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 plan that is included in this appendix contains 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, as submitted by the applicant, is approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]

2. The attached CAM plan 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 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 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)]

<u>40 CFR 64.9 Reporting And Recordkeeping Requirements</u>.

15. <u>General reporting requirements</u>.
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. <u>General recordkeeping requirements</u>.
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)]

<u>40 CFR 64.10 Savings Provisions</u>.

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]

Mosaic Fertilizer, LLC – Riverview Facility

Emissions Unit 007

No.6 Granulation Plant Cooler
PM Emissions Controlled By Cooler Venturi Scrubber

CAM Plan

CAM Plan

Mosaic Fertilizer, LLC Permit No. 0570008-066-AV
Riverview Facility

A summary of the applicability of Compliance Assurance Monitoring (CAM) to each emissions unit at the Mosaic's Riverview facility is presented in Table CAM-1. As shown in the table, CAM regulations are applicable only to the venturi scrubber used to control particulate matter (PM) and fluoride (F) emissions from the cooler associated with the No. 6 Ammoniated Phosphate Plant (Emission Unit ID No. 7). Fluoride emissions from this cooler are regulated under Title 40, Part 63 Subpart BB, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Phosphate Fertilizer Production Plants and, are therefore, not subject to CAM regulations. Although EPA mentions PM in Subpart BB, they do not establish emission standards or limitations for PM, and as such, PM emission from the cooler are subject to CAM because this scrubber cannot be considered "inherent process equipment" (e.g., used to recover product or protect worker safety), and it is used to meet the PM emission limit of 0.15 pounds per ton of product for the entire emissions unit.

CAM Applicability & Monitoring Approach Notes

Certain pieces of equipment were considered to be 'inherent' to the fertilizer manufacturing process for CAM purposes, making this equipment exempt from CAM. The applicant listed the equipment that specifically met the inherent process criteria. To be considered equipment inherent to the process instead of an air pollution control device all three questions required a "yes" answer:

1. Is the primary purpose of the equipment other than to control emissions relative to the applicable emissions limit (e.g., product recovery, worker safety)?
2. Would the equipment be installed if there were no applicable emissions limit in place for the pollutant specific emission unit?
3. Is the efficiency at which the equipment is operated by design for purposes other than compliance with the applicable emissions limit more than sufficient to assure compliance with the applicable emissions limit (e.g., a significant margin of compliance)?

A more detailed analysis on the applicability of CAM to pieces of equipment at the facility was provided by the applicant, referenced in Table CAM-1, Summary of CAM Applicability Determinations.

For ease of reference the following definitions are cited from 40 CFR 64.1 Definitions (10/03/1997):

> *Exceedance shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.*
>
> *Excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.*

I. Background.

A. Emissions Unit.

Description: No. 6 Ammoniated Phosphate Plant
Emissions Unit ID No.: -007

B. Applicable Regulations, Emission Limits and Monitoring Requirements.

Applicable Regulations: [See below conditions referenced from permit which contain regulatory citations.]

Emission Limits:

PM (Particulate Matter):	0.15 lb/ton of product, 12.88 lb/hr, 56.39 TPY [See Condition No. B.4.]
F (Fluoride):	0.035 lb/ton of 100% P_2O_5, 3.00 lb/hr, 13.16 TPY [See Condition B.6.]
Opacity (VE)	20% [See Condition No. B.5.]

CAM applies to PM only.

Monitoring Requirements: Monitor the mass flow of P_2O_5, scrubber liquid flow rate, scrubber gas pressure drop, and fan motor amperage.
[See Conditions M.4., M.5., M.6. & M.7.]

Annual PM, F, and VE tests.
[See Condition B.10.]

C. Control Technology.

This emissions unit consists of the following process components: reactors, granulator, dryer, and cooler. Emissions from the reactors and granulators are controlled by the reactor/granulator/equipment vents (RGV) venturi scrubber followed in series by the RGV tower tailgas scrubber and an ammonia vaporizer. Emissions from the dryer are controlled by the dryer venturi scrubber followed by the dryer packed-tower tailgas scrubber. The dryer tailgas scrubber and ammonia vaporizer emissions discharge through a common stack. Emissions from the cooler and miscellaneous points are controlled by the cooler venturi scrubber followed by a cooler tailgas scrubber. The cooler tailgas scrubber discharges through a separate stack. As detailed in Table CAM-1, only PM emissions from the cooler venturi scrubber are subject to CAM regulations.

II. Monitoring Approach

E.U. ID No. 007	Indicator No. 1	Indicator No. 2	Indicator No. 3
A. Indicator	Pressure Drop across the Scrubber	Scrubber Liquid Flow Rate to Scrubber	Fan Amperage
Measurement Approach	Differential Pressure Meter	Flow Meter	Amp Meter
B. Indicator Range Equipment	Pressure Drop: Minimum in in inches of H_2O Cooler Venturi Scrubber The indicator range is established based on compliance test data as described in Table CAM-2. An "excursion" is defined as operation outside of the indicator range. Excursions trigger an inspection, corrective action, and a reporting requirement.	Scrubbing Liquid Flow Rate: Minimum and Maximum in gallons per minute (gpm) Cooler Venturi Scrubber The indicator range is established based on compliance test data as described in Table CAM-2. An "excursion" is defined as operation outside of the indicator range. Excursions trigger an inspection, corrective action, and a reporting requirement.	Fan Amperage: Minimum and Maximum in amps. Cooler Venturi Scrubber The indicator range is established based on compliance test data as described in Table CAM-2. An "excursion" is defined as operation outside of the indicator range. Excursions trigger an inspection, corrective action, and a reporting requirement.
C. Performance Criteria 1. Data Representativeness	The minimum accuracy of the device is ± 5 percent.	The minimum accuracy of the device is ± 5 percent.	The minimum accuracy of the device is ± 5 percent.
2. Verification of Operation Status	Operator Check	Operator Check	Operator Check
3. QA/QC Practices and Criteria	The differential pressure meter is calibrated at least annually	The flow meter is calibrated at least annually	The amp meter is calibrated at least annually
4.a. Monitoring Frequency	The pressure drop is monitored continuously.	The scrubber liquid flow is monitored continuously.	The fan amperage is monitored continuously.
4.b. Data Collection Procedures	The scrubber pressure drop is electronically recorded at least every 15-minutes. Averages are computed using 15-minute block averages of the pressure indicator readings.	The scrubber liquid flow rate is electronically recorded at least every 15-minutes. Averages are computed using 15-minute block averages of the flow indicator readings.	Averages are computed using 15-minute block averages of the flow indicator readings.
4.c. Averaging Period	24-hour (daily) block average of the 15-	24-hour (daily) block average of the 15-	24-hour (daily) block average of the 15-

	minute readings.	minute readings.	minute readings.

III. Establishment & Reestablishment of Indicator Range.

1. The permittee shall use either MACT option (1) as specified in A. or MACT option (2) as specified in B.

A. MACT option (1) + AMP, DEP Order No. 03-C-AP (Attachment B)

Indicator Range Defined

1. Each indicator range is established in accordance with this procedure under this CAM Plan. The permittee shall follow the specific procedures referred to as MACT option (1) (see 40 CFR 63.625(f)(1) as it applies to an ammoniated phosphates plant). The indicator (allowable) range under this approved CAM Plan is established based on the most recently completed compliance test results for the individual emission unit provided by the applicant (see Table CAM-2).

a. The indicator range consists of a minimum and maximum value. The minimum value is 20% less than the test average value. The maximum value is 20% more than the test average value. Table CAM-2, a spreadsheet, shows how the range is calculated from the individual emission unit compliance test results submitted by the applicant. The test average value shall be the average of three valid individual compliance test runs, not the value from an individual test run. In no case shall failed tests be used in establishing ranges.

   Table CAM-2 shows how the current indicator range values are derived from the individual emission unit compliance test results data set submitted by the applicant.

   Table CAM-2 summarizes the initial allowable (indicator) range values, e.g., the minimum and maximum values.

[40 CFR 64.6(c)(2); Rule 62-213.440(1)(b)1.a., F.A.C.]

Reestablishment of Indicator Range.

2. Each indicator range is reestablished in accordance with this procedure under this CAM Plan. The permittee shall follow the specific procedures referred to as MACT option (1) (see 40 CFR 63.625(f)(1) as it applies to an ammoniated phosphates plant) to reestablish each indicator range.

The indicator range shall be reestablished in accordance with the following additional conditions:

a. Upon successful completion of each required annual compliance test, the indicator values during testing shall be used to reestablish the indicator range;

b. Updated individual spreadsheets, as shown in Table CAM-2, shall be submitted with each compliance test results. The reestablished minimum and maximum values of the indicator range shall be clearly shown in the individual spreadsheets submitted; and,

c. Upon establishment of a new indicator range the permittee shall operate under the new indicator range.

[40 CFR 64.6(c)(2); Rule 62-213.440(1)(b)1.a., F.A.C. and Rule 62-297.310(7)(b), F.A.C.]

Additional Requirements.

3. The following additional requirements apply under this CAM Plan:

   a. No changes shall be made to the indicators, indicator range setting methodology or the averaging periods specified;

   b. All tests must comply with the notification, testing and reporting requirements in Rule 62-297, F.A.C.;

   c. If the compliance authority has reason to believe a test was not done in accordance with regulatory requirements applicable to a test then the compliance authority shall require a special compliance test pursuant to Rule 62-297.310(7)(b), F.A.C.

   d. The maximum pressure drop (dP) may be satisfied by establishing minimum and maximum fan amps in accordance with the AMP, DEP Order No. 03-C-AP dated January 5, 2004. If owner/operator elects to use fan amps in lieu of the maximum dP, then the owner/operator shall submit to the Department updated individual emission unit test result spreadsheets shown as attached Table CAM-2 and request a revision to this CAM Plan. The updated spreadsheets (Table CAM-2) shall include the scrubber parameters, e.g., dP, Q and fan amps.

[40 CFR 64.6(c)(2); Rule 62-213.440(1)(b)1.a., F.A.C.; Rule 62-297.310(7)(b), F.A.C.; and AMP, DEP Order No. 03-C-AP, dated January 5, 2004.]

B. MACT option (2) + AMP, DEP Order No. 03-C-AP

Indicator Range Defined.

1. Each indicator range is defined in accordance with this procedure under this CAM Plan which is intended to require that the permittee follow the specific procedures referred to as MACT option (2) (see 40 CFR 63.625(f)(2) as it applies to an ammoniated phosphates plant). The initial indicator (allowable) range under this approved CAM Plan is established based on the completed compliance test results for the individual emission unit provided by the applicant (see Table CAM-2).

a. The indicator range consists of a minimum and maximum value. The minimum value is the lowest test average value from the historical data set. The maximum value is the highest test average value from the historical data set. The test average value shall be the average of three valid individual compliance test runs, not the value from an individual test run. In no case shall failed tests be used in establishing ranges.

   Table CAM-2 shows how the current indicator range values are derived from the individual emission unit historical compliance test results data set submitted by the applicant.

   Table CAM-2 summarizes the initial allowable (indicator) range values, e.g., the minimum and maximum values.

b. The initial "allowable range" as established under the MACTs used for this CAM Plan must be submitted to the Department for review and approval.

[40 CFR 64.6(c)(2); Rule 62-213.440(1)(b)1.a., F.A.C.]

Reestablishment of Indicator Range.

2. Each indicator range shall be reestablished in accordance with this procedure under this CAM Plan which is intended to require that the permittee follow the specific procedures referred to as MACT option (2) (see 40 CFR 63.625(f)(2) as it applies to an ammoniated phosphates plant) to reestablish each indicator range.

The indicator range shall be reestablished in accordance with the following additional conditions:

a. Upon successful completion of each required annual compliance test, the indicator values during testing shall be used to reestablish the indicator range;

b. The indicator values during testing shall be added into the individual emission unit compliance test results historical data set (shown in Table CAM-2) and a new indicator range as defined in 1.a. above shall be reestablished;

c. Updated individual spreadsheets, as shown in Table CAM-2., shall be submitted with each compliance test results. The permittee shall indicate whether or not the indicator range has changed as a result of the annual compliance testing. The reestablished minimum and maximum values of the indicator range shall be clearly shown in the individual spreadsheets submitted; and,

d. Upon establishment of a new indicator range the permittee shall operate under the new indicator range.

[40 CFR 64.6(c)(2); Rule 62-213.440(1)(b)1.a., F.A.C.]

Additional Requirements.

3. The following additional requirements apply under this CAM Plan:

   a. No changes shall be made to the indicators, indicator range setting methodology or the averaging periods specified;

   b. No changes shall be made to the historical test result data set. The Department will reevaluate the historical test result data set used to establish the indicator ranges under this CAM Plan during renewal of this permit;

   c. All tests must comply with the notification, testing and reporting requirements in Rule 62-297, F.A.C.;

   d. If the compliance authority has reason to believe a test was not done in accordance with regulatory requirements applicable to a test then the compliance authority shall require a special compliance test pursuant to Rule 62-297.310(7)(b), F.A.C.

   e. The owner/operator shall certify in the test results from MACT used for CAM - "*that the control devices and processes have not been modified subsequent to the testing upon which the data used to establish the allowable ranges were obtained.*"; and,

   f. The maximum pressure drop (dP) may be satisfied by establishing minimum and maximum fan amps in accordance with the AMP, DEP Order No. 03-C-AP dated January 5, 2004. If owner/operator elects to use fan amps in lieu of the maximum dP, then the owner/operator shall submit to the Department updated individual emission unit test result spreadsheets shown as attached Table CAM-2 and request a revision to this CAM Plan. The updated spreadsheets (Table CAM-2) shall include the scrubber parameters, e.g., dP, Q and fan amps.

[40 CFR 64.6(c)(2); Rule 62-213.440(1)(b)1.a., F.A.C.; Rule 62-297.310(7)(b), F.A.C.; and AMP, DEP Order No. 03-C-AP, dated January 5, 2004.]

IV. Justification.

E.U. ID No. -007

A. Rationale for Selection of Performance Indicators.

Based on EPA regulations and industry practice, the performance indicators selected were the scrubber liquid flow rate and pressure drop. These parameters have been widely accepted by the Department to provide reasonable assurance of proper scrubber operation and the resulting emission control.

The owner/operator requested and received an alternate monitoring plan (DEP Order No. 03-C-AP, dated January 5, 2004). This Order authorized the requested establishment of fan amps in lieu of a maximum dP for MACT emission units.

B. Rationale for Defining Performance Indicator Ranges.

Under CAM, an “indicator range” is similar to a MACT “allowable range” for an air pollution control device’s operating parameter. Under MACT, the “allowable range” is established based on compliance tests.

The indicator range in this CAM Plan is based on the MACT. Each indicator (allowable) range is established based on completed compliance test results as described in Condition II.

The MACTs contain two methodologies to establish “allowable ranges.” The MACT "allowable range" must be established using the methodology of either 40 CFR 63.625(f)(1) or (2) as it applies to an AP plant. The first methodology in paragraph (1) referred to as MACT option (1) uses the most recent compliance test establishing an “allowable range” equal to ±20% of the “baseline average.”

The second methodology in paragraph (2) referred to as MACT option (2), requires the "allowable range" to be submitted to the Department for review and approval. Under (2) an "allowable range" may be based upon "baseline average values" recorded during previous performance tests. Under (2), as an alternative, the owner/operator can establish the "allowable ranges" using the results of performance tests conducted specifically for the purposes of this paragraph. A ±20% adjustment to the "baseline average value" to create an “allowable range” is not specifically cited in the methodology of paragraph (2). As part of the methodology of paragraph (2) the owner/operator is required to certify - "*that the control devices and processes have not been modified subsequent to the testing upon which the data used to establish the allowable ranges were obtained*." The applicant requested that this CAM Plan be patterned after the MACT using the methodology of paragraphs (1) & (2).

DEP Order No. 03-C-AP condition number 1. specifically does not require a maximum dP to be established. Instead condition number 3. requires minimum and maximum fan amps to be established. For the emission unit regulated under the MACT, fan amps may be utilized as stated in 3.f.

C. Rationale for Reestablishment of Indicator Ranges.

The federal regulation for CAM allows the permit to specify the procedures to change ("reestablish") indicator ranges, see 40 CFR 64.6(c)(2). The procedure developed to change an indicator range under this CAM Plan as outlined in Section II. was based on the EPA regulations for phosphate fertilizer plants, contained in 40 CFR 63 Subpart BB. The specific procedures requiring changes to a "baseline average" and the "allowable range" under Subpart BB are found at 40 CFR 63.625(f)(1) & (2).

D. Rationale for Selection of Averaging Periods.

EPA suggests data be averaged "consistent with the characteristics and typical variability of the pollutant-specific emissions unit …" (see 40 CFR 64.3(b)(4)(i)). The averaging period could be based on the size of the PSEU (pollutant specific emissions unit) (see 40 CFR 64.3(b)(4)(ii) & (iii)). Also, at 40 CFR 64.3(c) "the level of actual emissions relative to the compliance limitation" could be considered in the monitoring design, e.g., averaging period. The CAM regulation implies a minimum averaging period of daily (24-hours) at 40 CFR 64.3(b)(4)(iii). This PSEU is classified as a 'major PSEU' for PM and F emissions under 40 CFR 64.3(b)(4)(ii).

The MACT at 40 CFR 63.624 specifies an averaging period of daily (24-hours).

A 24-hour (daily) block average period was selected as appropriate in this CAM Plan.