

STATEMENT OF BASIS

Title V Air Operation Permit Revision Permit No. 0390005-017-AV

APPLICANT

The applicant for this project is BASF Corporation. The applicant's responsible official and mailing address are: Mr. Anthony L. Fedd, Site Manager, BASF Corporation, Quincy Operations, 1101 North Madison Street, Quincy, Florida 32352.

FACILITY DESCRIPTION

This facility is an Attapulgitic Clay and Fullers Earth processing plant and consists of a raw clay receiving area, a primary crusher, crude granular clay and crude gelling clay covered storage areas, and granular clay and gelling clay product process lines. Granular processing essentially consists of crushing, drying, sizing and packing. Gel processing consists essentially of crushing, extruding with additives (magnesium oxide), drying/milling, classifying and packing. Emissions of particulate matter resulting from clay handling and processing are controlled by baghouses. Some of the natural gas or propane-fired equipment (Granular Clay Kilns, Gelling Clay Hammermills) is controlled by scrubbers.

The facility includes emissions units subject to NSPS (40 CFR 60 subpart OOO) as a result of the date of construction of the affected equipment. These emissions units have particulate emissions controlled by a baghouses and include the Gel Clay Production Equipment, and the ACM Milling/Ultra Fine Grind Equipment. The permit limits are comparable or more stringent than those required by NSPS and include 5% opacity limits. The clay mining areas are not contiguous with the process plant areas, and are not included in this Title V Facility permit.

The facility is subject to a facility-wide limit of 124 tons per year of NO_x associated with a BACT determination for the construction of the north and south fluid bed dryers (Construction Permits AC20-41424 and AC2041425, issued August 4, 1981).

Since BASF has a potential-to-emit of greater than 250 tons per year of PM (297 tons/yr), the facility is a major source under Prevention of Significant Deterioration (PSD) and any future modifications and/or construction must be evaluated with respect to the preconstruction review requirements of Chapter 62-212, F.A.C. This facility is not a major source of hazardous air pollutants (HAP).

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility and to incorporate the terms and conditions of permit No. 0390005-018-AC, being concurrently processed, to include the addition of a portable bulk bag reclamation system; updated fan ratings and flow rates; and to correct baghouse manufacturer information. These changes will not affect the emissions. This revision will also modify the equipment nomenclature; update CAM Plan language to allow for baghouse pressure drop data to be collected either manually or electronically and correct the number of bags in the fluid bed dryer baghouses' descriptions.

The revision will also reflect that: the facility also has spare pressure indicators and strap on flow meters to use in as a back-up in case the primary indicators or meters fail, update the List of Insignificant Activities to include: 250 gallon mercaptan tank used for odorizing natural gas, and include House-cleaning and Clean-Up Related activities. These changes will not affect the emissions.

STATEMENT OF BASIS

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued March 16, 1999
Application for a Title V Air Operation Permit Revision received June 06, 2013
Additional Information Request dated June 26, 2013
Additional Information Response received August 8, 2013
Notice of Intent to Issue Air Permit issued August 16, 2013
Public Notice Published August 29, 2013

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Emissions Units 002, 008 and 019 are subject to CAM and associated monitoring requirements. These include monitoring the scrubber pressure differentials and liquid water flows.

Emission units 014 and 015 are subject to CAM and associated monitoring requirements. These include monitoring the scrubber pressure differentials and liquid water flows.

Emission unit 030 is subject to CAM and associated monitoring requirements. These include monitoring the baghouse pressure differentials and conducting visible emissions monitoring if the pressure differentials fall outside the specified range.

PROJECT REVIEW

This revision incorporates permit 0390005-018-AC that allowed modifications to emissions units 022, 023 and 024 by adding a portable bulk bag reclamation system. The portable bulk bag reclamation system has no specific requirements under 40 CFR 60 subpart OOO and the installation will not result in an overall emissions increase. Emissions are controlled by dust collectors. Emission limits remain unchanged from the permitted PM limit of 0.017 gpdscf (applicant's request, used as supporting information in original construction permit applications).

CONCLUSION

This project revises Title V air operation permit No. 0390005-014-AV, which was issued on January 26, 2010. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

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Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(version dated 02/05/97) (continued)

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Air Permit Action List

[If any of the time deadlines in the Air Permit Action List are inconsistent with a time deadline in a permit condition, the time deadline in the permit condition shall be followed.]

SOURCE	ACTION	DUE DATE
Facility-Wide Facility-Wide Facility-Wide	Annual Operating Report [62-210.370(3)]	April 1 (Annually)
	Annual Emissions Fee Form and Fee [62-213.205]	March 1 (Annually)
	Annual Statement of Compliance[62-213.440(3) and 62-213.900]	Before 60 days after end of Calendar Year
EU's 017, 021, 022, 023, 024, 025, 026	VE Test Notification	15 days before testing
	VE Test (Initial Test for EU 017, 022, 023, and 024)	Must be scheduled and performed prior to June 14, 2014
	VE Test (for EU 017, 021, 022, 023, 024, 025 and 026)	Must be scheduled and performed prior to June 14, 2014
	VE Test Report	45 days after testing
	On-Site Recordkeeping [62-210.200(PTE)]	at time of inspection
EU's 013, 016, 018, 020 and 028	VE Test Notification	15 days before testing
	VE Test-Method 9(for EU 013 and 018 only)	Initial Test prior to June 14, 2014
	VE Test-Method 9 (for EU's 013, 016, 018, 020 and 028)	Once during each Federal Fiscal Year (FFY)
	VE Test (Method 22)	Twice during the lifetime of this permit and generally at 24-month intervals
	VE Test Report	45 days after testing
	Records & Reports [60.676]	As required
	On-Site Recordkeeping [62-210.200(PTE)]	at time of inspection
EU's 011, 031, 032, 033, 035 and 036	VE Test Notification	15 days before testing
	VE Test-Method 9	Once during each FFY
	VE Test (Method 22)	Twice during the lifetime of this permit and generally at 24-month intervals
	VE Test Report	45 days after testing
	Records & Reports [60.676]	As required
	On-Site Recordkeeping [62-210.200(PTE)]	at time of inspection
EU 030	VE Test Notification	15 days before testing
	VE Test	Must be scheduled and performed prior to June 14, 2014

	VE Test Report	45 days after testing
	Semi-annual Report [40 CFR 64.9]	January 31 and July 31
	On-Site Recordkeeping [62-213.440(1)]	at time of inspection
EU 014 and EU 015	VE Test Notification	15 days before testing
	VE Test	Must be scheduled and performed prior to June 14, 2014
	VE Test Report	45 days after testing
	Semi-annual Report [40 CFR 64.9]	January 31 and July 31
	On-Site Recordkeeping [62-210.200(PTE)]	at time of inspection
	On-Site Recordkeeping [62-213.440(1)]	at time of inspection
EU's 002, 008 and 019	VE Test Notification	15 days before testing
	VE Test	Must be scheduled and performed prior to June 14, 2014
	VE Test Report	45 days after testing
	Semi-annual Report [40 CFR 64.9]	January 31 and July 31
	On-Site Recordkeeping [62-210.200(PTE)]	at time of inspection
EU 038 and EU 039	VE Test Notification	15 days before testing
	VE Test (Initial Test for EU 038 (points 38 & 54) and EU 039 (point 48))	Must be scheduled and performed prior to June 14, 2014
	VE Test (Method 9)	Once during each FFY
	VE Test (Method 22)	Twice during the lifetime of this permit and generally at 24-month intervals
	VE Test Report	45 days after testing
	Records & Reports [60.676]	As required
	On-Site Recordkeeping [62-210.200(PTE)]	at time of inspection

Appendix I-1: List of Insignificant Emissions Units and/or Activities.

BASF Corporation
Quincy Operations

FINAL Title V Operation Permit Revision No.: 0390005-017-AV
Facility ID No.: 0390005

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62-210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Propane System
 - A. Propane Vaporizer
 - B. Propane tanks
 - C. Personnel propane fired heaters (approximately 10 locations)
2. Parts Washers
 - A. Plant Machine Shop
 - B. Mining Truck Shop
3. Diesel Fuel Storage (five 500 gallon tanks) and refueling operations
4. Gasoline Storage Tanks (one 500 gallon tank) and refueling operations
5. Portable Welders, Pumps, Air Compressors and Generators
6. Lawn maintenance equipment
7. Comfort Cooling Air Conditioner Systems (<50 lbs)
8. Mobile Sources, including vehicles, trucks and equipment
9. Sandblasting and abrasive grit blasting
10. Internal combustion engines – mobile sources
11. Lab equipment used for chemical or physical analyses
12. Brazing, soldering and welding equipment
13. Mercaptan Tank (used for odorizing natural gas-250 gallon)
14. House cleaning and clean-up related activities.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.
2. The ports shall be capable of being sealed when not in use.
3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
(continued)

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

Operation

- TV1. General Prohibition.** A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit. [Rule 62-4.030, Florida Administrative Code (F.A.C.)]
- TV2. Validity.** This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department. [Rule 62-4.160(2), F.A.C.]
- TV3. Proper Operation and Maintenance.** The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules. [Rule 62-4.160(6), F.A.C.]
- TV4. Not Federally Enforceable. Health, Safety and Welfare.** To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. [Rule 62-4.050(3), F.A.C.]
- TV5. Continued Operation.** An applicant making timely and complete application for permit, or for permit renewal, shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program and applicable requirements of the CAIR Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C. [Rules 62-213.420(1)(b)2., F.A.C.]
- TV6. Changes Without Permit Revision.** Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation:
- a. Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;
 - b. A permitted source may implement operating changes, as defined in Rule 62-210.200, F.A.C., after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;
 - (1) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;
 - (2) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;
 - c. Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.
- [Rule 62-213.410, F.A.C.]
- TV7. Circumvention.** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Compliance

- TV8. Compliance with Chapter 403, F.S., and Department Rules.** Except as provided at Rule 62-213.460, Permit Shield, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules. [Rule 62-4.070(7), F.A.C.]

APPENDIX TV
TITLE V GENERAL CONDITIONS
(Version Dated 02/16/2012)

- TV9. Compliance with Federal, State and Local Rules.** Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of a facility or an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
- TV10. Binding and enforceable.** The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions. [Rule 62-4.160(1), F.A.C.]
- TV11. Timely information.** When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly. [Rule 62-4.160(15), F.A.C.]
- TV12. Halting or reduction of source activity.** It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity. [Rule 62-213.440(1)(d)3., F.A.C.]
- TV13. Final permit action.** Any Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C. [Rule 62-213.440(1)(d)4., F.A.C.]
- TV14. Sudden and unforeseeable events beyond the control of the source.** A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference. [Rule 62-213.440(1)(d)5., F.A.C.]
- TV15. Permit Shield.** Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall, as of the effective date of the permit, be deemed compliance with any applicable requirements in effect, provided that the source included such applicable requirements in the permit application. Nothing in this condition or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program or the CAIR Program. [Rule 62-213.460, F.A.C.]
- TV16. Compliance With Federal Rules.** A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. Nothing in this chapter shall relieve a facility or emissions unit from complying with such standard or requirement, provided, however, that where a facility or emissions unit is subject to a standard established in Rule 62-296, F.A.C., such standard shall also apply. [Rule 62-296.100(3), F.A.C.]

Permit Procedures

- TV17. Permit Revision Procedures.** The permittee shall revise its permit as required by Rules 62-213.400, 62-213.412, 62-213.420, 62-213.430 & 62-4.080, F.A.C.; and, in addition, the Department shall revise permits as provided in Rule 62-4.080, F.A.C. & 40 CFR 70.7(f).
- TV18. Permit Renewal.** The permittee shall renew its permit as required by Rules 62-4.090, 62.213.420(1) and 62-213.430(3), F.A.C. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information

APPENDIX TV

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

identified in Rules 62-210.900(1) [Application for Air Permit - Long Form], 62-213.420(3) [Required Information], 62-213.420(6) [CAIR Part Form], F.A.C. Unless a Title V source submits a timely and complete application for permit renewal in accordance with the requirements this rule, the existing permit shall expire and the source's right to operate shall terminate. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009. No Title V permit will be issued for a new term except through the renewal process. [Rules 62-213.420 & 62-213.430, F.A.C.]

TV19. Insignificant Emissions Units or Pollutant-Emitting Activities. The permittee shall identify and evaluate insignificant emissions units and activities as set forth in Rule 62-213.430(6), F.A.C.

TV20. Savings Clause. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect. [Rule 62-213.440(1)(d)1., F.A.C.]

TV21. Suspension and Revocation.

- a. Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.
- b. Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.
- c. A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or his agent:
 - (1) Submitted false or inaccurate information in his application or operational reports.
 - (2) Has violated law, Department orders, rules or permit conditions.
 - (3) Has failed to submit operational reports or other information required by Department rules.
 - (4) Has refused lawful inspection under Section 403.091, F.S.
- d. No revocation shall become effective except after notice is served by personal services, certified mail, or newspaper notice pursuant to Section 120.60(5), F.S., upon the person or persons named therein and a hearing held if requested within the time specified in the notice. The notice shall specify the provision of the law, or rule alleged to be violated, or the permit condition or Department order alleged to be violated, and the facts alleged to constitute a violation thereof.

[Rule 62-4.100, F.A.C.]

TV22. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules. [Rule 62-4.110, F.A.C.]

TV23. Emissions Unit Reclassification.

- a. Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.
- b. If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

TV24. Transfer of Permits. Per Rule 62-4.160(11), F.A.C., this permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility. The permittee shall also comply with the

APPENDIX TV
TITLE V GENERAL CONDITIONS
(Version Dated 02/16/2012)

requirements of Rule 62-210.300(7), F.A.C., and use DEP Form No. 62-210.900(7). [Rules 62-4.160(11), 62-4.120, and 62-210.300(7), F.A.C.]

Rights, Title, Liability, and Agreements

TV25. Rights. As provided in Subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit. [Rule 62-4.160(3), F.A.C.]

TV26. Title. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. [Rule 62-4.160(4), (F.A.C.)]

TV27. Liability. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department. [Rule 62-4.160(5), F.A.C.]

TV28. Agreements.

- a. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (1) Have access to and copy any records that must be kept under conditions of the permit;
 - (2) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
 - (3) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
- b. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- c. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

[Rules 62-4.160(7), (9), and (10), F.A.C.]

Recordkeeping and Emissions Computation

TV29. Permit. The permittee shall keep this permit or a copy thereof at the work site of the permitted activity. [Rule 62-4.160(12), F.A.C.]

TV30. Recordkeeping.

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:

APPENDIX TV
TITLE V GENERAL CONDITIONS
(Version Dated 02/16/2012)

- (1) The date, exact place, and time of sampling or measurements, and the operating conditions at the time of sampling or measurement;
- (2) The person responsible for performing the sampling or measurements;
- (3) The dates analyses were performed;
- (4) The person and company that performed the analyses;
- (5) The analytical techniques or methods used;
- (6) The results of such analyses.

[Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]

TV31. Emissions Computation. Pursuant to Rule 62-210.370, F.A.C., the following required methodologies are to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with Rule 62-210.370, F.A.C. Rule 62-210.370, F.A.C., is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.

For any of the purposes specified above, the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

- a. *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (1) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (2) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (3) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- b. *Continuous Emissions Monitoring System (CEMS).*
 - (1) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or,
 - (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (2) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - (a) A calibrated flowmeter that records data on a continuous basis, if available; or

APPENDIX TV
TITLE V GENERAL CONDITIONS
(Version Dated 02/16/2012)

- (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (3) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- c. *Mass Balance Calculations.*
 - (1) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - (a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and,
 - (b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (2) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (3) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- d. *Emission Factors.*
 - (1) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - (a) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (b) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - (c) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - (2) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- e. *Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of

APPENDIX TV
TITLE V GENERAL CONDITIONS
(Version Dated 02/16/2012)

missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

- f. *Accounting for Emissions During Periods of Startup and Shutdown.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- g. *Fugitive Emissions.* In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- h. *Recordkeeping.* The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(1) & (2), F.A.C.]

Responsible Official

TV32. Designation and Update. The permittee shall designate and update a responsible official as required by Rule 62-213.202, F.A.C.

Prohibitions and Restrictions

TV33. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

TV34. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Chapter 62-281, F.A.C.

TV35. Open Burning Prohibited. Open burning is prohibited unless performed in accordance with the provisions of Rule 62-296.320(3) or Chapter 62-256, F.A.C.

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.b.**, 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. Commencing from the effective date of this permit, 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 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. 03900005-014-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.
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<u>C. Control Technology:</u>	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.
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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
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.
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C. <u>Control Technology:</u>	Venturi Scrubber
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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**

**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. <u>Control Technology:</u>	Venturi Scrubber
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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**

**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.
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C. <u>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**

**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. <u>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**

**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.
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C. <u>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**

**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.



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 1414 901" style="list-style-type: none"><li data-bbox="424 609 1414 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 1414 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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Table 1 to Subpart OOO—Exceptions to Applicability of Subpart A to Subpart OOO

Subpart A reference	Applies to subpart OOO	Explanation
60.4, Address	Yes	Except in §60.4(a) and (b) submittals need not be submitted to both the EPA Region and delegated State authority (§60.676(k)).
60.7, Notification and recordkeeping	Yes	Except in (a)(1) notification of the date construction or reconstruction commenced (§60.676(h)). Also, except in (a)(6) performance tests involving only Method 9 (40 CFR part 60, Appendix A–4) require a 7-day advance notification instead of 30 days (§60.675(g)).
60.8, Performance tests	Yes	Except in (d) performance tests involving only Method 9 (40 CFR part 60, Appendix A–4) require a 7-day advance notification instead of 30 days (§60.675(g)).
60.11, Compliance with standards and maintenance requirements	Yes	Except in (b) under certain conditions (§§60.675(c)), Method 9 (40 CFR part 60, Appendix A–4) observation is reduced from 3 hours to 30 minutes for fugitive emissions.
60.18, General control device	No	Flares will not be used to comply with the emission limits.