Georgia-Pacific Wood Products, LLC
Georgia-Pacific Hawthorne Plywood Plant
Facility AIRS ID: 1070015

Appendix CAM

Compliance Assurance Monitoring (CAM) Requirements

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., F.A.C., the CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, is/are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]

2. The attached CAM plan(s) include the following information:
(i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
(ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
(iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.
[40 CFR 64.6(c)(1)]

3. The attached CAM plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.)** and reporting exceedances or excursions (see **CAM Conditions 10. – 14.**).
[40 CFR 64.6(c)(2)]

4. The permittee is required to conduct the monitoring specified in the attached CAM plan(s) and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 17.**).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit.
[40 CFR 64.7(a)]

6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]

7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all

times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.a.,** above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
[40 CFR 64.8(a)]

11. Elements of a QIP:
a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
(i) Improved preventive maintenance practices.
(ii) Process operation changes.
(iii) Appropriate improvements to control methods.
(iv) Other steps appropriate to correct control performance.
(v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).
[40 CFR 64.8(b)]

12. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
[40 CFR 64.8(c)]

13. Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:
a. Failed to address the cause of the control device performance problems; or
b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
[40 CFR 64.8(d)]

14. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
[40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General reporting requirements.

a. On and after the date specified in **CAM Condition 5.** by which the owner or operator must use monitoring that meets the requirements of this appendix, the owner or operator shall submit monitoring reports semi-annually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.

b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C., and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10.** through **14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR 64.9(a)]

16. General recordkeeping requirements.

a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62- 213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10.** through **14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:

a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority

under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

Georgia-Pacific Hawthorne Plywood Plant

Emissions Unit 001 (EU001) - Wood-fired Boiler

PM Emissions Controlled by Electro-static Precipitator (ESP)

Monitoring Approach

Emissions Unit 001 - ESP	
	Indicator
I. Indicator Measurement Approach	Power (in Watts) The secondary voltage and secondary milliamps for each TR set will be read from the meters in place on the ESP. Parameters to Monitor: Performance of the ESP will be measured by the secondary kilovolts and secondary milliamps for each cell of the ESP. The readings from each TR set will be recorded once each day to determine the power to each cell of the ESP. Pt = V1I1 + V2I2 + V3I3 Pt = Total ESP power (watts) V1 = Secondary voltage (kV), ESP field 1 I1 = Secondary current (ma), ESP field 1 V2 = Secondary voltage (kV), ESP field 2 I2 = Secondary current (ma), ESP field 2 V3 = Secondary voltage (kV), ESP field 3 I3 = Secondary current (ma), ESP field 3
II. Indicator Range	An excursion is defined as follows. 1. When three (3) TR sets are operating—any daily determination of the ESP power level less than 50,000 Watts (50 kW). 2. When any two (2) TR sets are operating—any daily determination of the ESP power level less than 30,000 Watts (30 kW). An excursion will trigger an investigation of the occurrence, corrective actions, and a reporting/documentation requirement.
III. Performance Criteria **A. Data Representativeness**	ESP secondary voltage and secondary current **for the fields that are operational,** 1, 2 and 3, are recorded at least once per day.
B. Verification of Operational Status	Not Applicable.
C. QA/QC Practices and Criteria	The voltmeter and ammeter will be calibrated and maintained as required by the manufacturer, but no less than annually.
D. Monitoring Frequency	The power will be calculated from secondary kilovolt and milliamp readings to be taken at least once per day. The reading will consist of averaging 4 readings approximately 15 minutes apart, over a one hour period.
E. Data Collection	The secondary kilovolt and milliamp readings will be taken manually from the voltmeter and ammeter. The values for each cell will be multiplied and then added together to determine the status.
F. Average Period	Four readings, approximately 15 minutes apart, over a one-hour period.

Georgia-Pacific Hawthorne Plywood Plant

Emissions Unit 005 - Veneer Dryers 1, 2 and 3
VOC Emissions Controlled By a Regenerative Thermal Oxidizer (RTO)

Monitoring Approach

Emissions Unit 005 - RTO	
	Indicator
I. Indicator **Measurement Approach**	Temperature of the RTO combustion chamber. Measure the RTO chamber temperature using at least three thermocouples located in the combustion chamber.
II. Indicator Range	An excursion is defined as: Any 3-hour block average firebox temperature at or below the minimum temperature established in accordance with the requirements of 40 CFR 63.2262 (k). An excursion will trigger an investigation of the occurrence, corrective actions, and a reporting/documentation requirement.
III. Performance Criteria **A. Data Representativeness**	The data for determining the operating range will be developed base on the performance test (s) and the procedures described in 40 CFR 63.2260 through 22269, at which the RTO could operate at and maintain compliance.
B. Verification of Operational Status	1. Operational status as the RTO and the monitoring equipments (i.e. including thermocouple) are checked periodically throughout each shift by the dryer operator. Daily parametric monitoring reports that summarize the operating conditions of the RTO, including temperature, are reviewed twice each week. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO.
C. QA/QC Practices and Criteria	1. Semi-weekly report review. 2. Calibrate the temperature sensors annually. *Note(1)* 3. Maintenance schedule of daily, weekly, monthly, quarterly and annual activities. 4. Audible and visual alarms are checked annually during annual maintenance activities. *Note (1):* Plywood MACT requires each temperature monitoring device calibrated at least semiannually. It is more stringent than CAM QA/QC requirements. Georgia-Pacific interprets that installing a new temperature sensor rather than calibrating the existing unit eliminates the need for redundant temperature monitoring as stated in 63.2269(b)(4). This interpretation is taken from 63.2269(b)(5) which, when the maximum temperature is exceeded, requires calibration or validation or installation of a new sensor.
D. Monitoring Frequency	Temperature is measured continuously (*i.e.*, every 10 seconds), averaged and recorded every 15 minutes, and block averaged each 3- hour period.
E. Data Collection	The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators discussed previously. Recordkeeping and reporting of the parameters are managed using a dedicated computer equipped with a relational database (such as Wonderware's Industrial SQL

	Server Software). Additionally, the unit is equipped with a chart recorder that continuously records the firebox temperature as the back-up of the computer monitoring database.
F. Average Period	Temperature readings are documented every 15 minutes, from data collected every 10 seconds. The data are then averaged over a 3-hour period. The 3 hour average is the value used to verify compliance with the minimum firebox temperature.