

### Malfunction Abatement Plans

The permittee's Maintenance Manager shall be responsible for overseeing the inspection, maintenance and repair of air-cleaning devices. The permittee will keep critical replacement parts in inventory to facilitate quick repairs.

### Particulate Sources (non-boiler)

Upon discovery of visible particulate emissions being discharged from an externally vented emission unit, the permittee shall implement the following procedures:

1. (*Operations Supervisor*) Notify Maintenance of the malfunction.
2. (*Maintenance*) Determine the cause of the malfunction and implement corrective measures.
3. (*Operations Supervisor*) Inform the Operations Manager of the malfunction.

**NOTE: Any malfunctioning equipment operating and, therefore, emitting visible emissions for greater than 2 hours must be reported to the DEQ as soon as possible but not later than 2 business days of the malfunction's discovery. A written report, if required, may be due to the DEQ within 10 days (see General Condition #25).**

4. (*Operations Supervisor or Operations Manager*) Within 24 hours of any malfunction discovery, a "Dust Collector Upset Log" form (found in the SQF Tree) should be completed and e-mailed to the Operations Manager and the EHS Manager. A phone call or e-mail to the Operations Manager and the EHS Manager with the information below can also be used to communicate the malfunction:

- a. Date and time of malfunction discovery
- b. Description of malfunction
- c. Reason for malfunction and description of corrective action taken
- d. Length of time unit was operating while emitting visible emissions (i.e. from time of malfunction discovery to the time the unit was shutdown or repaired)
- e. Date, time and results of follow-up visible emission check.

5. (*EHS Manager*) If malfunctioning equipment emitted visible emissions for greater than 2 hours, make notification to the Kalamazoo Air Quality Division (269-567-3500) within 2 business days of malfunction discovery via phone or e-mail.

6. (*EHS Manager*) If notification was made to the Kalamazoo Air Quality Division, prepare a written report using the Renewable Operating Permit Report Certification (EQP 5736) form and the Renewable Operating Permit Deviation Report (EQP 5737) form. Submit these forms to the Kalamazoo Air Quality District within 10 business days (see General Condition #25).

7. (*EHS Manager*) Report all malfunctions emitting visible emissions for greater than two hours on the Annual and Semi-Annual (March 15<sup>th</sup>) and Semi-Annual (September 15<sup>th</sup>) renewable operating permit (ROP) compliance certifications.

**Catalytic Oxidizer29113 (VOCs)**

If the catalytic oxidizer is not operating properly for more than 15 minutes, the permittee shall implement the following procedures:

1. (*Operations Supervisor*) Notify Maintenance of the malfunction.
2. (*Maintenance*) Determine the cause of the malfunction and implement corrective measures.
3. (*Operations Supervisor*) Notify the Operations Manager and the EHS Manager via e-mail or phone within 24 hours of any malfunction discovery and enter information into the Oxidizer Malfunction Log (found in the SQF Tree). Provide them with the following information:
  - Date and time of malfunction discovery
  - Description of malfunction
  - Reason for malfunction and description of corrective action taken
  - Date and time of unit start-up. Temperature of unit at start-up.
  - Length of time unit was operating while emitting excess emissions (i.e. from time of malfunction discovery to the time the unit was shutdown or repaired)
4. (*EHS Manager*) Report all malfunctions continuing for more than 15 minutes on the Annual and Semi-Annual (March 15<sup>th</sup>) and Semi-Annual (September 15<sup>th</sup>) renewable operating permit (ROP) compliance certifications.