

BASF Corporation Quincy Operations

Emissions Unit 030

Fluid Bed Dryer
Particulate Matter Emissions Controlled by Baghouses

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

I. Background

A. Emission Unit

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

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-014-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.

C. Control Technology:

Twin Flex-Kleen Baghouses (WMW 960) with 1920 Nomex bags. Each baghouse contains 960 bags. The total number of bags associated with the stack is 1920.

II. Monitoring Approach

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

BASF CORPORATION QUINCY OPERATIONS
COMPLIANCE ASSURANCE MONITORING PLAN
 South Fluid Bed Dryer Dust Collector – 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 or recorded electronically.	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 1920 bags. Each baghouse has 960 bags. The total number of bags associated with the stack is 1920.

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. Emission Unit

Description:	No. 1 Kiln Scrubber
Identification:	EU 014
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-014-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. Control Technology: 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**

**No. 1 Kiln Scrubber – 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 No. 1 Kiln Scrubber (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

A. Emission Unit

Description:	No. 2 Kiln Scrubber
Identification:	EU 015
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 039005-014-AV
Emission Limits:	Opacity: 5%
	Particulate Matter: 4.4 lb/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 200-400 gallons per minute (gpm) range of flow.

C. Control Technology: 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**

**No. 2 Kiln Scrubber – 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 No. 2 Kiln Scrubber (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:	No. 4A Mill Scrubber
Identification:	EU 002
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-014-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.
--------------------------	--

C. <u>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**

**No. 4A Mill Scrubber – 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 No. 4A Mill Scrubber (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**

I. Background

A. Emission Unit

Description:	No 4 Mill Scrubber
Identification:	EU 008
Facility:	BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0390005-014-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.

C. Control Technology: 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**

**No. 4 Mill Scrubber– 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 No. 4 Mill Scrubber (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

A. Emission Unit

Description: No 4B Mill Scrubber
Identification: EU 019
Facility: BASF Corporation-Quincy Operations

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Permit No. 0390005-014-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.

C. Control Technology: 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**

**No. 4B Mill Scrubber – 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 No. 4B Mill Scrubber (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.