



The Chemical Company

Startup and Shutdown Procedures for Equipment With Air Pollution Control Devices

I. General Information

A. Scope

This policy and procedure applies to all externally discharging air emission sources at the BASF-Quincy Operations facility. All employees at the BASF-Quincy Operations facility are required to comply with this policy and procedure. These procedures are required during periods of startup and shutdown of pollution control equipment.

In accordance with the initial Title V Air Permit for the BASF-Quincy Operations facility, failure to comply with the requirements of the permit must be promptly reported to the Florida Department of Environmental Protection. Actions by individuals that intentionally violate the requirements of this permit may be criminally enforceable to the individual or the company.

B. Statement Of Standard

This policy and procedure defines all current production related air emission sources for the BASF-Quincy Operations. This policy and procedure outlines what actions should be followed during periods of startup and shutdown of baghouses and scrubbers used as pollution control of particulate matter.

C. Definitions

Air Emissions – Any release from the facility to the outside air. Most air emissions at this site are particulate matter (PM), which are typically viewed in the form of dust.

Emission Controls – The baghouses and scrubbers located upstream of the emission stacks for controlling or reducing air emissions.



The Chemical Company

D. Responsibilities

1. EHS Specialist

- a) Create and revise this document.
- b) Educate the site Engineering Manager, Production Manager and Site Manager on the requirements of this policy and procedure.
- c) Provide training to plant supervision for compliance with air permits for the site.
- d) Complete, file, and address issues relating to the Annual Operating Report and Annual Emission Fee.

2. Anyone Modifying, Installing, or Removing Equipment

- a) Understand and comply with the requirements of the air permit.
- b) Notify in advance the EHS Specialist of any plans to alter, upgrade, move, or remove any process equipment that could potentially effect air emissions from the site.

3. Plant Manager

- a) Address any air emission complaints with the community.
- b) Notify the EHS Specialist well in advance of any plans to increase or alter air emissions from the site.

4. Production Personnel

- a) Immediately correct or shut down emission controls and related operating equipment that is not properly performing (generating visible particulate emissions (dust)).
- b) Report recurring problems with fugitive dusting or emission control equipment that is not properly functioning.
- c) Ensure that appropriate emission controls are operating for all process equipment being operated.
- d) Document required operating parameters in ink on sheets provided, and sign your full name (not initials). Record any problems with operation and complete work orders on emission control equipment that is not properly operating.



The Chemical Company

5. Maintenance Supervision:

- a) Determine ranges of proper operation for all baghouses, and perform required maintenance when operation extends beyond the prescribed parameters.
- b) Ensure appropriate level of process change designated.
- c) Ensure technical feasibility has been considered.
- d) Ensure persons to be trained are appropriately identified.



The Chemical Company

II. PROCEDURES

Condition	Action
1	<p>Equipment Start-up</p> <p>Start emission controls prior to starting up production equipment that it is designed to control.</p> <ul style="list-style-type: none">• For baghouses, assure that blower is operational and differential pressure is registering within normal ranges. The stack should be visually checked for any visible emissions that might indicate a problem, and recorded. Any visible emissions noted in the stack requires a response to either correct the situation or shut down the equipment.• For scrubbers, water should be on at proper rates, and differential pressure properly registering >11.0" H₂O. The stack should be visually checked for any visible emissions that might indicate a problem, and recorded. . Any visible emissions noted in the stack requires a response to either correct the situation or shut down the equipment. <p>If Not, Maintenance personnel should be notified and work order entered if the problem cannot be corrected. Operation of equipment for which controls operate cannot commence until the problem is corrected.</p>



The Chemical Company

2	<p data-bbox="384 401 715 437">Equipment Shutdown</p> <p data-bbox="384 466 1353 534">Shut down production equipment that it is designed to control prior to shutting down the pollution control equipment associated with it.</p> <ul data-bbox="424 609 1412 901" style="list-style-type: none"><li data-bbox="424 609 1412 721">• For baghouses, assure all related equipment including conveyors, load points, elevators, mills, etc. have ceased operation, and that no product can be transferred into this equipment.<li data-bbox="424 791 1412 901">• For scrubbers, water should remain on the scrubber until all feed is off, all fuel has ceased feeding, and all product has cleared the system.
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