

Two commenters pointed out that § 63.7833(d)(1)(iii) of the proposed rule specifies that 1 hour of alarm be logged even if procedures are implemented to determine the cause of the alarm and corrective action is taken in less than 1 hour. The commenters contended that the requirement artificially and unfairly inflates the semiannual percentage of alarm time and does not provide an incentive for sources to initiate procedures as quickly as may be possible. The commenters suggested that the final rule should require the plant to “count the actual amount of time it took to initiate procedures to determine the cause of the alarm.”

Three commenters stated that in the requirement in § 63.9634(d)(1)(v) that the bag leak detection system not alarm for more than 5 percent of the “total operating time,” it is unclear if the “total operating time” refers to the operating time of the affected source or the time the baghouse is actually evacuating emissions generated by the affected source. The commenters pointed out that some baghouses, by design, evacuate emissions for only a few minutes each hour. The commenters recommended that EPA clarify its intent that the “total operating time” refers to the total operating time of the affected source.

Response: We agree with the commenters and have not included the 5 percent operating limit requirement for baghouse leak detectors in § 63.9634(d)(1) of the final rule. As a result, the requirements to log alarm time and to determine the ratio of the sum of the alarm times to the total operating time have also not been included. However, it is important that corrective action be initiated promptly, so we are retaining the requirement in § 63.9600(b)(2) that you “initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours of the alarm, and complete the corrective action as soon as practicable.”

Wet Scrubber CPMS

Comment: Three commenters stated that the labor hours required for the monthly transducer checks and the quarterly gauge calibration checks for the pressure drop sensor (§ 63.9632(b)(1)(iv)), and the semiannual flow sensor calibration checks (§ 63.9632(b)(2)(iii)) are excessive compared to the potential emissions control improvement. Two of the commenters suggested that rather than mandatory monthly, quarterly, or semiannual calibration checks, any control unit which emits less than 5

percent of the total annual PM emissions at the plant should be allowed to reduce the periodic checks required by each of the cited provisions to once annually. The other commenter suggested that the EPA should allow each source to propose an alternative method to the proposed calibration checks to the appropriate permitting agency.

Three commenters stated that the daily pressure tap pluggage check (§ 63.9632(b)(1)(iii)) and monthly electrical connection continuity checks (§ 63.9632(b)(1)(vi)) are overly burdensome and costly to implement. The commenters argued that the manual labor and clock hours required for such continuity checks would be so large that the monitoring systems would have to be shut down so frequently and for such a length of time that they would have virtually no operating time. According to the commenters, these provisions should be modified so as to provide “a program within the CPMS to alarm the process unit operator and to record the alarm for a zero value indication and for a static value indication that satisfies the requirement of this provision.” In addition, one commenter stated that, if no change is made, the labor costs for the continuity checks must be factored into the economic analysis.

Response: The specific installation, operation, and maintenance requirements for wet scrubber CPMS have not been included in the final rule. Therefore, the requirements for monthly transducer checks, quarterly gauge calibration checks, semiannual flow sensor calibration checks, daily pressure tap pluggage checks, and monthly electrical connector continuity checks have not been included in the final rule. In place of the specific requirements, we have included the requirement that, for each CPMS, you must develop and make available a site-specific monitoring plan that addresses the following:

- Installation of CPMS sampling probe so that measurement is representative of control of the exhaust emissions.
- Performance and equipment specifications for the sample interface, the parametric signal analyzer, and the data collection and reduction system.
- Performance evaluation procedures and acceptance criteria (e.g., calibrations).
- Ongoing operation and maintenance procedures in accordance with the general requirements of § 63.8(c)(1), (3), (4)(ii), (7), and (8).
- Ongoing data quality assurance procedures in accordance with the general requirements of § 63.8(d).

- Ongoing recordkeeping and reporting procedures in accordance with the general requirements of § 63.10(c), (e)(1), and (e)(2)(i).

Comment: Three commenters stated that it is inappropriate to set a single (pressure drop) point for operating wet scrubbers and recommended that EPA remove the pressure drop requirement and rely on the operation and maintenance plan for compliance. The commenters pointed out that venturi-rod deck scrubbers operate over a range of pressure drop that is affected by scrubbing water flow rate, scrubber water flow distribution, water temperature, gas temperature, and the square of the process gas flow rate. The commenters stated that operators cannot directly control the pressure drop in a venturi-rod deck scrubber. By setting the average pressure drop at the minimum level established during the performance test, the commenters stated that the rule effectively forces a source to operate well below the emission limit.

Response: In follow-up discussions with the commenters, it was clarified that their comments referred only to venturi-rod deck scrubbers installed on indurating furnaces. These venturi-rod deck scrubbers are fixed-throat scrubbers for which the pressure drop can be measured, but not directly controlled. Two commenters stated that they cannot directly control the pressure drop across the venturi-rod deck scrubbers because of the following factors:

- The scrubbers are of a fixed-throat design;
- The fan drawing or pushing air through the scrubber operates at a fixed speed and fixed diameter; and
- The damper prior to the scrubber is used to control the overall flow of air through the system; therefore, it cannot be used to control the pressure drop to the scrubber without affecting the entire process. The damper is opened more or closed more, as necessary, to modulate the air flow as changes occur in the process. As production rate increases, the damper is opened more and, therefore, the pressure drop across the scrubber increases. Due to these factors, the pressure drop across the venturi-rod deck scrubbers on the furnaces is more variable than other controls and is difficult to regulate.

The commenters presented data showing the variability of the pressure drop for their venturi-rod deck scrubbers. One commenter presented pressure drop readings taken every 20 minutes that ranged from 12 to 4 inches of pressure drop, with very few points below 4 inches of pressure drop.