FACILITY MONITORING

1. This plan is used to monitor facility performance with respect to the emissions of NO_x and CO from source ID numbers 0330089-001and 002. Operating parameters are described below which reflect the amounts of NO_x and CO being processed by the facility. Typical values are given for each parameter. These parameters are used only to indicate when further investigation is warranted. Only the "Measurement and Calculation of Air Emissions" program can determine if the facility is operating within the appropriate limitations.

2. The maximum allowable emission rates for each pollutant is as follows:

Pollutant	Emission Rate
CO	10.64 lbs/hr.
NO_x	0.33 lbs/hr.

NO_x

1. Virtually all of the NO_x entering the facility is removed by scrubbing the process stream with water. The higher nitrogen oxides form nitric acid when coming in contact with the water. This is an exothermic process, therefore the temperature of this process is monitored. The temperature of the gas leaving the scrubbing operation is monitored using a thermocouple (TI-318). Should the facility receive an unusually high concentration of NO_x in the stack gas, the exothermic scrubbing process will generate more heat and the temperature of the gas leaving the scrubbing operation will rise. Other factors affecting the gas temperature include the ambient temperature and the temperature of the scrubbing water.

Operating Parameter	TI-318
Logging	4 hours
Normal Range	85-110 F
Alarm Value	120 F (or higher)

2. Upon receiving an alarm for TI-318 or recording a reading that is at or above the alarm value of 120 F, the plant technician will immediately begin to determine the cause of the alarm. Should the cause of the high temperature not be identified

and/or eliminated within one hour, the facility will stop production until the problem can be resolved.

CO

1. A catalyst is employed to oxide CO to CO_2. The CO_2 concentration in the process gas is measured after the catalyst. The concentration of CO_2 rises as the process gas passes through the catalyst because any CO present is converted to CO_2. Therefore, the concentration of CO_2 after the catalyst is affected by the amount of CO that is being processed by the facility.

Operating Parameter	CO_2 concentration after the catalyst.
Logging	4 hours
Normal Range	75-125 ppm
Alarm Value	150 ppm

2. Upon recording a CO_2 concentration after the catalyst that is 150 ppm or higher, the plant technician will immediately begin to determine the cause of the alarm. Should the cause be identified as a high level of CO in the process and the problem cannot be corrected within one hour, the facility will stop production until the problem can be resolved.

LEAK DETECTION

1. The plant leak detection program is part of the normal preventive maintenance program. A standing work order (7001) is established to conduct leak checks every 60 days. Leak checks are conducted using the TIF 5500 Halogen Leak Detector.

2. The plant technician performs visual and audible checks for leaks at the beginning of the shift and during the time their duties require them to be out in the plant. Leaks are either repaired immediately depending on scope of work or a work order is prepared to have the leak repaired at the next appropriate time.

Prepared by:	Date	Approved by:	Date
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