07	Yes	Yes
3 <sup>rd</sup> Qtr. 2007	11/13/07	Yes	Yes
4 <sup>th</sup> Qtr. 2007	02/13/08	Yes	Yes
1 <sup>st</sup> Qtr. 2008	05/15/08	Yes	Yes
2 <sup>nd</sup> Qtr. 2008	08/14/08	Yes	Yes

\* Required to be submitted to DES-ARD within 45 days after the end of the quarter being reported.

Stack Tests:

Stack Test Date	Device Tested	When Rec'd	Report OK	In Database
10/17-19/08	Boilers #1 (oil only), #2 (oil only; oil & biogas) and #3 (oil only; oil & biogas; NG only; NG & biogas)	12/21/06	Yes	Yes
10/19/06	BERS Process	12/22/06	Yes	Yes