ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☐ YES ☒ NO**

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit: **Not Applicable**

☐ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

****Rationale for CAM Exemption:** The Polymer Additives manufacturing unit does not own or operate a subject pollutant-specific emissions unit as defined at 40 C.F.R. §64.1, because all Polymer Additives manufacturing unit control devices either have potential pre-control device annual emissions of applicable regulated air pollutants that are less than major source levels, and thus are exempt per 40 C.F.R. §64.2(a)(3), or are already subject to a Title V permit that specifies a continuous compliance determination method as defined in §64.1, and thus are exempt from CAM requirements per 40 C.F.R. §64.2(b)(1)(vi), or are subject to an exempt emission limitation or standard for the applicable regulated air pollutant proposed after 11/15/1990 (40 CFR Part 63 Subpart FFFF), and thus are exempt from CAM requirements per 40 C.F.R. §64.2(b)(1)(i). Note that vapor return lines are a passive control measure, and therefore are not a control device as defined in the CAM Rule per 40 C.F.R. §64.1.

3) [a] BACKGROUND DATA AND INFORMATION

Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
Not Applicable					
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

4a) PSEU Designation: **Not Applicable**	**4b) Pollutant:**	**4c) [a] Indicator No. 1:**	**4d) [a] Indicator No. 2:**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:			
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:			
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:			
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):			
[d] Provide the MONITORING FREQUENCY:			
Provide the DATA COLLECTION PROCEDURES that will be used:			
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:
Not Applicable	

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION: