

APPENDIX CAM

Compliance Assurance Monitoring 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]

BASF Corporation Quincy Operations

Emissions Units 029 & 030

Fluid Bed Dryers
Particulate Matter Emissions Controlled by Baghouses

**COMPLIANCE ASSURANCE MONITORING PLAN:
BASF CORPORATION-QUINCY OPERATIONS**

I. Background

A. Emission Unit

Description:	Fluid Bed Dryer North
Identification:	Emission Unit 029
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-002-AV
Emission Limits:	Opacity: 5%
	Particulate Matter: 4.7 lb/hr/ 20.6 TPY

Monitoring Requirements: CAM monitoring uses a tiered approach comprised of two indicators; pressure drop and visible emissions. An excursion of the first tier indicator (pressure drop) is defined as either less than 1.0 inches of water column (in. W.C.) or greater than 5.0 in. W.C. An excursion of the first tier indicator (i.e., a pressure drop of less than 1.0 or greater than 5.0 in. W.C.) will trigger evaluation of the second tier indicator. The second tier indicator consists of a Method 22-like evaluation of visible emissions (VE). An excursion of the second tier indicator is defined as any VE (i.e. $VE > 0$, excluding water vapor). An excursion of the second tier indicator will trigger an inspection and corrective action.

<u>C. Control Technology:</u>	Flex-Kleen Baghouse (WMW 960) with 960 Nomex bags
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II. Monitoring Approach

The key elements of the monitoring approach are presented on the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Fluid Bed Dryer North – Emission Unit 029
Particulate Emissions Controlled by a Baghouse**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Baghouse pressure drop	Baghouse stack visible emissions
Measurement Approach	Baghouse pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Baghouse stack visible emissions are monitored using EPA Reference Method 22-like procedures.
II. Indicator Range	An excursion is defined as a pressure drop reading of either less than 1.0 in. W.C. or greater than 5.0 in. W.C., excluding periods of startup, shutdown, or malfunction. An excursion triggers an evaluation of Indicator No. 2 (visible emissions).	An excursion is defined as any visible emissions, excluding water vapor and excluding periods of startup, shutdown, or malfunction. An excursion triggers an immediate inspection and implementation of corrective action as soon as reasonably possible.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the baghouse inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	Visible emissions are made at the baghouse outlet stack using M 22-like procedures.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed)	Not Applicable
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated or replaced annually.	The visible emissions observer is familiar with M22 and will follow M 22-like procedures.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift or once every eight hours, whichever is more frequent.	A 6-minute M 22-like observation will be conducted as required; i.e., upon an excursion of Indicator No. 1.
D.2. Data Collection Procedures	Pressure drop is manually recorded on an air emission control form.	The EPA RM 22-like observation is documented by the observer.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is Fluid Bed Dryer North (EU 029). Emissions from the equipment in this area are controlled by twin Flex-Kleen WMW 960 baghouses with 960 bags.

B. Rationale for Selection of Performance Indicator:

Differential pressure was selected as the performance indicator for this control equipment because it is indicative of operation of these baghouses in a manner necessary to comply with the particulate emission requirements for this unit. When these baghouses are operating properly, differential pressures will remain in the prescribed range, and there will not be any visible emissions in the exhaust. Even when the bags have blinded over, which is indicated by high differential pressure, it is not necessarily an indicator that there absolutely will be visible emissions. Thus, by reacting to the differential pressure as the indicator, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that is less than 1.0 in. W.C. or that exceed 5 in. W.C. When outside this range, it will trigger a Method 22-like evaluation of the baghouse stack. If no VE's are noted, it will simply trigger a work order to have maintenance performed on the unit. Excursions trigger an inspection, corrective action, and reporting requirement. Once corrective action has been performed, another Method 22-like inspection will take place to help ensure that the problem has been corrected. Records of the correction, the problem found, and the VE results will be recorded.

**COMPLIANCE ASSURANCE MONITORING PLAN:
BASF CORPORATION-QUINCY OPERATIONS**

I. Background

A. Emission Unit

Description:	Fluid Bed Dryer South
Identification:	EU 030
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-002-AV
Emission Limits:	Opacity: 5%
	Particulate Matter: 4.7 lb/hr/ 20.6 TPY

Monitoring Requirements:	Proposed CAM monitoring uses a tiered approach comprised of two indicators; pressure drop and visible emissions. An excursion of the first tier indicator (pressure drop) is defined as either less than 1.0 inches of water column (in. W.C.) or greater than 5.0 in. W.C. An excursion of the first tier indicator (i.e., a pressure drop of less than 1.0 or greater than 5.0 in. W.C.) will trigger evaluation of the second tier indicator. The second tier indicator consists of a Method 22-like evaluation of visible emissions (VE). An excursion of the second tier indicator is defined as any VE (i.e. $VE > 0$, excluding water vapor). An excursion of the second tier indicator will trigger an inspection and corrective action.
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<u>C. Control Technology:</u>	Flex-Kleen Baghouse (WMW 960) with 960 Nomex bags
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II. Monitoring Approach

The key elements of the monitoring approach are presented on the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Fluid Bed Dryer South – Emission Unit 030
Particulate Emissions Controlled by a Baghouse**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Baghouse pressure drop	Baghouse stack visible emissions
Measurement Approach	Baghouse pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Baghouse stack visible emissions are monitored using EPA Reference Method 22-like procedures.
II. Indicator Range	An excursion is defined as a pressure drop reading of either less than 1.0 in. W.C. or greater than 5.0 in. W.C., excluding periods of startup, shutdown, or malfunction. An excursion triggers an evaluation of Indicator No. 2 (visible emissions).	An excursion is defined as any visible emissions, excluding water vapor and excluding periods of startup, shutdown, or malfunction. An excursion triggers an immediate inspection and implementation of corrective action as soon as reasonably possible.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the baghouse inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	Visible emissions are made at the baghouse outlet stack using M 22-like procedures.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed)	Not Applicable
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated or replaced annually.	The visible emissions observer is familiar with M22 and will follow RM 22-like procedures.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift or once every eight hours, whichever is more frequent.	A 6-minute EPA RM 22-like observation will be conducted as required; i.e., upon an excursion of Indicator No. 1.
D.2. Data Collection Procedures	Pressure drop is manually recorded on an air emission control form.	The EPA RM 22-like observation is documented by the observer.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is Fluid Bed Dryer South (EU 030). Emissions from the equipment in this area are controlled by twin Flex-Kleen WMW 960 baghouses with 960 bags.

B. Rationale for Selection of Performance Indicator:

Differential pressure was selected as the performance indicator for this control equipment because it is indicative of operation of these baghouses in a manner necessary to comply with the particulate emission requirements for this unit. When these baghouses are operating properly, differential pressures will remain in the prescribed range, and there will not be any visible emissions in the exhaust. Even when the bags have blinded over, which is indicated by high differential pressure, it is not necessarily an indicator that there absolutely will be visible emissions. Thus, by reacting to the differential pressure as the indicator, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that is less than 1.0 in. W.C. or exceed 5 in. W.C. When outside of this range, it will trigger a Method 22-like evaluation of the baghouse stack. If no VE's are noted, it will simply trigger a work order to have maintenance performed on the unit. Excursions trigger an inspection, corrective action, and reporting requirement. Once corrective action has been performed, another Method 22-like inspection will take place to help ensure that the problem has been corrected. Records of the correction, the problem found, and the VE results will be recorded.

BASF Corporation Quincy Operations

Emissions Units 014 & 015

Drying Kilns No. 1 and No. 2
Particulate Matter Emissions Controlled by a Venturi Scrubber

**COMPLIANCE ASSURANCE MONITORING PLAN:
BASF CORPORATION-QUINCY OPERATIONS**

I. Background	
A. <u>Emission Unit</u>	
Description:	#1 Kiln Scrubber
Identification:	EU 014
Facility:	BASF Corporation-Quincy Operations
B. <u>Applicable Regulation, Emission Limit, and Monitoring Requirements</u>	
Regulation No.:	Permit No. 0390005-002-AV
Emission Limits:	Opacity: 5% Particulate Matter: 4.2 lb/hr /18.4 TPY
Monitoring Requirements:	CAM monitoring uses a multi-parameter approach comprised of two indicators; differential pressure and scrubbing liquid flow. An excursion of the first indicator (pressure drop) is defined as any reading less than 11.0 inches of water column (in. W.C.). The second indicator consists of the scrubbing liquid flow rate to the scrubber, which is measured by an in-line flow meter. An excursion of the second tier indicator is defined as any reading outside of the 200-400 gallons per minute (gpm) range of flow.
C. <u>Control Technology:</u>	Venturi Scrubber

II. Monitoring Approach

The key elements of the monitoring approach are presented in the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Drying Kiln No. 1 – Emission Unit 014
Particulate Emissions Controlled by a Venturi Scrubber**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Scrubber pressure drop	Scrubber liquid water flow
Measurement Approach	Scrubber pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Scrubber liquid water flow is monitored with a flowmeter located on the circulation water to the scrubber, reading in gallons per minute (gpm).
II. Indicator Range	An excursion is defined as a pressure drop reading less than 11.0 in. W.C., excluding periods of startup, shutdown, or malfunction.	An excursion is defined as flow less than 200 gpm or greater than 400 gpm.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the scrubber inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	The flowmeter is located in the scrubber water recirculation line. The accuracy of the flowmeter is 1.0% of full scale.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed).	A flowmeter is currently installed.
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated annually.	The flowmeter is calibrated in accordance with manufacturers recommendations.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift or once every eight hours, whichever is more frequent.	Flowmeter indication is recorded once every shift and prescribed range is alarmed at the operator control station.
D.2. Data Collection Procedures	Pressure drop is recorded on an air emission control form or recorded electronically.	Scrubber water flow is recorded on an air emission control form or recorded electronically.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is #1 Kiln Scrubber (High Temperature Drying Kiln #1) (EU 014). Emissions from the equipment in this area are controlled by a venturi scrubber.

B. Rationale for Selection of Performance Indicator:

Differential pressure and scrubber water flow were selected as the performance indicators for this control equipment because they are indicative of operation of this scrubber in a manner necessary to comply with the particulate emission requirements for this unit. When the scrubber is operating properly, differential pressures and scrubber water flows will remain in the prescribed ranges, and there will not be any visible emissions in the exhaust. Thus, by reacting to the differential pressure and/or scrubber water flow as the indicators, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that below 11" W.C. as an excursion. For the recycle water flow, normal operation outside of the 200-400 gpm operating range is an excursion. Excursions trigger an inspection, corrective action, and a reporting requirement. When a flow meter reading outside these ranges is recorded while the unit is operational, it will trigger an adjustment to the scrubber to bring the water flow/differential pressure back into range.

**COMPLIANCE ASSURANCE MONITORING PLAN:
BASF CORPORATION-QUINCY OPERATIONS**

I. Background	
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<u>A. Emission Unit</u>	
Description:	#2 Kiln Scrubber
Identification:	Emission Point #15
Facility:	BASF Corporation-Quincy Operations
<u>B. Applicable Regulation, Emission Limit, and Monitoring Requirements</u>	
Regulation No.:	Original BACT Determination, permit
Emission Limits:	Opacity: 5% Particulate Matter: 4.4 #/hr /19.3 TPY
Monitoring Requirements:	CAM monitoring uses a multi-parameter approach comprised of two indicators; differential pressure and scrubbing liquid flow. An excursion of the first indicator (pressure drop) is defined as any reading less than 11.0 inches of water column (in. W.C.) The second indicator consists of the scrubbing liquid flow rate to the scrubber, which is measured by an in-line flow meter. An excursion of the second tier indicator is defined as any reading outside of the 300-500 gallons per minute range of flow.
<u>C. Control Technology:</u>	Venturi Scrubber

II. Monitoring Approach

The key elements of the monitoring approach are presented in the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Drying Kiln No. 2 – Emission Unit 015
Particulate Emissions Controlled by a Venturi Scrubber**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Scrubber pressure drop	Scrubber liquid water flow
Measurement Approach	Scrubber pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Scrubber liquid water flow is monitored with a flowmeter located on the circulation water to the scrubber, reading in gallons per minute (gpm).
II. Indicator Range	An excursion is defined as a pressure drop reading less than 11.0 in. W.C., excluding periods of startup, shutdown, or malfunction.	An excursion is defined as flow less than 300 gpm or greater than 500 gpm.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the scrubber inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	The flowmeter is located in the scrubber water recirculation line. The accuracy of the flowmeter is 1.0% of full scale.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed)	A flowmeters is currently installed.
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated annually.	The flowmeter is calibrated in accordance with manufacturers recommendations.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift change or once every eight hours, whichever is more frequent.	Flowmeter indication is recorded once every shift and prescribed range is alarmed at the operator control station.
D.2. Data Collection Procedures	Pressure drop is recorded on an air emission control form or recorded electronically.	Scrubber water flow is recorded on an air emission control form or recorded electronically.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is #2 Kiln Scrubber (High Temperature Drying Kiln #2) (EU 015). Emissions from the equipment in this area are controlled by a venturi scrubber.

B. Rationale for Selection of Performance Indicator:

Differential pressure and scrubber water flow were selected as the performance indicators for this control equipment because they are indicative of operation of this scrubber in a manner necessary to comply with the particulate emission requirements for this unit. When the scrubber is operating properly, differential pressures and scrubber water flows will remain in the prescribed ranges, and there will not be any visible emissions in the exhaust. Thus, by reacting to the differential pressure and/or scrubber water flow as the indicators, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that below 11 in. W.C. as an excursion. For the recycle water flow, normal operation outside of the 300-500 gpm operating range is an excursion. Excursions trigger an inspection, corrective action, and a reporting requirement. When a flow meter reading outside these ranges is recorded while the unit is operational, it will trigger an adjustment to the scrubber to bring the water flow/differential pressure back into range.

BASF Corporation Quincy Operations

Emissions Units 002, 008, & 019

Williams Mills No. 4A, No. 4, and No. 4B
Particulate Matter Emissions Controlled by a Venturi Scrubber

**COMPLIANCE ASSURANCE MONITORING PLAN
BASF CORPORATION-QUINCY OPERATIONS**

I. Background

A. Emission Unit

Description:	#4A Mill Scrubber
Identification:	EU 002
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-002-AV
Emission Limits:	Opacity: 5%
	Particulate Matter: 7.0 lb/hr /30.7 TPY

Monitoring Requirements:	CAM monitoring uses a multi-parameter approach comprised of two indicators; differential pressure and scrubbing liquid flow. An excursion of the first indicator (pressure drop) is defined as any reading less than 11.0 inches of water column (in. W.C.). The second indicator consists of the scrubbing liquid flow rate to the scrubber, which is measured by an in-line flow meter. An excursion of the second tier indicator is defined as any reading outside of the 150-400 gallons per minute (gpm) range of flow.
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<u>C. Control Technology:</u>	Stansteel Venturi-impactor high efficiency scrubber Model D
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II. Monitoring Approach

The key elements of the monitoring approach are presented in the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Williams Mill No. 4A – Emission Unit 002
Particulate Emissions Controlled by a Venturi Scrubber**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Scrubber pressure drop	Scrubber liquid water flow
Measurement Approach	Scrubber pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Scrubber liquid water flow is monitored with a flowmeter located on the circulation water to the scrubber, reading in gallons per minute (gpm).
II. Indicator Range	An excursion is defined as a pressure drop reading less than 11.0 in. W.C., excluding periods of startup, shutdown, or malfunction.	An excursion is defined as flow less than 150 gpm or greater than 400 gpm.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the scrubber inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	The flowmeter is located in the scrubber water recirculation line. The accuracy of the flowmeter is 1.0% of full scale.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed)	A flowmeter is currently installed.
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated annually.	The flowmeter is calibrated in accordance with manufacturers recommendations.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift change or once every eight hours, whichever is more frequent.	Flowmeter indication is recorded once every shift and prescribed range is alarmed at the operator control station.
D.2. Data Collection Procedures	Pressure drop is recorded on an air emission control form or recorded electronically.	Scrubber water flow is recorded on an air emission control form or recorded electronically.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is #4A Mill (Mill #4A) (EU 002). Emissions from the equipment in this area are controlled by a venturi scrubber.

B. Rationale for Selection of Performance Indicator:

Differential pressure and scrubber water flow were selected as the performance indicators for this control equipment because they are indicative of operation of this scrubber in a manner necessary to comply with the particulate emission requirements for this unit. When the scrubber is operating properly, differential pressures and scrubber water flows will remain in the prescribed ranges, and there will not be any visible emissions in the exhaust. Thus, by reacting to the differential pressure and/or scrubber water flow as the indicators, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that below 11 in. W.C. as an excursion. For the recycle water flow, normal operation outside of the 150-400 gpm operating range is an excursion. Excursions trigger an inspection, corrective action and a reporting requirement. When a flow meter reading outside these ranges is recorded while the unit is operational, it will trigger an adjustment to the scrubber to bring the water flow/differential pressure back into range.

**COMPLIANCE ASSURANCE MONITORING PLAN
BASF CORPORATION-QUINCY OPERATIONS**

<u>I. Background</u>															
<p><u>A. Emission Unit</u></p> <table style="width: 100%;"> <tr> <td style="width: 35%;">Description:</td> <td>#4 Mill Scrubber</td> </tr> <tr> <td>Identification:</td> <td>EU 008</td> </tr> <tr> <td>Facility:</td> <td>BASF Corporation-Quincy Operations</td> </tr> </table> <p><u>B. Applicable Regulation, Emission Limit, and Monitoring Requirements</u></p> <table style="width: 100%;"> <tr> <td style="width: 35%;">Regulation No.:</td> <td>Permit No. 0390005-002-AV</td> </tr> <tr> <td>Emission Limits:</td> <td>Opacity: 5%</td> </tr> <tr> <td></td> <td>Particulate Matter: 7.0 lb/hr /30.7 TPY</td> </tr> <tr> <td>Monitoring Requirements:</td> <td> <p>CAM monitoring uses a multi-parameter approach comprised of two indicators; differential pressure and scrubbing liquid flow. An excursion of the first indicator (pressure drop) is defined as any reading less than 11.0 inches of water column (in. W.C.). The second indicator consists of the scrubbing liquid flow rate to the scrubber, which is measured by an in-line flow meter. An excursion of the second tier indicator is defined as any reading outside of the 150-400 gallons per minute (gpm) range of flow.</p> </td> </tr> </table> <p><u>C. Control Technology:</u> Stansteel Venturi-impactor high efficiency scrubber Model D</p>		Description:	#4 Mill Scrubber	Identification:	EU 008	Facility:	BASF Corporation-Quincy Operations	Regulation No.:	Permit No. 0390005-002-AV	Emission Limits:	Opacity: 5%		Particulate Matter: 7.0 lb/hr /30.7 TPY	Monitoring Requirements:	<p>CAM monitoring uses a multi-parameter approach comprised of two indicators; differential pressure and scrubbing liquid flow. An excursion of the first indicator (pressure drop) is defined as any reading less than 11.0 inches of water column (in. W.C.). The second indicator consists of the scrubbing liquid flow rate to the scrubber, which is measured by an in-line flow meter. An excursion of the second tier indicator is defined as any reading outside of the 150-400 gallons per minute (gpm) range of flow.</p>
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II. Monitoring Approach

The key elements of the monitoring approach are presented in the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Williams Mill No. 4– Emission Unit 008
Particulate Emissions Controlled by a Venturi Scrubber**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Scrubber pressure drop	Scrubber liquid water flow
Measurement Approach	Scrubber pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Scrubber liquid water flow is monitored with a flowmeter located on the circulation water to the scrubber, reading in gallons per minute (gpm).
II. Indicator Range	An excursion is defined as a pressure drop reading less than 11.0 in. W.C., excluding periods of startup, shutdown, or malfunction.	An excursion is defined as flow less than 150 gpm or greater than 400 gpm.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the scrubber inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	The flowmeter is located in the scrubber water recirculation line. The accuracy of the flowmeter is 1.0% of full scale.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed)	A flowmeter are currently installed.
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated annually.	The flowmeter is calibrated in accordance with manufacturers recommendations.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift change or once every eight hours, whichever is more frequent.	Flowmeter indication is recorded once every shift and prescribed range is alarmed at the operator control station.
D.2. Data Collection Procedures	Pressure drop is recorded on an air emission control form or recorded electronically.	Scrubber water flow is recorded on an air emission control form or recorded electronically.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is #4 Mill (Mill #4) (EU 008). Emissions from the equipment in this area are controlled by a venturi scrubber.

B. Rationale for Selection of Performance Indicator:

Differential pressure and scrubber water flow were selected as the performance indicators for this control equipment because they are indicative of operation of this scrubber in a manner necessary to comply with the particulate emission requirements for this unit. When the scrubber is operating properly, differential pressures and scrubber water flows will remain in the prescribed ranges, and there will not be any visible emissions in the exhaust. Thus, by reacting to the differential pressure and/or scrubber water flow as the indicators, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that below 11 in. W.C. as an excursion. For the recycle water flow, normal operation outside of the 150-400 gpm operating range will be considered an excursion. Excursions trigger an inspection, corrective action, and a reporting requirement. When a flow meter reading outside these ranges is recorded while the unit is operational, it will trigger an adjustment to the scrubber to bring the water flow/differential pressure back into range.

**COMPLIANCE ASSURANCE MONITORING PLAN
BASF CORPORATION-QUINCY OPERATIONS**

I. Background	
<hr/>	
<u>A. Emission Unit</u>	
Description:	#4B Mill Scrubber
Identification:	EU 019
Facility:	BASF Corporation-Quincy Operations
<u>B. Applicable Regulation, Emission Limit, and Monitoring Requirements</u>	
Regulation No.:	Permit No. 0390005-002-AV
Emission Limits:	Opacity: 5% Particulate Matter: 7.0 lb/hr /30.7 TPY
Monitoring Requirements:	CAM monitoring uses a multi-parameter approach comprised of two indicators; differential pressure and scrubbing liquid flow. An excursion of the first indicator (pressure drop) is defined as any reading less than 11.0 inches of water column (in. W.C.). The second indicator consists of the scrubbing liquid flow rate to the scrubber, which is measured by an in-line flow meter. An excursion of the second tier indicator is defined as any reading outside of the 150-400 gallons per minute (gpm) range of flow.
<u>C. Control Technology:</u>	Stansteel Venturi-impactor high efficiency scrubber Model D

II. Monitoring Approach

The key elements of the monitoring approach are presented in the attached table:

**BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN**

**Williams Mill No. 4B – Emission Unit 019
Particulate Emissions Controlled by a Venturi Scrubber**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Scrubber pressure drop	Scrubber liquid water flow
Measurement Approach	Scrubber pressure drop is monitored with a Magnehelic™ diaphragm-based pressure gauge (or equivalent).	Scrubber liquid water flow is monitored with a flowmeter located on the circulation water to the scrubber, reading in gallons per minute (gpm).
II. Indicator Range	An excursion is defined as a pressure drop reading less than 11.0 in. W.C., excluding periods of startup, shutdown, or malfunction.	An excursion is defined as flow less than 150 gpm or greater than 400 gpm.
III. Performance Criteria		
A. Data Representativeness	The pressure drop sensors (pressure line taps) are located at the scrubber inlet and outlet. Accuracy of the pressure gauge is 2.0% of full scale.	The flowmeter is located in the scrubber water recirculation line. The accuracy of the flowmeter is 1.0% of full scale.
B. Verification of Operational Status	Not Applicable (pressure drop gauges are currently installed)	A flowmeter is currently installed.
C. Quality Assurance and Control Practices and Criteria	Pressure lines are inspected daily for plugging. Pressure gauge is calibrated annually.	The flowmeter is calibrated in accordance with manufacturers recommendations.
D.1. Monitoring Frequency	Pressure drop is monitored once every shift change or once every eight hours, whichever is more frequent.	Flowmeter indication is recorded once every shift and prescribed range is alarmed at the operator control station.
D.2. Data Collection Procedures	Pressure drop is recorded on an air emission control form or recorded electronically.	Scrubber water flow is recorded on an air emission control form or recorded electronically.
D.3. Averaging Period	Not Applicable.	Not Applicable.

III. Justification

A. Background:

The pollutant specific emission unit is #4B Mill (Mill #4B) (EU 019). Emissions from the equipment in this area are controlled by a venturi scrubber.

B. Rationale for Selection of Performance Indicator:

Differential pressure and scrubber water flow were selected as the performance indicators for this control equipment because they are indicative of operation of this scrubber in a manner necessary to comply with the particulate emission requirements for this unit. When the scrubber is operating properly, differential pressures and scrubber water flows will remain in the prescribed ranges, and there will not be any visible emissions in the exhaust. Thus, by reacting to the differential pressure and/or scrubber water flow as the indicators, the operator will avoid reaching a level of emissions that would be considered an excursion.

C. Rationale for Selection of Performance Indicator Level:

The selected indicator range is a differential pressure reading that below 11 in. W.C. as an excursion. For the recycle water flow, normal operation outside of the 150-400 gpm operating range is an excursion. When a flow meter reading outside these ranges is recorded while the unit is operational, it will trigger an adjustment to the scrubber to bring the water flow/differential pressure back into range. Excursions trigger an inspection, corrective action, and a reporting requirement.