|  |  |
| --- | --- |
| Minnesota Pollution Control Agency (MPCA), 520 Lafayette Road North, St. Paul, MN 55155-4194 | MG-09H  Part 70 Manufacturing General Permit  Requirements: Compliance Assurance Monitoring  (40 CFR § 64)  Air Quality Permit Program  *Doc Type: Permit Application* |

**Refer to the *Handbook and application instructions* for the Part 70 Manufacturing General Permit for form instructions.**

## **Facility information**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **a)** AQ Facility ID number: | |  | **b)** Agency Interest ID number: |  |
| **c)** Facility name: |  | | | |

## **Applicable requirement determination**

The Compliance Assurance Monitoring (CAM) rule applies to certain emission units at facilities required to obtain a Part 70 permit.

In general, CAM applies to emission units meeting the following criteria:

1. The emission unit is subject to an emission limit or standard (including limits and standards in Minnesota Rules contained in the State Implementation Plan) for an air pollutant regulated by Part 70;

2. Compliance with the applicable limit or standard is achieved through the use of add-on control equipment; and

3. The emission unit has pre-controlled potential emissions of the applicable regulated air pollutant that are equal to or greater than 100% of the Part 70 major source level for that pollutant (in tons per year).

For exemptions, see Table H-3.

Use of continuous emissions monitoring system (CEMS), continuous opacity monitoring system (COMS), or predictive emission monitoring system (PEMS) **does not qualify as an exemption to the CAM rule**. However, 40 CFR § 64.3(d) states that use of a CEMS, COMS, or PEMS **meets the requirements of CAM**.

CAM applicability is determined on a pollutant-by-pollutant basis for each “pollutant specific emissions unit” (**PSEU**), defined at 40 CFR § 64.1 as “an emissions unit considered separately with respect to each regulated air pollutant.”

* For purposes of CAM submittal requirements, a “**Large PSEU**” is an emissions unit with potential *controlled* emissions equal to or greater than 100% of the major source threshold amount for a given regulated pollutant.
  + “Major source threshold amount” means **100 tons per year** of particulate matter smaller than ten microns in aerodynamic diameter (PM10), sulfur dioxide, nitrogen oxides, volatile organic compounds (VOC), carbon monoxide, or lead; **10 tons per year** of any hazardous air pollutant (HAP); or **25 tons per year** of any combination of HAPs.
  + The levels may be different in current or future nonattainment areas. Refer to 40 CFR § 70.2 under the definition of “major source” for further detail.
* “**Other PSEUs**” are those units whose uncontrolled potential emissions may be equal to or greater than 100% of the major source threshold amount, but controlled emissions are less than that threshold.

If you are applying for the first time for a Part 70 permit, after determining the uncontrolled and controlled potential emissions of the emissions units, answer question 1a, then consider questions 2 and 3 for each **large** pollutant specific emissions unit, as defined above. If you are applying for a renewal of an existing Part 70 permit, answer question 1b, then proceed as directed.

**1a)** If you are applying for the first time for a Part 70 permit, do you have Large PSEUs, as defined above?

Yes, go to question 2

No, I am applying for the first time for a Part 70 permit and my facility has no Large PSEUs. Done with this form.

Not Applicable – I already have a Part 70 permit. Go to question 1b.

**1b)** If you are permitted under the most recent Part 70 Manufacturing General Permit or Low-Emitting Facility (LEF) General Permit (you are applying for renewal of an existing Part 70 permit), check the appropriate box below:

CAM applicability has already been determined for all Large PSEUs and all Other PSEUs, and there have been no changes affecting CAM applicability since the most recent Minnesota Pollution Control Agency-approved General Permit CAM Plan. Check the box(es) next to the CAM Plan(s) below that applies to units at your facility and submit this form.

CAM applicability has been determined for some but not all PSEUs at the facility. **Or** CAM applicability has changed since the most recent determination. After determining the uncontrolled and controlled potential emissions of the emissions units, the following questions must be considered for ***each pollutant specific emissions unit*** **(large and other)** for which CAM applicability must be determined. Check the box(es) next to the CAM Plan(s) below that applies to units at your facility.

**Note**: Because CAM applies only to units that are controlled by add-on control equipment or practices, the following questions need to be answered, and Tables H-1 and H-2 completed, only for units which are controlled by add-on control technologies. **Uncontrolled units may be ignored under the CAM requirements.**

**2)** Is the unit subject to an emission limitation or standard, specified in either a rule or permit, for the pollutant(s) controlled by the add-on control technologies? For existing emission units included in an existing permit, check your current permit to see if there are any emission limits specified for the emission unit.

Yes, the emission unit is subject to an emission limitation or standard. Go on to question 3.

No, the emission unit is not subject to CAM. Record the EQUI ID number (from Form MG-05B) and reason CAM doesn’t apply (no applicable emission limitation or standard) in Table H-2. Repeat question 2 for next emission unit.

**3)** There are some exemptions allowed by the rule. Review the list of exemptions in Table H-3, then check the applicable box below and follow the instructions provided.

The emission unit(s) does/do not fall under any of the exemptions in Table H-3 and is therefore subject to CAM. List the emission unit in Table H-1 and repeat questions 2 and 3 for the next emissions unit that is controlled by an add-on control technology. When each emission unit has been considered, go on to complete the rest of Table H-1 and Table H-2, and submit this form with box(es) checked next to the applicable CAM Plan(s) below.

The emission unit(s) is/are exempt from CAM under one of the exemptions listed in Table H-3. List the emission unit(s) in Table H-2 and specify the applicable exemption. Repeat questions 2 and 3 for the next emissions unit that is controlled by an add-on control technology. When each emission unit has been considered, go on to complete the rest of Tables H-1 and H-2.

## **Table H-1. Controlled emission units subject to CAM**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **EQUI ID number** | **Emission unit description** | **TREA ID number** | **Description of control equipment** | **Pollutant(s) which are subject to CAM** |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

## **Table H-2. Controlled emission units not subject to CAM**

|  |  |  |
| --- | --- | --- |
| **EQUI ID number** | **Emission unit description** | **Reason not subject to CAM** |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

***(Duplicate this page as needed to complete Tables H-1 and H-2.)***

## **Table H-3. CAM rule exemptions**

|  |
| --- |
| **For additional information, please refer to the CAM Rule at 40 CFR § 64.**  **Additional information, including a Technical Guidance Document that includes examples, is available on the U. S. Environmental Protection Agency (EPA) website at** [**https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring**](https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring)**.**  **The CAM rule does not apply to the following emissions limitations or standards:** |
| * Units subject to emission limitations or standards proposed by EPA after November 15, 1990, pursuant to section 111 or 112 of the Clean Air Act. In situations where some portions of a facility operate control devices in order to comply with emission standards issued prior to November 15, 1990, only those portions of the facility must comply with the requirements of the CAM rule. |
| * Situations where continuous compliance monitoring is already specified in an operating permit. The CAM rule exempts the Permittee from additional monitoring requirements and directs the Permittee to use the continuous compliance monitoring data to fulfill the CAM rule monitoring and certification requirements.   + While use of continuous emissions monitoring system (CEMS), continuous opacity monitoring system (COMS), or predictive emission monitoring system (PEMS) may meet the requirements of CAM, and may exempt the Permittee *from additional monitoring requirements* beyond the continuous compliance monitoring, the use of a CEMS, COMS, or PEMS **does not qualify as an exemption to the CAM rule**. If you are meeting the requirements of CAM for an emission unit through the use of a CEMS, COMS, or PEMS, that emission unit should be listed in Table H-1. |
| * Stratospheric ozone protection requirements |
| * Acid Rain Program requirements |
| * Emission limitations or standards that apply solely under an emissions trading program |
| * Municipally-owned utility peak-shaving units where * the unit is exempt from all Acid Rain Program monitoring requirements, and * the unit operates for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations, and * the unit will be operated consistent with that purpose throughout the permit term, and * emissions from the unit are less than 50% of the amount required for the source to be classified as a major source, based on an average of the last three years, and are expected to remain so. |

## **CAM Plans**

The next section contains CAM Plans for those units to which CAM may apply under the Part 70 Manufacturing General Permit.

**4)** Check the box(es) next to the CAM Plan(s) below that applies to units at your facility.

**If you have listed units in Table H-1 that are not covered by any of the attached CAM Plans, then you do not qualify for this general permit and must apply for an individual permit.**

CAM Plan for HEPA and Other Wall Filters Controlling Particulate matter (PM) and Particulate matter less than 10 μm in size (PM10) from Spray Booths [Other PSEU]

CAM Plan for Fabric Filters/Baghouses controlling PM and PM10 from Spray Booths [Other PSEU]

CAM Plan for Fabric Filters/Baghouses controlling PM and PM10 from Abrasive Blasting [Other PSEU]

CAM Plan for Catalytic Oxidizers Controlling VOC from Spray Booths, Molding, Casting, Lamination, Mixing or Cleaning [Large PSEU]

CAM Plan for Thermal Oxidizers Controlling VOC from Spray Booths Molding, Casting, Lamination, Mixing or Cleaning & Burn-off Ovens [Large PSEU]

CAM Plan for Catalytic Oxidizer controlling VOC from Spray Booth, Molding, Casting, Lamination, Mixing or Cleaning [Other PSEU]

CAM Plan for Thermal Oxidizer controlling VOC from Spray Booths, Molding, Casting, Lamination, Mixing or Cleaning & Burn-off Oven [Other PSEU]

CAM Plan for wall filters controlling PM and PM10 from spray booths [Other PSEU]

1. **Applicability**
   1. Process/Emission Unit: Spray Booth [Other PSEU]
   2. Control Technology: HEPA and other Wall Filters
   3. Pollutant: Particulate Matter (PM, PM10)

**2. Monitoring approach description**

|  |  |
| --- | --- |
| Indicators monitored | Visually inspect the condition of the filters. |
| Rationale for monitoring approach | If there are any holes, saturation, tears or alignment in the filter, these indicate there is little or no particulate removal. |
| Monitoring methods location | Adhere to the Operation and Maintenance Plan for the filters and take corrective action as soon as possible (within 24 hours of discovery) to eliminate any problem associated with the filters. |
| Analytical devices required | Train staff on the operation and monitoring of the filters and troubleshooting. Also, train and require staff to respond to indications of malfunctioning equipment and, including indicators of abnormal operation. |
| Data Acquisition and Measurement System Operation | Frequency of measurement: Once each operating day, visually inspect the condition of each filter with respect to alignment, saturation, tears, holes, and any other matter that may affect the filter’s performance.  Reporting units: daily check of the condition of the filter.  Recording process: Records are maintained of all inspections and maintenance activities performed. Operators record activities maintenance log sheets, initial and date. |
| Data requirements | The baseline is determined by the facility’s historical records of the condition of the filter with respect to alignment, saturation, tears, holes, and any other matter that may affect the filter’s performance. |
| Quality Assurance/Quality Control (QA/QC) procedures | Operate and maintain each filter in accordance with the Operation and Maintenance Plan and while taking into account the manufacturer’s specifications. |

1. **Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, operation and maintenance [O&M], and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired PM control efficiency.

CAM Plan for fabric filters/baghouses controlling PM and PM10 from spray booths [Other PSEU]

1. **Applicability**
   1. Process/Emission Unit: Spray Booth [Other PSEU]
   2. Control Technology: Fabric Filters
   3. Pollutant: Particulate Matter (PM, PM10)

**2. Monitoring approach description**

|  |  |
| --- | --- |
| Indicators Monitored | Pressure Drop and Visible Emissions (VE) |
| Rationale for Monitoring Approach | Decrease in pressure drop indicative of bag failure;  Increase in pressure drop indicative of fabric blinding or decreased permeability;  A change in VE observations indicates process change, changes in fabric filter’s efficiency, or leaks. |
| Monitoring Methods Location | Measure across the inlet and outlet of each compartment of the fabric filter.  Method 22 (VE) requirements. |
| Analytical Devices Required | Pressure transducers, differential pressure gauges, manometers, other methods and/or alternative instrumentation as appropriate.  Trained observer using visible/no visible emissions observation techniques (Method 22-like) |
| Data Acquisition and Measurement System Operation | Frequency of Measurement: Record pressure drop once every 24 hours when in operation, or recorded continuously on strip chart and daily VE checks as weather permits.  Reporting units: Inches of water column (in w.c) and visible/no visible emissions.  Recording process: Record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified.  If the pressure drop is outside the required operating range and VE emission are observed, the owner or operator will follow the Operation and Maintenance plan for the fabric filter and take corrective action within 24 hours of discovery. Keep a record of the type and date of any corrective action taken for each filter. |
| Data Requirements | The facility’s historical records on pressure drop measurements determine the baseline.  No data are needed for visible emissions. |
| QA/QC Procedures | Calibrate, maintain and operate instrumentation using the procedures that take into account the manufacturer’s recommendations and initial training of observer per RM 22. |

**3. Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, O&M, and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired PM control efficiency. CAM Plan for fabric filters/baghouses controlling PM and PM10 from abrasive blasting [Other PSEU]

**1. Applicability**

* 1. Process/Emission Unit: Abrasive Blasting Booth
  2. Control Technology: Fabric Filters
  3. Pollutant: Particulate Matter (PM, PM10)

**2. Monitoring approach description**

|  |  |
| --- | --- |
| Indicators monitored | Pressure drop and visible emissions (VE) |
| Rationale for monitoring approach | Decrease in pressure drop indicative of bag failure;  Increase in pressure drop indicative of fabric blinding or decreased permeability;  A change in VE observations indicates process change, changes in fabric filter’s efficiency, or leaks. |
| Monitoring methods location | Measure across the inlet and outlet of each compartment of the fabric filter.  Method 22 (VE) requirements. |
| Analytical devices required | Pressure transducers, differential pressure gauges, manometers, other methods and/or alternative instrumentation as appropriate.  Trained observer using visible/no visible emissions observation techniques (Method 22-like) |
| Data acquisition and measurement system operation | Frequency of measurement: Record pressure drop once every 24 hours when in operation, or recorded continuously on strip chart and daily VE checks as weather permits.  Reporting units: Inches of water column (in w.c) and visible/no visible emissions.  Recording process: Record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified.  If the pressure drop is outside the required operating range and VE emission are observed, the owner or operator will follow the Operation and Maintenance plan for the fabric filter and take corrective action within 24 hours of discovery. Keep a record of the type and date of any corrective action taken for each filter. |
| Data requirements | The facility’s historical records on pressure drop measurements determine the baseline.  No data are needed for visible emissions. |
| QA/QC procedures | Calibrate, maintain and operate instrumentation using the procedures that take into account the manufacturer’s recommendations and initial training of observer per RM 22. |

**3. Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, O&M, and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired PM control efficiency.

CAM Plan for catalytic oxidizers controlling VOC from spray booths molding, casting, lamination, mixing or cleaning [Large PSEU]

**1.** **Applicability**

* 1. Process/Emission Unit: Spray Booth, Molding, Casting, Lamination, Mixing or Cleaning
  2. Control Technology: Catalytic Oxidizer
  3. Pollutant: Volatile Organic Compounds (VOCs)

**2. Monitoring approach description**

|  |  |
| --- | --- |
| Indicators monitored | Catalyst bed inlet temperature and catalyst activity. |
| Rationale for monitoring approach | Catalyst bed inlet temperature: Indicates whether the gas flowing into catalyst bed is of sufficient temperature to initiate oxidation.  Catalyst activity: Determines conversion efficiency of catalyst; indicates that catalyst is not poisoned or masked beyond operational range. |
| Monitoring methods location | Catalyst bed inlet and outlet temperature: Preheat chamber outlet and catalyst bed inlet.  Catalyst activity: Sample of catalyst. |
| Analytical devices required | Temperature: Thermocouples, or alternative methods/instrumentation as appropriate for specific gas stream.  Catalyst activity: Qualified laboratory (e.g., catalyst manufactures) for determining activity of catalyst sample. |
| Data acquisition and measurement system operation | Frequency of Measurement: Once every 15 minutes or recorded continuously on strip chart or data acquisition system.  Reporting Units: Degrees Fahrenheit (º F)  Recording process: Operators log data manually, or recorded automatically on strip chart or data acquisition system.  Catalyst activity: Annual analyses of catalyst sample. |
| Data requirements | The facility’s historical records on catalyst bed inlet and outlet temperature measurements.  Catalyst activity: Laboratory results of conversion efficiency. |
| QA/QC procedures | Calibrate, maintain and operate instrumentation using the procedures that take into account the manufacturer’s recommendations and specifications. |

**3. Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, O&M, and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired VOC control efficiency.

CAM Plan for thermal oxidizers controlling VOC from spray booths molding, casting, lamination, mixing or cleaning, and burn-off ovens [Large PSEU]

**1.** **Applicability**

* 1. Process/Emission Unit: Spray Booth, Spray Booths, Molding, Casting, Lamination, Mixing or Cleaning, and Burn-off Oven
  2. Control Technology: Thermal Oxidizer
  3. Pollutant: Volatile Organic Compounds (VOCs)

1. **Monitoring approach description**

|  |  |
| --- | --- |
| Indicators monitored | Combustion chamber temperature and annual burner inspections. |
| Rationale for monitoring approach | Combustion chamber temperature: Proper temperature range is related to good performance.  Annual burner inspection: Maintain proper operation and efficiency. |
| Monitoring methods location | Combustion chamber temperature: Outlet of combustion chamber.  Annual burner inspection: At the burner. |
| Analytical devices required | Combustion chamber temperature: Thermocouples or alternative methods/instrumentation as appropriate for specific gas stream.  Annual burner inspection: None |
| Data acquisition and measurement system operation | Frequency of Measurement:  Combustion chamber temperature: Once every 15 minutes or recorded continuously on strip chart or data acquisition system.  Annual burner inspection: Annually  Reporting Units:  Combustion chamber temperature: Degrees Fahrenheit (º F)  Annual burner inspection: None  Recording process:  Combustion chamber temperature: Operators log data manually, or recorded automatically on strip chart or data acquisition system.  Annual burner inspection: Operators log data manually. |
| Data requirements | The facility’s historical records on combustion chamber temperature measurements and burner inspection. |
| QA/QC procedures | Calibrate, maintain and operate instrumentation using the procedures that take into account the manufacturer’s recommendations and specifications. |

**3. Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, O&M, and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired VOC control efficiency.

CAM Plan for catalytic oxidizers controlling VOC from spray booths molding, casting, lamination, mixing or cleaning [Other PSEU]

**1.** **Applicability**

* 1. Process/Emission Unit: Spray Booths, Molding, Casting, Lamination, Mixing or Cleaning
  2. Control Technology: Catalytic Oxidizer
  3. Pollutant: Volatile Organic Compounds (VOCs)

**2. Monitoring approach description**

|  |  |
| --- | --- |
| Indicators monitored | Catalyst bed inlet temperature and catalyst activity. |
| Rationale for monitoring approach | Catalyst bed inlet temperature: Indicates whether the gas flowing into catalyst bed is of sufficient temperature to initiate oxidation.  Catalyst activity: Determines conversion efficiency of catalyst; indicates that catalyst is not poisoned or masked beyond operational range. |
| Monitoring methods location | Catalyst bed inlet and outlet temperature: Preheat chamber outlet and catalyst bed inlet.  Catalyst activity: Sample of catalyst. |
| Analytical devices required | Temperature: Thermocouples, or alternative methods/instrumentation as appropriate for specific gas stream.  Catalyst activity: Qualified laboratory (e.g. catalyst manufactures) for determining activity of catalyst sample. |
| Data acquisition and measurement system operation | Frequency of Measurement: Once every 24 hours when in operation, or recorded continuously on strip chart or data acquisition system.  Reporting Units: Degrees Fahrenheit (º F)  Recording process: Operators log data manually, or recorded automatically on strip chart or data acquisition system.  Catalyst activity: Annual analyses of catalyst sample. |
| Data requirements | The facility’s historical records on catalyst bed inlet and outlet temperature measurements.  Catalyst activity: Laboratory results of conversion efficiency. |
| QA/QC procedures | Calibrate, maintain and operate instrumentation using the procedures that take into account the manufacturer’s recommendations and specifications. |

**3. Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, O&M, and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired VOC control efficiency.

CAM Plan for thermal oxidizers controlling VOC from spray booths, molding, casting, lamination, mixing or cleaning and burn-off ovens [Other PSEU]

**1.** **Applicability**

* 1. Process/Emission Unit: Spray Booths, Molding, Casting, Lamination, Mixing or Cleaning, and Burn-off Ovens
  2. Control Technology: Thermal Oxidizer
  3. Pollutant: Volatile Organic Compounds (VOCs)

1. **Monitoring approach description**

|  |  |
| --- | --- |
| Indicators monitored | Combustion chamber temperature and annual burner inspections. |
| Rationale for monitoring approach | Combustion chamber temperature: Proper temperature range is related to good performance.  Annual burner inspection: Maintain proper operation and efficiency. |
| Monitoring methods location | Combustion chamber temperature: Outlet of combustion chamber.  Annual burner inspection: At the burner. |
| Analytical devices required | Combustion chamber temperature: Thermocouples or alternative methods/instrumentation as appropriate for specific gas stream.  Annual burner inspection: None |
| Data acquisition and measurement system operation | Frequency of Measurement:  Combustion chamber temperature: Once every 24 hours when in operation, or recorded continuously on strip chart or data acquisition system.  Annual burner inspection: Annually  Reporting Units:  Combustion chamber temperature: Degrees Fahrenheit (º F)  Annual burner inspection: None  Recording process:  Combustion chamber temperature: Operators log data manually, or recorded automatically on strip chart or data acquisition system.  Annual burner inspection: Operators log data manually. |
| Data requirements | The facility’s historical records on combustion chamber temperature measurements and burner inspection. |
| QA/QC procedures | Calibrate, maintain and operate instrumentation using the procedures that take into account the manufacturer’s recommendations and specifications. |

**3. Justification**

Compliance testing is not necessary for the owner or operator to establish operating ranges so that excursion from the operating ranges can be addressed prior to potential emission exceedance. Monitoring based on the Minnesota Standards of Performance for Control Equipment is adequate to have a reasonable assurance of compliance (daily and periodic inspections, corrective actions, O&M, and hood design records) and to ensure that control equipment continues to operate properly and achieve the desired VOC control efficiency.