CAM Plan
Compliance Assurance Monitoring Plan
(version dated 10/07/2008)

The following emissions units are subject to the CAM provisions only for the pollutants indicated:

E.U. ID No.	Brief Description	Pollutant(s) subject to CAM
-026 & -027	NGC Circulating Fluidized Bed Boiler Nos. 2 & 1	PM
-016 & -017	SJRPP Boiler Nos. 1 & 2	PM

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.*
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> *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.*

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E.U. ID No.	Brief Description
-026 & -027	NGC Circulating Fluidized Bed Boiler Nos. 2 & 1

2,764 MMBtu/Hr Coal And Petroleum Coke-Fired Boilers
Particulate Matter Emissions Controlled By Baghouses

Monitoring Approach and Corrective Action Procedures

Table 1. Monitoring Approach

		Compliance Indicator
I.	Indicator	Stack opacity
	Measurement Approach	Continuous opacity monitoring system (COMS)
II.	Indicator Range	An excursion is defined as 5 consecutive 6-minute averages of opacity greater than 6.0%.
III.	Performance Criteria A. Data Representativeness	Based on available data under normal operation, the representative stack opacity of each unit is < 5 %. A 50% average opacity above 5% during non-startup or shutdown periods is atypical and may indicate a potential problem with the baghouse.
	B. Verification of Operational Status	Annual testing during normal operation is used to calibrate the opacity monitor and determine the opacity and verify particulate mass loading.
	C. QA/QC Practices and Criteria	Install and operate COMS according to 40 CFR Appendix B, Performance Specification 1 and general provisions 60.13.
	D. Monitoring Frequency	Continuous.
	E. Data Collection Procedures	The COMS collects data that are reduced to 6-minute averages. (5 consecutive 6-minute averages greater than 6.0% indicate an excursion)
	F. Averaging Period	6 minutes.

Table 2. Corrective Action Procedures Summary

	Description
IV. Initiation of Corrective Action Procedures	Corrective action shall be initiated with the discovery of 5 consecutive 6-minute averages of opacity greater than the opacity that defines an excursion (as defined in Table 1). The plant staff that made the discovery shall immediately notify the shift supervisor or responsible official. This action describes a corrective action trigger.
V. Time of Completion of Corrective Action Procedures	As soon as practically possible.
VI. Corrective Action	The shift supervisor or responsible official will implement the following as a corrective action. Procedures as described in the Fabric Filter Bag Inspection and Diagnostic Procedures (FFBIDP) as presented in the Operations and Maintenance Plan (O&M Plan) includes the following alternatives that will be initiated as necessary. • Perform operational diagnostics to identify cause of the excursion. • If operational diagnostics indicate the failure of a bag(s), the failed bag will be identified and the reason for failure will be identified. • If isolation of the compartment can be accomplished to reduce opacity below the excursion, such measures will be undertaken. • In the event of the need for bag replacement, the task will be undertaken based on procedures described in the O&M Plan for the facility. Regardless of the failure mechanism, baghouse operation will be restored such that the cause of excursion is identified and appropriate actions taken to ensure opacity below excursion levels.

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E.U. ID No.	Brief Description
-016 & -017	SJRPP Boiler Nos. 1 & 2

6,144 MMBtu/Hr Coal And Petroleum Coke-Fired Boilers
Particulate Matter Emissions Controlled By ESP

Monitoring Approach and Corrective Action Procedures

Table 3. Monitoring Approach

		Compliance Indicator
I.	Indicator	Duct opacity.
	Measurement Approach	Continuous opacity monitoring system (COMS).
II.	Indicator Range	An excursion is defined as any 1-hour block average of opacity greater than 18% (other than startup and shutdown periods).
III.	Performance Criteria	
	A. Data Representativeness	Based on available data under normal operation, the representative stack opacity of each unit is in the range of 5 to 15%. In addition, the COMS are located upstream of the scrubber and as such; the opacity at the stack exit is lower than the value indicated by the COMS. Therefore, 18% opacity during non-startup or shutdown periods is atypical and may indicate a potential problem with the ESP.
	B. Verification of Operational Status	Annual testing during normal operation is used to calibrate the opacity monitor and determine the opacity and verify particulate mass loading.
	C. QA/QC Practices and Criteria	Install and operate COMS according to 40 CFR Part 60 Appendix B, Performance Specification 1 and general provisions 60.13.
	D. Monitoring Frequency	Continuous.
	E. Data Collection Procedures	The COMS collects data that are reduced to 6-minute averages and the 1-hour block average is calculated based on the 6-minute averages.
	F. Averaging Period	One hour.

Table 4. Corrective Action Procedures Summary

		Description
IV.	Initiation of Corrective Action Procedures	Corrective action shall be initiated with the discovery of a one-hour block average of opacity greater than 18% and that defines an excursion (as defined in Table 1). The plant staff that made the discovery shall immediately notify the shift Leader or responsible official. This action describes a corrective action trigger.
V.	Time of Completion of Corrective Action Procedures	As soon as practically possible.
VI.	Corrective Action	The shift Leader or responsible official will implement the following as a corrective action. Procedures, as presented in the O&M Plan, include the following alternatives that will be initiated as necessary. • Perform operational diagnostics to identify cause of the excursion. • If operational diagnostics indicate a malfunction of the ESP, the reason for failure will be identified. • In the event of the need for the unit shutdown to bring opacity to below excursion levels, the task will be undertaken based on procedures described in the O&M Plan for the facility. Regardless of the failure mechanism, ESP operation will be restored such that the cause of excursion is identified and appropriate actions taken to ensure opacity below excursion levels.