Georgia-Pacific Corporation Hosford OSB Plant
Compliance Assurance Monitoring Plan

Applicability

In order for the CAM Rule to apply to a specific emission unit/pollutant, the following, four criteria must be met:

1) The emission unit must be located at a major source for which a Part 70 or Part 71 permit is required.

2) The emission unit must be subject to an emission limitation or standard.

3) The emission unit must use a control device to achieve compliance.

4) The emission unit must have potential, pre-controlled emissions of the pollutant of at least 100 percent of the major source threshold.

Table 1 summarizes the potential uncontrolled and controlled emissions for each of the emission units at the Hosford OSB Plant that use a control device.

Table 1. Hosford OSB Plant Source with Control Equipment - Uncontrolled and Controlled Emission Levels (tons per year)

Emission	Emission Point	Process or Control	TSP		PM_{10}		VOC		HAPs	
Source	Number	Device	Pre	Post	Pre	Post	Pre	Post	Pre	Post
Five Flake Dryers & Thermal Oil Heater	EU-001	2- RTO	>100	187	>100	187.0	>100	349.1	HCHO; 140.53	14.05
Panel Press	EU-002	TCO	36 per ap42	15.77	36 per ap42	15.77	>100	55.3	Methanol =150; Ap42	14.34
Screen Fines	EU 003	Baghouse Receiver	11.62	CAM not required	11.62		–	–	–	–
Saw Trim	EU 004	Baghouse Receiver	5.89	CAM not required	5.89					
Mat reject	EU 005	Baghouse Receiver	10.01	CAM not required	10.01					
Specialty Saw	EU 006	Baghouse Receiver	9.87	CAM not required	9.87					
Fuel System pneum	EU 007	Baghouse Receiver	1.87	CAM not required	1.87					
Forming Bins	EU 008	Baghouse Receiver	8.61	CAM not required	8.61					
Hammermill System	EU009	Baghouse Receiver	11.6	CAM not required	11.6					

Thermal Oil Heater-Wood fired exhaust to Dryer and RTO	EU 011	ESP/RTO	>100	35	>100	35				
Thermal Oil Heater –Gas Fired	No Control	CAM Not Required								
Major Source Threshold			100.0		100.0		100.0		25.0	

Notes: RTO = Regenerative thermal oxidizer
ESP = Electrostatic precipitator
TCO= Thermal Catalytic Oxidizer; System can operate in the catalytic mode (<1200 F) or regenerative mode (>1500 F).
Pre = Pre-controlled emissions
Post = Post-controlled emissions
Baghouses – Pre-control Emissions are based on 99.9% control directed through a receiver baghouse
Veneer Dryers (RTO) – Pre-control PM emissions reflect AP-42 emission factors for uncontrolled dryers. Post-control emissions are based on permit limits.
Veneer Dryers (RTO)Pre-control HAPs and VOCs are based on AP42. Post-control emissions are based on Permit Limits.

Baghouses are inherent to the process and therefore exempt from CAM requirements.

The following emission units/pollutants will be subject to CAM as part of this Part 70 permit renewal:

Five Flake Dryers with two regenerative thermal oxidizer (RTO) –
PM, PM10, Volatile organic compounds (VOCs)

Panel Press with TCO; VOC

Screen Fines, Saw Trim, Mat Reject, Specialty Saw, Fuel System pneumatic system, Forming bins, and Hammermill system and their respective Baghouses-
Inherent process equipment; CAM does not apply.

Thermal Oil Heater with ESP exhausting through dryer RTO; PM

All other controlled emission units have potential, pre-control emissions that are less than the major source threshold. Thus, CAM will not be applicable to these units.

Components of CAM Plan

The CAM Rule contains the following submittal requirements:

40 CFR 64.4(a)	Information on indicators, including indicator ranges or a description of the process by which indicators are to be established and a discussion of performance criteria for the monitoring
40 CFR 64.4(b)	Justification for the proposed elements of the monitoring
40 CFR 64.4(c)	Control device operating data recorded during performance test, supplemented by engineering assessments or manufacturer's recommendations to justify the proposed indicator range
40 CFR 64.4(d)	Test plan and schedule for obtaining data, if performance test data are not available. -NOT APPLICABLE.
40 CFR 64.4(e)	Implementation plan, if monitoring requires installation, test or other activities prior to implementation. -NOT APPLICABLE

The following sections address these requirements for the Flake Dryers, Presses, and Thermal Oil fired with wood and controlled by the RTO.

CAM FOR VOC's , PM and CO FROM THE FIVE FLAKE DRYERS/3 RTO'S (EU 001) and Thermal Oil Heater (EU011)

A. Monitoring Approach (40 CFR 64.4(a))

1. Compliance Control Parameters

Georgia-Pacific Corporation (G-P) proposes to monitor two key parameters to show compliance with the limitations on VOC's, CO, and PM/PM10. The permit requires a VOC limit of 79.7 lbs/hour, a CO limit of 42.4 lbs/hr, and a PM limit of 42.7 lbs/hour on a 3 hour rolling average basis. In order to prove continuous compliance with these requirements, G-P determined the best parameters to monitor are RTO retention chamber temperature and the isolation damper position. The parameters are controlled, monitored, and recorded continuously at the RTO Control Center.

VOC, CO, and PM/PM10 emissions are destroyed based on a minimum operating temperature in the RTO of at least 1492 degrees Fahrenheit (°F) with the dampers open. Based on testing at Hosford in August 2005, G-P determined that temperatures down to 1492 degrees Fahrenheit (°F) resulted in VOC emissions of 4.35 lb/hrs, CO emissions at 10.37 lb/hr, and PM/PM10 at 9.53 lbs/hr. All emissions' results from the test were well under their permitted limits. Therefore, we propose that operations below that level indicate a requirement to further investigate the cause of the excursion.

2. Operational Status Indicators

Operational status of the RTO, the temperature gauges, and the damper positions are constantly monitored by the dryer operator. A parametric monitoring report is printed and reviewed weekly for the operating conditions of the RTO, including the temperature, and damper position.
The RTO control system features visual and audible alarms to the operator of a malfunction in RTO operations. These alarms remain active until the proper corrective action is taken. If deficiencies in the performance of the parametric monitoring system occur, corrective action(s) will be taken.

Any time the temperature indicators read below 1492°F, the RTO operations are checked for excursions.

If there is any type of problem with any of the two RTO's, the Isolation Dampers for the problem RTO will close off the RTO, re-route the air to the other RTO and shut down a dryer. A closed damper is an indicator to investigate an issue with the RTO.

3. Monitoring Location and Averaging Period

The RTO chamber temperature is based on the average reading of thermocouples located in the retention chamber. The continuous readings are recorded and documented every 15 minutes. A rolling 12 hour average is also documented.

The damper positions are also monitored continuously for their open position.

The temperature and damper positions are continuously monitored by the dryer operator at their work station.

4. Recording and Recordkeeping

The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators discussed previously. Recordkeeping and reporting of these parameters is managed using a relational database (such as Wonderware's Industrial SQL Server Software). The unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.

5. Testing and Implementation Schedule

Testing was completed in August/ September 2005 and again in May 2006. G-P proposes testing once every five years prior to each Title V permit renewal.

6. Quality Assurance/Quality Control

The Operator will print a monitoring report every week and check the data for completeness, legibility, reasonableness, and accuracy.

G-P will check the calibration of the temperature and damper operations according to the manufacturer's instructions at least annually.

G-P has developed and implemented a maintenance schedule which includes monthly, quarterly, semi-annual and annual maintenance activities recommended by the equipment manufacturer and/or determined by Georgia-Pacific to be necessary. The maintenance tasks will assure that the RTO and data acquisition systems are being maintained as per the manufacturer's recommendations, which have been developed to enhance the reliability of the equipment and minimize the possibility of malfunction of the systems due to a preventable failure.

The RTO visual and audible alarms are checked on an annual basis by manually verifying the alarm will be triggered during a controlled malfunction event. This will be conducted during annual maintenance on the RTO prior to the dryer starting back up. The temperature thermocouples will be replaced or calibrated annually and certified by the supplier to be accurate within +/- 0.75% per the ASTM E230 Standard at the design temperature of 1500 F.

I.	Indicator	1.Temperature of RTO retention chamber 2. Isolation Damper position
	Measurement Approach	1. Measure each RTO chamber temperature using eight thermocouples located in each retention chamber. A 12 hour rolling average of all the thermocouples shall be documented every 15 minutes. 2. Monitor damper position as open or closed
II.	Indicator Range	1. Any 12 hour rolling average reading for all of the RTO thermocouples **below 1492°F** is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary. 2. Any damper closed for more than one hour is an excursion.
III.	Performance Criteria A. Data Representativeness	The data for determining the minimum operating temperature was developed from the onsite stack tests taken in August 2005 and May 2006
	B. Verification of Operational Status	1. Operational status of the RTO, the temperature gauges, and the isolation dampers are monitored each shift by the dryer operator. A parametric monitoring report is printed and reviewed twice each week that summarizes the operating conditions of the RTO including the temperature and damper position. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO. A visual alarm is triggered when a damper is closed.
	C. QA/QC Practices and Criteria	1. Weekly printed report review. 2. Calibrate the temperature thermocouple sensors annually. Annually, the thermocouples will be calibrated and certified by the company who performs the calibration to verify that the readings are within a +/- 0.75% level of accuracy according to the standard established in ASTM E230. 3. Calibrate the damper location by visual check and documentation on a monthly basis. 4. Maintenance schedule of monthly, quarterly and annual activities. 5. Audible and visual alarms are checked annually during annual maintenance down periods.
	D. Monitoring Frequency	Temperature and damper position are measured continuously, averaged and recorded every 15 minutes with a rolling average generated for each 12- hour period.
	E. Data Collection Procedures	The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators discussed previously. Record keeping and reporting of the parameters are managed using a dedicated computer equipped with a relational database . Additionally, the unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.
	F. Averaging period	Temperature readings are documented every 15 minutes, from data collected every 10 seconds. The data is then averaged over a rolling 12 hour period. The 12 hour rolling average is the value used to verify the RTO is operating above a minimum of 1492 degrees F. Damper position is measured continuously.

B. DRYER RTO MONITORING APPROACH JUSTIFICATION (40 CFR 64.4(b))

1. Background

The emissions unit (EU) consists of the five flake dryers. The dryers operate continuously when the plant is in normal operation. Airflow is ducted from five dryers to a pressure equalization chamber and then to two RTO's. There are isolation dampers between the pressure equalization chamber and each RTO that are normally open during operation. VOC's, CO, and PM are burned in the retention chambers then the exhaust gases are vented to the atmosphere.

2. Rationale for Selection of Performance Indicators

An RTO is used to reduce VOC, CO and PM/PM10 emissions from the manufacturing process. Emissions from five dryers are ducted to two RTO's. The wood flake drying process is a continuous operation, but the production rate may vary slightly with the type of product produced. The fraction of VOCs, PM/PM10, and CO that combusts increases with rising temperature. To comply with the applicable emission limits, a minimum average retention chamber temperature of 1492F must be maintained.

3. Rationale for Selection of Indicator Range

The values for the performance indicator were based on recommendations by the RTO vendor and stack tests done on the RTO in August/September 2005. The lowest temperature value documented during the test was 1492 F. Pollutant destruction increases with increasing retention chamber temperature, so a maximum temperature limit is not necessary.

Damper position was chosen as an indicator because it indicates the RTO's are receiving the exhaust from the dryers, there are no bypasses, and that the RTO's are operational and functioning correctly. There is a damper for each RTO. When a damper closes for an individual RTO, the RTO shuts down, the dryer exhaust air is routed to the other RTO, and still being treated, but it does indicate an issue with the RTO. It also automatically shuts down dryers depending on the number of RTO chambers that are down.

CONTROL DEVICE OPERATING DATA RECORDED DURING PERFORMANCE TEST (40 CFR 64.4(c))

Lowest temperature reading during the 2005 test was 1492F. The emissions below given are slightly different than what was submitted in the previous CAM plan because we had not received the final report from the stack testing company and had used their draft results.

Summary of both RTO's :

CO= 10.37 lb/hr;	previously reported value was 10.29 lb/hr
PM=9.53 lb/hr	previously reported value was 10.9 lb/hr
VOC= 4.35 lb/hr	previously reported value was 4.75 lb/hr

Dampers were open during the test in 2005 and during the May 2006 test.

CAM FOR VOC's and PM FROM THE PRESS/TCO (EU 002)

A. Monitoring Approach (40 CFR 64.4(a))

1. Compliance Control Parameter

In order to prove continuous compliance with the VOC (12.6 lb/hr) and PM (3.6 lb/hr) G-P proposes to monitor TCO retention chamber temperature. The retention chamber temperature will be set, monitored, and recorded continuously at the TCO Control Center.

VOC emissions are destroyed based on setting the minimum operating temperature in the TCO of at 800 degrees Fahrenheit (°F). Based on compliance testing in 2005 at the Hosford OSB facility, with the set point at 800 °F, the VOC emission rate was 1.22 lb/hr and the PM emission rate was 0.83 lb/hr, well below the limits.

2. Operational Status Indicators

The TCO control system features audible and visual alarms to alert personnel of a malfunction in TCO operations. These alarms remain active until the proper corrective action is taken. If deficiencies in the performance of the parametric monitoring system occur, corrective action(s) will be taken.

3. Monitoring Location and Averaging Period

The TCO chamber temperature is based on the average reading of 4 thermocouples located in the retention chamber – one between canisters. The continuous readings are recorded every 15 minutes and a 12 hour rolling average calculated with that information.

4. Recording and Recordkeeping

The TCO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators

discussed previously. Recordkeeping and reporting of these parameters is managed using a dedicated computer equipped with a relational database (such as Wonderware's Industrial SQL Server Software). The unit is equipped with a chart recorder that continuously records the temperature as a back-up in the event of upset or failure of the monitoring computer database.

5. Testing and Implementation Schedule

The facility conducted its first compliance test on September 1, 2005, since completing construction in May 2005 and again in May 2006. G-P proposes testing once every five years prior to each Title V permit renewal.

6. Quality Assurance/Quality Control

The operator(s) will use TV monitors to monitor the TCO temperature and operational status indicators 24-hours per day. In addition, the facility Environmental Manager will print a monitoring report every week and check the data for completeness, legibility, reasonableness, and accuracy.

G-P has developed and implemented a maintenance schedule which includes monthly, quarterly, semi-annual and annual maintenance activities recommended by the equipment manufacturer and/or determined by Georgia-Pacific to be necessary. The maintenance tasks will assure that the TCO and data acquisition systems are being maintained as per the manufacturer's recommendations, which have been developed to enhance the reliability of the equipment and minimize the possibility of malfunction of the systems due to a preventable failure.

The TCO audible and visual alarms are checked on an annual basis by manually verifying the alarms will be triggered during a controlled malfunction event. This will be conducted during annual maintenance on the TCO prior to the press starting back up. The temperature thermocouples will be replaced or calibrated annually and certified by the supplier to be accurate within +/- 0.75% per the ASTM E230 Standard at the design temperature of 800 F.

I.	Indicator	1. Temperature of TCO retention chamber
	Measurement Approach	2. Measure the TCO retention chamber temperature using four thermocouples located in the retention chamber. A 12 hour rolling average of all the thermocouples shall be documented every 15 minutes.
II.	Indicator Range	2. Any 12 hour rolling average reading, for the average of the TCO thermocouples, below 800°F is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary.
III.	Performance Criteria A. Data Representativeness	The data for determining the operating ranges was developed from onsite stack tests taken in the last compliance test.
	B. Verification of Operational Status	1. A parametric monitoring report is printed and reviewed once each week that summarizes the operating conditions of the TCO including the temperature. 2. Visual and audible alarms are triggered when there is a malfunction with the TCO.
	C. QA/QC Practices and Criteria	1. Weekly printed report review. 2. Annually, the thermocouples will be calibrated and certified by the company who performs the calibration to verify that the readings are within a +/- 0.75% level of accuracy according to the standard established in ASTM E230. 3. Maintenance schedule of daily, weekly, monthly, quarterly and annual activities. 4. Visual and audible alarms are checked annually during annual maintenance down periods.
	D. Monitoring Frequency	Temperature is measured continuously (*i.e.*, every 10 seconds), averaged and a 12 hour rolling average recorded every 15 minutes.
	E. Data Collection Procedures	The TCO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters and operational status indicators discussed previously. Record keeping and reporting of the parameters are managed using a relational database (such as Wonderware's Industrial SQL Server Software). Additionally, the unit is equipped with a chart recorder that continuously records the temperature and airflow as a back-up in the event of upset or failure of the monitoring computer database.
	F. Averaging period	Temperature readings are documented every 15 minutes, from data collected every 10 seconds. The data is then averaged over a rolling 12- hour period. The rolling 12 hour average is the value used to verify that there has not been an excursion below the minimum operational temperature of 800 F.

B. PRESS TCO MONITORING APPROACH JUSTIFICATION (40 CFR 64.4(b))

1. Background

The emissions unit (EU) consists of one 16-openings hot press. The process consists of a forming line, loader, press and unloader, pressure equalization chamber, TCO, and related duct work. The press operates continuously when the plant is in normal operation, except for routine maintenance and cleaning. The press is equipped with a partial enclosure. Airflow is ducted from the partial enclosure to a pressure equalization chamber and then to the TCO. VOC compounds and PM are burned in a retention chamber then the exhaust gases are vented to the atmosphere.

2. Rationale for Selection of Performance Indicators

The TCO is used to reduce VOC and PM/PM10 emissions from the hot press. Emissions from the hot press are ducted to the TCO. To comply with the applicable emission limit, the retention chamber temperature set point of 800F is established per the vendor recommendations.

3. Rationale for Selection of Indicator Ranges

The values for the performance indicator were based on recommendations by the RTO vendor and stack tests done on the TCO. Destruction/removal efficiency (DRE) increases with increasing retention chamber temperature, so a maximum temperature limit is not necessary.

C. CONTROL DEVICE OPERATING DATA RECORDED DURING PERFORMANCE TEST (40 CFR 64.4(c))

Based on compliance testing in 2005 at the Hosford OSB facility, with the set point at 800 °F, the VOC emission rate was 1.22 lb/hr and the PM emission rate was 0.83 lb/hr, well below the limits. Retention chamber was again recorded during the May 2006 test. For this test, the temperature set point was 900 F and the lowest temperature reading during the test was 897 F.

Summary of the compliance test performed on May 12, 2006 will be submitted under separate cover.

CAM FOR PM FROM THE THERMAL OIL HEATER-WOOD FIRED OPERATION WITH ESP (EU 011)

A. Monitoring Approach (40 CFR 64.4(a)): This CAM only applies when the Thermal Oil Heater (TOH) is fueled by wood, and exhausts through the dryer and the dryer RTO's. When the TOH is fueled by natural gas, a CAM plan is not required.

1. Compliance Control Parameters

Georgia-Pacific Corporation (G-P) proposes to monitor two key parameters to show compliance with the limitations on PM/PM10. The permit requires a Visual Emissions (VE) limit of 10% when firing wood and bypassing while switching to natural gas. The parameter would be checked once per day for one minute during the process of switching to natural gas and only those days that the switch of fuels occurs. Normal and routine operation of the TOH is to route the combustion gases through the dry ESP and then through the dryers/RTOs system. As stated in the PSD Construction Permit, "Because emissions are routed to the dryer system while wood fuel is fired….compliance with the dryer system limits will ensure compliance with this (Visible Emissions) rule." Therefore the best second parameter to monitor is to ensure it is routing through the dryer. The second parameter would be to monitor the isolation dampers between the two TOH's and the dryer and its RTO.

2. Operational Status Indicators

Operational status of the TOH and ESP would be checked on a daily basis when aborting through the ESP. If there are any emissions over 10% corrective action(s) will be taken. When the air exhausts through the dryer, the isolation dampers between the ESP and the dryers are monitored to verify they are open.

3. Monitoring Location and Averaging Period

The TOH ESP will be monitored once per day on the days that the fuel is switching from wood to natural gas and the Visible Emissions checked for a one minute period for those periods that the fuel is switching from wood to gas. VE readings will be taken over a one minute period. The isolation dampers are monitored continuously by the PLC.

4. Recording and Recordkeeping

The inspector for the operation will keep a record of the visible emissions readings and the date, when the TOH is aborting through the ESP while on gas. The PLC operations software documents the isolation damper location.

5. Testing and Implementation Schedule

Method 9 testing has been completed. Test results are being submitted under separate cover.

6. Quality Assurance/Quality Control

The inspector and a backup person will be trained to read the Visible Emissions at least once per year.

I.	Indicator	1.Visible Emissions
	Measurement Approach	1. One visible emission reading every 15 fifteen seconds for one minute.
II.	Indicator Range	1. A VE reading of 5% opacity or more, will be the trigger level at which the emissions will be investigated.
III.	Performance Criteria A. Data Representativeness	Emissions are minimal. The visible emissions will be tested when the ESP is operated with wood fuel and during the transition period to natural gas, is exhausting through the ESP. (ie is aborting from the dryer and RTO). The isolation damper allows the exhaust to route to the Dryer and its RTO. This is monitored continuously.
	B. Verification of Operational Status	1. Operational status of the ESP emissions to atmosphere will be checked for a one minute period when aborting from the dryer and switching to natural gas. 2. The isolation damper positions are monitored continuously and checked visually each day.
	C. QA/QC Practices and Criteria	The Visible Emissions inspector will be trained at least once per year to read 10%. The isolation damper operation will be checked visually against the PLC monitor once per month to verify the damper location matches the PLC monitor reading.
	D. Monitoring Frequency	Once during the transition from wood to natural gas, a visual emissions reading will be taken every 15 seconds for one minute. The isolation damper position will be checked once per day; the damper position is monitored continuously.
	E. Data Collection Procedures	Record of the inspection will be kept.
	F. Averaging period	Visible emissions will be taken for one minute. Damper position is an instantaneous reading.

B. DRYER RTO MONITORING APPROACH JUSTIFICATION (40 CFR 64.4(b))

2. Background

The emissions unit (EU) consists of the Thermal Oil Heater and ESP. The TOH alternate scenario is to be fueled by gas and exhaust to the atmosphere. PM is controlled by the two cells of the ESP and then the exhaust gases are vented to the dryer. The isolation dampers are opened to allow the exhaust to the dryer and RTOs.

2. Rationale for Selection of Performance Indicators

The State has given the ESP a limit of Visible Emissions = 10% when fired by wood fuel.

3. Rationale for Selection of Indicator Range

The CAM rules requires monitoring once per day when the post control emissions of the unit are less than 100 tpy for PM.

To comply with the applicable emission limits, the only level that is readable is 5%. Therefore, that will be the level which would trigger action to investigate if there is a problem or maintenance is needed.

CI. CONTROL DEVICE OPERATING DATA RECORDED DURING PERFORMANCE TEST (40 CFR 64.4(c))

Tests were done in May 2006. The tests are forthcoming.

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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)]

<u>40 CFR 64.9 Reporting And Recordkeeping Requirements.</u>

15. <u>General reporting requirements.</u>

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. <u>General recordkeeping requirements.</u>

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)]

<u>40 CFR 64.10 Savings Provisions.</u>

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]