

STATEMENT OF BASIS

To: Reviewers

Through: Michael Stoll, Operating Permit Program Manager 

From: Maggie Endres, Program Principal 

Subject: Draft Operating Permit 3-1-132 for FMC Wyoming Corporation, Westvaco Facility (formerly Green River trona plant, trona mining and soda ash processing facility operating under permit 30-132; and sodium specialty products and utility services facility operating under permit 30-116-2)

Date: July 16, 2007

Attached is a draft renewal Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit for the Westvaco Facility: the Green River trona plant, trona mining and soda ash processing facility (currently operating under permit 30-132), and the sodium specialty products and utility services facility (currently operating under permit 30-116-2). At the request of the permittee, the two facilities are now combined and will function under one operating permit (3-1-132). The trona mining and soda ash processing facility refines trona (sodium bicarbonate/carbonate mineral) into purified soda ash (sodium carbonate). The plant produces soda ash by two slightly different chemical processes: the monohydrate process and the sesqui-carbonate process. A 0.7 million ton per year evaporative lime decahydrate monohydrate (ELDM) plant, known as the mine water plant, recovers sodium carbonate from the alkali water in the underground mine. The sodium specialty products and utility services produces a variety of sodium-related compounds. There is an operation where "burned lime" (CaO, calcium oxide) is produced in a lime kiln from a slurried calcium carbonate feed stock. That CaO is slaked with water to produce a calcium hydroxide solution and the calcium hydroxide is reacted with sodium carbonate solution to produce a sodium hydroxide caustic solution. The resulting calcium carbonate slurry is then recycled back to the lime kiln. The caustic can be pumped into the trona beds, dissolving the ore, which is then brought back to the surface through return wells. The caustic solution can also be concentrated to 50 percent strength in the concentrator plant for outside sales. In another process, sodium carbonate liquor is recarbonated with compressed carbon dioxide to produce a sodium bicarbonate product in the bicarb plant. The permittee notified the Division that the phosphate and sodium cyanide plant operations are now shut down and the associated equipment listed in operating permit 30-116-2 has been retired.

Permit History

The original FMC facility was constructed in the early 1950's. The following permits are listed to document the permitting history. Several short-term and temporary waivers are not included.

EPA Reference 8A-EE (7/26/73): approved expansion of the trona facility, pursuant to 40 CFR 52.2625(b). The EPA required FMC to carry out an ambient monitoring program for particulate and SO₂ emissions, and submit meteorological and ambient data on a monthly basis. EPA Reference 8AH-A (12/14/79): allowed an increase in production of soda ash by debottlenecking existing equipment and systems. The proposed modification was major under 40 CFR 52.21(b)(2) and required the applicant to meet all of the applicable requirements of the Prevention of Significant Deterioration (PSD) regulations. This permit was issued prior to the state's implementation of the PSD program.

WAQSR Ch 8, Sec 2 (1/25/79): was established to address non-attainment with total suspended particulate (TSP) standards in Sweetwater County. Particulate emission limits set under this chapter have been superseded or carried over into subsequent construction permits. Ch 8, Sec 2(c)(ii) lists fugitive dust control requirements which are carried forward to permit 3-1-132.

MD-27 (6/1/79)/OP-145 (7/15/85): allowed modification and operation of the mono plant to increase production capacity. Sources eliminated under these permits include Na-2, Na-3 and Na-6.

CT-310 (6/20/80)/OP-117 (8/9/83): allowed construction and operation of a research and development in-situ solution mining facilities with a solution preparation, lime handling plant, and associated pipelines and well field solution handling equipment. A requirement to treat the access road to the test area with chemical dust suppressant is satisfied by meeting the road dust control requirements from WAQSR Ch 8, Sec 2(c)(ii).

CT-448 (7/1/82)/OP-118 (8/9/83): allowed construction and operation of a bulk soda ash truck loading facility near the Mono plant railcar loading facility (to replace the existing soda ash truck loading facility at the sesqui plant).

MD-41 (6/8/83)/OP-178 (10/30/87): allowed modification and operation of the older process line equipment in the sodium tripolyphosphate plant. The permittee notified the Division by letter 4/11/05 that the phosphate plant operation is now shut down and the equipment has been retired.

CT-520 (12/19/83)/CT-520A (2/26/86)/OP-198 (10/27/89): were issued to construct and operate a coal-fired lime kiln and associated material handling and storage equipment as part of FMC's solution mining process. OP-198 eliminated the SO₂ emission limit for the lime kiln that had been set under MD-520. (The SO₂ emission limit for the kiln was incorrectly carried forward to permit CT-1045 listed below). OP-198 sets CO emission limits for the kiln, and requires the venturi scrubber on the kiln have a continuous device for measurement of the pressure loss of the gas stream through the scrubber. OP-198 also eliminated the coal firing option and requires that natural gas be the sole fuel used to fire the lime kiln.

CT-534 (3/29/84)/OP-179 (10/30/87): allowed construction and operation of a fluid bed calciner as an addition to the sesqui plant operation. The permittee eliminated source RA-13.

CT-603 (5/1/85)/OP-180 (10/30/87): were issued to construct and operate a boiler fly ash collection silo and bulk truck fly ash loadout facility. The requirement to maintain the paved access roads and the loadout area is satisfied by meeting the road paving requirements of WAQSR Ch 8, Sec 2(c)(ii).

CT-684 (4/28/86)/OP-197 (11/1/89): were issued to construct and operate a 100,000 TPY phosphate process line parallel to the existing production line. As noted earlier, the phosphate plant has been retired. OP-197 set a visible emission limit on the mono railcar loadout baghouse (MONO 9).

CT-827 (3/20/89)/OP-234 (6/12/92): were issued to construct and operate a sodium bicarbonate manufacturing plant with two new emission sources: the flash dryer baghouse (BC-1) and product handling area baghouse (BC-2). Permit OP-234 identifies BC-2 as a 40 CFR 60 Subpart OOO-affected source. Subpart OOO limits opacity to seven percent from BC-2 and requires visible emissions from all other sodium bicarbonate fugitive emission sources not exceed 10 percent opacity as specified under Subpart OOO. (The permittee has stated that there are no sodium bicarbonate fugitive emissions).

CT-845 (8/15/89)/OP-238 (10/11/92): allowed construction and operation of a sodium cyanide manufacturing plant. The permittee notified the Division by letter 4/11/05, that the sodium cyanide operation is shut down and the equipment has been retired.

Permit Waiver (11/3/89): was issued for a site-rated 270 horsepower Ajax DPC 360 compressor engine. (This engine is at a remote location about 90 miles from the Green River facility).

MD-112 (11/21/89)/OP-233 (6/12/92): allowed modification and operation of a sesqui plant soda ash bagging facility and railcar product shuttle system with an industrial ventilation system and housekeeping baghouse (RA-28) for dust collection in the rail receiving, ash storage, and bagging areas of the process. OP-233 required the removal of the existing sesqui bagging facility and equipment including baghouse RA-27, and identifies RA-28 as a 40 CFR 60 Subpart OOO source.

MD-120 (3/13/90)/OP-237 (10/11/92): allowed modification and operation of a second mono ore reclaim conveyor and crushing/screening operation with a wet scrubber controlling the area industrial ventilation system exhaust, identified as unit MONO 11. OP-237 identified MONO 11 as a Subpart OOO source, which requires permanently installed equipment to continuously measure and record the pressure drop and liquor recirculation rate for the scrubber; and requires a semiannual report to the Division itemizing all time periods when the pressure drop or liquor recirculation rate measured on the scrubber differs by ± 30 percent from the values obtained during the most recent performance test on the stack.

Division letter (4/3/91): required installation of a continuous opacity monitor on the Mono-2 calciner stack.

CT-1045 (9/7/93): allowed construction of a new processing plant to utilize the sodium carbonate content of the alkali water from the underground mine. Equipment constructed under this permit included the mine water lime baghouse (MW-1), mine water lime slaker (MW-2), mine water fluid bed dryer scrubber (MW-3), soda ash storage housekeeping baghouse (MW-4), and mine water plant boiler (MW-5). As a tradeoff for new emission sources, FMC replaced the scrubber on the sesqui gas fired calciner (RA-24). The permittee eliminated source RA-2 in the sesqui Plant. Permit CT-1045 required FMC to participate in a regional visibility monitoring program. The regional visibility monitoring requirement was removed by Division letter dated July 3, 1995.

Permit CT-1045 identifies MW-4 as a Subpart OOO source, and sets a grains per actual cubic feet of exhaust limit on the new RA-24 scrubber. Permit CT-1045 requires permanently installed equipment to continuously measure and record the pressure drop and liquor recirculation rate for the RA-24 and MW-3 scrubbers. Permit CT-1045 also sets NO_x and SO₂ emission limits for several sources.

Permit CT-1045 set particulate emission limits on the Mono plant ore stockpile (MONO PILE), sesqui plant ore stockpile (SESQUIPILE), wind and road fugitive dust (WIND/ROAD), and sesqui railcar loading (SESQUILOAD), and set NO_x emission limits on heavy equipment and locomotive sources (HVYEQUIP). These limits were carried forward to permits CT-1134, OP-265 and CT-1187. Due to the impracticality of testing for mass particulate emissions from fugitive sources, the particulate emission limits for the fugitive sources are not included in the operating permit. The NO_x emission limits on the heavy equipment and locomotive are not included in the operating permit because the Division does not regulate mobile sources.

Waiver (9/23/93): was issued for modifications to the phosphate plant housekeeping dust control systems. This waiver eliminated source PP-27. As noted earlier, the phosphate plant has been retired.

Division letter (5/22/94): establishes that particulate emission testing utilize Methods 5/202, treating the front half particulate catch and the inorganic (mineral) portion of the 202 back half as controllable particulate emissions subject to the current emission standards.

CT-1134 (3/3/95)/OP-265 (10/25/96): allowed construction and operation of a new fluid bed calciner (RA-29), to replace an existing steam tube calciner (RA-14) in the sesqui soda ash production facility. As an emission tradeoff, FMC replaced the low efficiency wet scrubber on the phosphate plant

secondary calciner (PP-25) with a new high efficiency venturi scrubber. Permit CT-1134 condition #14 required FMC to develop an inventory for total plant emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). This condition was removed under permit MD-334 listed below. Permit CT-1134 incorrectly identified RA-29 as an NSPS Subpart OOO source. Calciners are not affected facilities under Subpart OOO. This error was carried forward to permits OP-265 and MD-334. OP-265 sets particulate emission limits for all sources, and sets a 20 percent opacity limit on RA-29. OP-265 incorrectly combined the particulate emission limits for NS-2A and NS-2B, and listed these two sources as one source called NS-2. The permitted limits and sources were identified correctly in operating permit 30-116.

Division letter (8/21/95): establishes the allowable opacity from the NS-3 monitor at 17 percent.

CT-1045A (11/27/95): modified the gas-fired boiler (MW-5) by increasing the capacity from 234 to 315 MMBtu/hr. CT-1045A sets a lb/MMBtu, as well as a lb/hr, NO_x and CO limit on the boiler. CT-1045A requires a continuous in-stack NO_x monitoring system for the boiler, increases the lb/hr definition of excess emissions, and identifies the boiler as a 40 CFR 60 Subpart Db-affected source. (Subpart Db requires NO_x compliance be determined by a continuous monitoring system).

CT-1187 (11/28/95): was issued to construct a new product screening facility in the Mono soda ash loadout area and modify the existing mono loadout facility. CT-1187 also added a previously unrecognized source: MONO 1, a small dissolver scrubber in the mono plant. Modifications were made to the MONO 9 and MONO 10 baghouse industrial ventilation systems. CT-1187 identified units MONO-12, MW-2 and MW-4 as NSPS Subpart OOO sources, which limits particulate in grams on a dry standard cubic meter of exhaust basis, and sets a seven percent opacity limit. (MW-2 was originally permitted as a lime slaker vent scrubber under CT-1045 listed above, but was changed to precoat bin vent baghouse and identified as a Subpart OOO source under permit CT-1187). The permittee eliminated source MONO 7.

Waiver AP-Q47 (5/2/97): allowed replacement of the RA-33 scrubber and modification of the industrial ventilation ductwork.

MD-334 (9/19/97): was issued to modify permits CT-1134/OP-265 to allow an increased production throughput for the RA-29 sesqui plant fluid bed calciner. MD-334 limits particulate emissions for the unit RA-29 calciner scrubber to 0.05 grams per dry standard cubic meter of exhaust (0.02 grains per dry standard cubic foot), not to exceed 3.45 pound per hour. Permit MD-334 requires permanently installed equipment to continuously measure and record the pressure drop and liquor recirculation rate for the scrubber.

Condition #14 from permit CT-1134 required FMC to develop an inventory for total plant VOC and HAP emissions. After receiving comments from FMC on permit MD-334 the Division agreed the requirement to develop an inventory for total plant VOC and HAP emissions should not be a condition of the operating permit. This condition was omitted from permit MD-334.

CT-1045 Administrative Amendment (8/16/99): CT-1045 specified an incorrect NO_x limit for one source. This letter administratively amended CT-1045.

MD-500 (9/1/00): increased the allowable flaring hours for the sodium cyanide plant flare. As noted earlier, the cyanide plant has been retired.

MD-608 (3/30/01): allowed conversion of the plant feed stock from elemental phosphorus to purified phosphoric acid. As noted earlier, the phosphate plant has been retired.

MD-964 (12/30/03): modified operation to recover sodium decahydrate material from the west evaporation pond on a permanent seasonal basis. The permittee must comply with the applicable requirements of 40 CFR 60 Subpart OOO for the conveyor associated with the recovery operation. The permittee explained that the portion of the conveyor that transfers decahydrate material into the melter vessels is enclosed within the melter building. The melter building is limited to no visible emissions as determined by Method 22 of Appendix A, 40 CFR 60. All haul roads, work areas and stockpiles associated with the recovery operations are to be treated with water and/or chemical dust suppressants to control fugitive dust emissions. The sodium decahydrate surge pile is limited to 2,400 tons and must be eliminated at the completion of seasonal operations, such that the pile does not become a source of fugitive emissions. The permittee is also required to record the dates of sodium decahydrate mining and hauling activities, as well as the amount of material hauled from the evaporation lake to the surge pile each day.

MD-1216 (8/23/05): allows construction of a sodium carbonate scrubber to control hydrogen sulfide emission from the evaporator/stripped vent stream of the ELDM plant. The unit has not yet been constructed. Reporting and performance testing conditions are included in the operating permit. H₂S emissions from the scrubber (MW-6) are not to exceed 2.0 lb/hr and 8.8 tpy.

AP-3581 (4/13/06): allowed modification of the lime slaker scrubber (RD-3) from a dynamic fan system, to a passive ventilation system. The permit sets opacity and particulate emission limits, and requires performance testing.

Other Applicable Requirements

The Mono boilers (NS-1A and NS-1B) are subject to 40 CFR 60 Subpart D, based on the July 1973 commencement of construction date. Subpart D establishes opacity, particulate, SO₂, and NO_x emissions standards for affected sources. For each emission standard established in Subpart D for the boilers, additional WAQSR standards also apply. For NO_x emissions, the 0.75 lb/MMBtu emission limit in WAQSR Ch 3, Sec 3 applies as these units are considered existing solid fossil fuel fired fuel burning equipment. This limit is less stringent than the 0.70 lb/MMBtu Subpart D limit, subsequently, the Subpart D limit is incorporated into the draft operating permit. For SO₂ emissions, Ch 3, Sec 4 limits emissions from each boiler to 1.2 lb/MMBtu based on fixed two-hour averages. Subpart D establishes a 1.2 lb/MMBtu SO₂ standard based on fixed three-hour averages. The Division currently enforces the Subpart D requirements and considers them to meet the intent of the Ch 3, Sec 4 two-hour average. The boilers are also subject to the opacity and particulate emission limitations of Ch 3, Sec 2. Although particulate emissions in both cases are limited to 0.10 lb/MMBtu of heat input, Ch 3, Sec 2 specifies this is a two-hour average while Subpart D relies on the average results of three one-hour tests. As a matter of policy, the Division enforces the Subpart D requirements and considers them to meet the intent of the Ch 3, Sec 2 two-hour average. Both regulations set the allowable opacity at 20 percent with Ch 3, Sec 2 allowing 40 percent opacity for two minutes per hour, while Subpart D allows one six-minute average per hour of up to 27 percent. Subpart D requires the installation of a continuous opacity monitor and defines exceedences as six-minute periods which surpass 20 percent opacity (excluding one period where up to 27 percent opacity is allowed). To minimize the additional data handling and reporting requirements created by compliance with both standards, the Division enforces the Subpart D requirements and considers them to meet the intent of the Ch 3, Sec 2 regulation. Per subpart D requirements, continuous emissions monitoring for opacity, NO_x, SO₂, and either oxygen or carbon dioxide is required for each boiler. The boilers are subject to excess emissions reporting requirements under this subpart.

The mine water plant boiler (MW-5) is subject to the continuous NO_x emissions monitoring, recordkeeping and reporting requirements under 40 CFR 60 Subpart Db.

The Mono power housekeeping (NS-2A and NS-2B), Mono power coal unloading, and Mono power coal housekeeping are subject to 40 CFR 60 Subpart Y which limits visible emissions to less than 20 percent opacity.

Six sources are subject to the requirements of 40 CFR 60 Subpart OOO. Visible emissions from the Subpart OOO sources are limited to seven percent opacity except a wet scrubber-controlled source which has an opacity limit under WAQSR Ch 3, Sec 2.

The lime kiln is subject to the requirements of 40 CFR 63 Subpart AAAAA and the boilers are subject to the requirements of 40 CFR 63 Subpart DDDDD.

An unleaded gasoline tank (UNLEAD1) is exempt from 40 CFR 60 Subpart Kb due to the tanks use as a gasoline service station where gasoline is dispensed to motor vehicle fuel tanks.

Changes From the Current Operating Permit

The phosphate plant and the sodium cyanide plant have been retired. The sodium cyanide plant required FMC to maintain pressurized ammonia storage tanks. These tanks were not point sources, but required FMC to submit a Risk Management Plan (RMP) to the EPA, including a Prevention Program 3 for accidental ammonia releases. Since this operation is retired, the RMP is no longer required. Retired phosphate and cyanide source IDs are: PP-11, PP-12, PP-20, PP-21, PP-24, PP-25, PP-26, PP-28, PPA, NACN-1, NACN-2, and NACN-3. Additional units that have been removed or retired include RA-15, RA-16 and SM-2.

According to the permittee, the potential for emission from several sources have been eliminated and as such, there are no emissions to the atmosphere from these units. These sources are: SM-3, RD-2, NS-5, NS-7, NS-8 and NS-9. Descriptions for the removed/retired sources are as follows:

Source ID	Description	Source ID	Description
PP-11	Number 2 Phosphorus Furnace	PP-12	Number 1 Phosphorus Furnace
PP-20	Phosphate Plant Rotary Dryer	PP-21	Phosphate Plant Spray Dryer
PP-24	Phosphate Plant Housekeeping	PP-25	Phosphate Plant Secondary Calciner
PP-26	Phosphate Plant Housekeeping	PP-28	Phosphate Rotary Housekeeping
PPA	Phosphate Plant Phosphoric Acid Evaporator	NACN-1	NACN Thermal Combustor
NACN-2	NACN Emergency Flare	NACN-3	NACN Air Preheater
RA-15	Sesqui Steam Tube Calciner	RA-16	Sesqui Steam Tube Calciner
SM-2	Coal Storage Bin Vent	SM-3	Kiln Product Storage Bin Vent
RD-2	Lime Storage Bin Vent	NS-5	Mono 2 Dissolver Vent
NS-7	Mono Power Coal Unloading	NS-8	Mono Power Coal Housekeeping
NS-9	Mono Power Coal Housekeeping		

The heaters have been removed from mine shafts 5 and 7. Additionally, as indicated in Section A of the operating permit application, the permittee explained that the remaining mine heaters have been reconfigured. There are 12 heaters total (4 heaters each in shafts 5, 7 and 8), which exhaust through the mine ventilation shafts (shafts 2, 3, 4, 6 and 9). The heaters are now direct fired and there are no stacks. The mine heaters have been omitted from permit 3-1-132. The permittee also explained that equipment has been removed which allowed boiler PH-3 to burn used oil. The footnote referring to 20-30 hours of burning used oil is omitted from permit 3-1-132. Several dehydration units and a compressor engine were included in the source emissions points table in permit 30-116-2. These are located at a remote site about 80 miles from the plant and are omitted from permit 3-1-132.

For consistency with other facilities, FMC will submit compliance certification Jan. 31st, instead of July 31st.

Periodic Monitoring and Compliance Assurance Monitoring (CAM)

Particulate control equipment includes 13 baghouse, 22 scrubbers and 3 ESPs. The baghouses (with two exceptions), scrubbers (with one exception) and ESPs are subject to CAM requirements for particulate emissions. For particulate emissions from 11 baghouses, daily visual observations will be conducted. For the two baghouses which are not subject to CAM, weekly visual observations will be conducted. Upon detection of any visible emissions, corrective action will be taken. CAM for the scrubber controlled sources (except RD-3) will consist of continuously monitoring the liquor recirculation rate, and in some cases also the scrubber pressure drop. Based on performance testing on unit RD-3 (to demonstrate compliance with the particulate limits set under AP-3581), periodic monitoring of visible and particulate emissions will be not required. CAM for the Mono calciner ESP will utilize the continuous opacity monitor, based on a correlation with particulate emissions. For the two additional ESP sources, which are both Mono boilers, CAM will consist of continuously monitoring the voltage and current. The CAM indicator range for these boilers has not been developed. A correlation will be developed through particulate testing, and a revised CAM plan should be in place no later than 180 days after permit issuance.

Particulate testing for the scrubber and ESP sources will be required (based on source size and testing conducted to date), to verify compliance with the permitted emission limits, and to assess the correlation between the CAM parameters, and particulate emissions. Large CAM scrubber sources will require annual testing (RA-22, RA-25 and MONO 5), with the exception of RA-23. Since RA-23 has several years of reliable data on which to establish CAM parameters, particulate testing will only be required once more during the remainder of the permit term. The remaining scrubber controlled equipment consists of small CAM sources. Sources which have been tested, but not recently, (RA-24, RA-26, RA-29, MONO 4, MONO 6 and MONO 11) will be required to perform particulate testing at least once before the end of the permit term to confirm the CAM parameters. Small CAM sources which have recent testing (RA-1, RA-33, NS-6, MW-3 and SM-1) on which to base CAM parameters will not be required to perform additional testing during the remainder of the permit term. The remaining scrubber controlled units (MONO 2, MONO 3, MONO 8, NS-4, PA-4 and PA-5), are similar units with similar scrubber controls. (Controlled particulate emissions from these six sources range from 4 to 11 tons per year). Testing was conducted on MONO 2, to establish a gpm/1000 acfm scrubber flow ratio as the CAM indicator for these units. Testing will be required before the end of the permit term on units NS-4 and PA-5 to further verify the flow ratio.

Periodic monitoring for particulate emissions from the sesqui plant dissolver vents (PA-6, PA-7, PA-8 and PA-9) is not required since the particulate emissions from these sources are of negligible impact on ambient standards. For the sesqui boilers (PH-1A, PH-1B, PH-2 and PH-3) and mine water plant boiler (MW-5), no periodic monitoring for visible emissions is required as long as natural gas is the sole fuel source used.

For H₂S emissions from the mine water stripper vent (MW-6), the permittee shall begin compliance assurance monitoring upon development of the indicator range for the scrubber, as expeditiously as practicable, but no later than 180 days after the date of startup of this source.

Periodic monitoring of NO_x emissions from the Mono 2 calciner (NS-3) and lime kiln (SM-1) shall consist of annual Method 7 testing. Periodic monitoring of NO_x emissions from the Sesqui boilers (PH-1A, PH-1B, PH-2 and PH-3) shall consist of Method 7 testing for each boiler operated at least 3000 hours in any calendar year during the permit term. However, unit PH-3 shall be tested at least once during the permit term. (The permittee will record if a unit is not operated for a year). Periodic monitoring of NO_x emissions from the sesqui calciners (RA-22A&B, RA23A&B and RA-24) and the Mono 1 calciner (MONO 5) shall consist of Method 7 testing for NO_x emissions once during the

permit term. For the Baby Sesqui calciner (RA-1), the permittee may rely on proper operation and maintenance as the periodic monitoring method. In accordance with Subpart D requirements, the Mono boilers (NS-1A and NS-1B) shall have a continuous in-stack monitoring system for measuring NO_x emissions. In accordance with Subpart Db requirements, the mine water plant boiler (MW-5) shall have a continuous in-stack monitoring system for measuring NO_x emissions.

Periodic monitoring of CO emissions from lime kiln (SM-1) and mine water plant boiler (MW-5) shall consist of Method 10 or portable analyzer testing once during the permit term.

In accordance with Subpart D requirements, the Mono boilers (NS-1A and NS-1B) shall have a continuous in-stack monitoring system for measuring SO₂ emissions.