EU 001	
I. Indicator	1. Temperature of RTO retention chamber 2. Isolation Damper
Measurement Approach	1. Measure each RTO chamber temperature using a sufficient number of thermocouples to provide reasonable assurance that the temperature is representative of the retention chamber average temperature. A 3-hour block average of all the thermocouples shall be documented every 15 minutes. 2. Monitor isolation damper position as open or closed
II. Indicator Range	1. Any 3-hour block average minimum firebox (retention chamber) temperature reading at or below the minimum temperature established in accordance with the requirements of 40 CFR 63.2262(k) is an excursion. This will prompt the operator to determine and document the cause and any corrections if necessary. 2. Any isolation damper closing is investigated. This investigation includes confirming the operating status of the dryers, stopping dryer feed, and any other necessary corrective actions.
III. Performance Criteria	
A. Data Representativeness	The data for determining the operating range will be developed based on the performance test(s) and the procedures described in 40 CFR 63.2260 through 63.2269, at which the RTO could operate at and maintain compliance.
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 reviewed twice each week that summarizes the operating conditions of the RTO including the temperature and isolation damper position. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO. A visual alarm is triggered when an isolation damper closes.
C. QA/QC Practices and Criteria (40 CFR 63.2269(b))	1. Weekly report review. 2. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 F of the process temperature sensor's reading. 3. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating range or install a new temperature sensor. 4. Maintenance schedule of monthly, quarterly and annual activities. 5. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. 6. For isolation dampers, monthly checks are done to confirm that the limit (proximity) switches are responding properly to damper position (i.e., confirming dampers in the fully open or fully closed position as appropriate).

D. Monitoring Frequency	Temperature is measured continuously, recorded every 15 minutes with a block average determined for each 3-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 (temperature) and operational status indicators (isolation damper). Record keeping and reporting of the parameters are managed using a data acquisition system. 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	1. Temperature readings are documented every 15 minutes. The data is then averaged over a block 3-hour period. The 3-hour block average is the value used to verify compliance with the minimum firebox temperature established in accordance with the requirements of 40 CFR 63.2262(k). 2. Isolation Damper position is monitored continuously.

EU 002	
I. Indicator	1. Temperature of RTO/TCO/RCO retention chamber
Measurement Approach	1. Measure the RTO/TCO/RCO chamber temperature using a sufficient number of thermocouples to provide reasonable assurance that the temperature is representative of the retention chamber average temperature. A 3-hour block average of all the thermocouples shall be documented every 15 minutes.
II. Indicator Range	1. Any 3-hour block average minimum firebox (retention chamber) temperature reading at or below the minimum temperature established in accordance with the requirements of 40 CFR 63.2262(k) or (l) 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 range will be developed based on the performance test(s) and the procedures described in 40 CFR 63.2260 through 63.2269, at which the RTO/TCO/RCO could operate at and maintain compliance.
B. Verification of Operational Status	1. A parametric monitoring report is reviewed twice each week that summarizes the operating conditions of the RTO/TCO/RCO including the temperature. 2. Visual and audible alarms are triggered when there is a malfunction with the RTO/TCO/RCO.
C. Quality Assurance and Control Practices (40 CFR 63.2269(b), 63.2282(e), and Table 2 to 40 CFR 63 subpart DDDD	1. Weekly report review. 2. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 F of the process temperature sensor's reading. 3. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating range or install a new temperature sensor. 4. Maintenance schedule of monthly, quarterly and annual activities. 5. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. 6. Check the activity level of a representative sample of the catalyst at least every 12 months.
D. Monitoring Frequency	Temperature is measured continuously, recorded at least every 15 minutes, with a block average determined for each 3-hour period.

E. Data Collection Procedures	The RTO/TCO/RCO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control parameters (temperature) and operational status indicators (isolation damper). Record keeping and reporting of the parameters are managed using a data acquisition system. 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. The data is then averaged over a block 3-hour period. The 3- hour block average is the value used to verify compliance with the minimum firebox temperature established in accordance with the requirements of 40 CFR 63.2262(k) or (l).

	EU 011	
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 the first time the ESP is operated with wood fuel and is exhausting through the ESP. (i.e., is aborting from the dryer and RTO). The isolation damper allows the exhaust to rout 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 daily when aborting from the dryer. 2. The isolation damper positions are monitored continuously and checked visually each month.
	C. QA/QC Practices and Criteria	The Visible Emissions inspector will be trained at least once per year to read visible emissions. The isolation damper operation will be checked visually against the PLC monitor once per month to verify the damper position 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.