



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY**

**GENERAL**

**AIR CONTAMINANT DISCHARGE PERMIT**

Department of Environmental Quality  
 Air Quality Division  
 Air Operations Section  
 700 NE Multnomah Street, Suite 600  
 Portland, OR 97232  
 Telephone: (503) 229-5696

This permit is being issued in accordance with the provisions of ORS 468A.040 and OAR 340-216-0060.

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**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

Signed copy on file with DEQ	2/17/2022
Ali Mirzakhali, Air Quality Division Administrator	Dated

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Seed cleaning and associated grain elevators in Special Control Areas<sup>1</sup> with 5,000 tons per year or more throughput. SIC 0723.

<sup>1</sup> The following areas are designated as Special Control Areas: The counties within the Willamette Valley, including Benton, Clackamas, Columbia, Lane, Linn, Marion, Multnomah, Polk, Washington and Yamhill Counties; Umpqua Basin; Rogue Basin; and within incorporated cities having a population of 4,000 or more, and within three miles of the corporate limits of any such city. [OAR 340-204-0070]

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## **1.0 PERMIT ASSIGNMENT**

### **1.1. Qualifications**

The permittee must meet all of the following Conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):

- a. The permittee is performing seed cleaning operations as described on the cover page of this permit, including supporting activities.
- b. A Simple or Standard ACDP is not required for the source.
- c. The source is not having ongoing, recurring or serious compliance problems.

### **1.2. Assignment**

DEQ will assign qualifying permittees to this permit that have and maintain a good record of compliance with DEQ's Air Quality regulations and that DEQ determines would be appropriately regulated by a General ACDP. DEQ may rescind assignment if the permittee no longer meets the qualifications in Condition 1.1 above, conditions of OAR 340-216- 0060, or the Conditions of this permit.

### **1.3. Permitted Activities**

Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the first page of this permit in addition to any categorically insignificant activities, as defined in OAR 340-200-0020, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

### **1.4. Relation to Local Land Use Laws**

This permit is not valid in Lane County, or at any location where the operation of the permittee's processes, activities, or insignificant activities would be in violation of any local land use or zoning laws. For operation in Lane County, contact Lane Regional Air Protection Agency for any necessary permits at (541) 736-1056. It is the permittee's responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

## **2.0 GENERAL EMISSION STANDARDS AND LIMITS**

### **2.1. Visible Emissions**

The permittee must comply with the following visible emission limits:

- a. Visible emissions must not equal or exceed 20% opacity;
- b. The visible emissions limitation in this condition is based upon a six-minute block average of 24 consecutive observations recorded at 15-second intervals as specified in OAR 340-208-0110(2); and
- c. The visible emission standard in this condition does not apply to fugitive emissions from the source.

### **2.2. Fugitive Emissions**

The permittee must comply with the following: [OAR 340-208-0210]

- a. The permittee must take reasonable precautions to prevent particulate matter from becoming airborne from all site operations from which it may be generated. Such reasonable precautions include, but are not limited to:

- i. Controlling vehicle speeds on unpaved roads;
  - ii. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne particulate;
  - iii. Full or partial enclosure of material stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - iv. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
  - v. The prompt removal from paved street of earth or other material that may become airborne;
  - vi. Alternative precautions approved by DEQ.
- b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period.
  - c. Compliance with the fugitive emissions standard in Condition 2.2b is determined by EPA Method 22 at the downwind property boundary.
  - d. If requested by DEQ, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period as determined by EPA Method 22.

### **2.3. Particulate Matter Fallout**

The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person.

### **2.4. Nuisance and Odors**

The permittee must comply with the following nuisance and nuisance odor requirements, as applicable:

- a. The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel.
- b. When operating in Clackamas, Columbia, Multnomah, and Washington Counties, control apparatus and equipment, using the highest and best practicable treatment currently available, must be installed and operated to reduce to a minimum odor-bearing gases or odor-bearing particulate matter emitted into the atmosphere.

## **3.0 OPERATION AND MAINTENANCE REQUIREMENTS**

### **3.1. Inspection and Proper Operations**

Notwithstanding Condition 3.2, the permittee must **perform an inspection of the facility at least once each month**. The monthly inspection must:

- a. Document and identify all existing fugitive emission reduction and reasonable precaution efforts (See Condition 2.2a);
- b. Document and identify all existing pollution control equipment;
- c. Include a description of any repairs, adjustments, or corrective actions taken in response to the monthly inspection;
- d. Include a determination as to whether the current fugitive emissions reduction efforts and pollution control equipment are working properly and sufficient to comply with Condition 2.2; and
- e. Include an EPA Method 22 reading while the facility is in operation.

- i. For each Method 22 observation that demonstrates fugitive particulate emissions left the property for 18 seconds in a six-minute period, the permittee must identify the cause and take corrective action within seven (7) calendar days.
- ii. Following the corrective action(s) completion pursuant to Condition 3.1.e.i, the permittee must conduct a subsequent Method 22 observation during the same or next day of operations and comply with Condition 3.1.e.i and (iii).
- iii. If the corrective action(s) required by Condition 3.1.e.i are not completed within fourteen (14) calendar days, the permittee must develop and implement a fugitive emission control plan according to Condition 2.2d. Fugitive emission control plans must include, but are not limited to, the reasonable precautions identified in Condition 2.2a that will prevent any visible emissions from leaving the property for more than 18 seconds in a six-minute period following the procedures of EPA Method 22.

### 3.2. Operations & Maintenance Plan

While operating in the Medford-Ashland AQMA, the permittee must prepare and implement an operation and maintenance (O&M) plan in accordance with OAR 340-240-0190 (See Condition 13, Table 2).

### 3.3. Repair and Replacement of Equipment

The permittee must repair or replace any equipment that is worn, defective, ineffective, or otherwise allowing or causing excess particulate matter to become airborne or leave the property boundary.

## 4.0 PLANT SITE EMISSION LIMITS

### 4.1. Plant Site Emission Limits (PSEL)

The permittee must not allow plant site emissions to exceed the following:

Pollutant	Limit	Units
PM	24	tons per year
PM10	14	tons per year

### 4.2. PM10 PSEL for Medford-Ashland AQMA

For sources operating in the Medford-Ashland AQMA, the permittee must not allow plant site emissions of PM10 to exceed the following:

Pollutant	Limit	Units
PM10	4.5	tons per year
	49	pounds per day

### 4.3. Annual Period

The annual plant site emissions limits apply to each 12-consecutive calendar month period.

## 5.0 COMPLIANCE DEMONSTRATION

### 5.1. Monitoring Requirements

The permittee must monitor the operation and maintenance of the plant and associated air contaminant control devices as follows:

- a. Monitor monthly throughput for each type of equipment or activity listed in Condition 12, table 1; and
- b. Perform the monthly inspections, corrective actions, and Method 22 observations as required by Condition 3.1.

### 5.2. PSEL Compliance Monitoring

Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = \frac{\Sigma(EF \times P)}{2000}$$

Where,

E	=	pollutant emissions (tons/yr);
EF	=	pollutant emission factor (see Table 1);
p	=	material throughput (tons)

### 5.3. Emission Factors

The permittee must use the default emission factors provided in Condition 12, Table 1, for calculating pollutant emissions, unless alternative emission factors are approved by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ.

## 6.0 RECORDKEEPING REQUIREMENTS

### 6.1. Monitoring Requirements

The permittee must monitor and maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:

- a. Amount of seed processed on a monthly basis for each type of equipment or activity listed in Condition 12, Table 1; and
- b. Records of all monthly plant inspections and the information identified in Condition 3.1. Records must also include the following:
  - i. Printed name of the individual(s) who conducted each inspection;
  - ii. The dates all inspections and Method 22 observations were conducted;
  - iii. The date all corrective actions were completed;
  - iv. The results of all post-corrective action Method 22 observations; and
  - v. If required by Condition 3.1.e.iii, a copy of the fugitive emission control plan and all subsequent revisions.

### 6.2. Plans

**Operation and Maintenance plan:** Permittees that operate within the Medford-Ashland AQMA (either permanently or temporarily) must retain a copy of the implemented O&M plan onsite in accordance with Condition 13, Table 2. [OAR 340-240-0190]

**Fugitive Emission Control plan:** Permittee that are required to develop and implement a fugitive emission control plan pursuant to Condition 3.1.e.iii must retain a copy of the plan onsite.

### 6.3. Complaint Log

The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. The permittee must investigate the condition within 24 hours, if possible.

- a. The date the complaint was received;

- b. The date and time the complaint states the condition was present;
- c. A description of the complaint;
- d. The location of the complainant or receptor relative to the plant site;
- e. The status of plant operations and activities during the complaint's stated time of pollution or odor condition;
- f. A description of the permittee's actions to investigate the validity of the complaint; and
- g. A description of any actions taken in response to the complaint investigation.

#### **6.4. Excess Emissions**

The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period.

#### **6.5. Retention of Records**

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of each report or record and make them available to DEQ upon request. Records must be retained onsite or otherwise readily available electronically for expeditious review during an on-site inspection.

## **7.0 REPORTING REQUIREMENTS**

### **7.1. Excess Emissions**

The permittee must notify DEQ by telephone or in person of any excess emissions which are of a nature that could endanger public health.

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 8.3.
- b. If the excess emissions occur during non-business hours, the permittee must notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
- c. The permittee must also submit follow-up reports when required by DEQ.

### **7.2. Annual Report**

The permittee must submit to DEQ by February 15 of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year:

- a. The amount of seed processed in tons for each type of equipment or activity listed in Condition 12, Table 1.
- b. A statement certifying that all monthly inspections and Method 22 observations were completed.
- c. If a fugitive emission control plan is required pursuant to Condition 3.1.e.iii, a copy of the plan. If a fugitive emission control plan was required in a previous year and has already been submitted to DEQ with a previous annual report, the permittee must only provide either copies of all subsequent revisions or a statement certifying that no changes have been made to the plan.
- d. A description of all maintenance activities, corrective actions, and repairs conducted to reduce or prevent particulate matter from becoming airborne, to reduce or prevent

- e. fugitive emissions, or on any pollution control equipment;
- e. A summary of complaints received relating to air quality concerns and the permittee's response or follow-up action(s);
- f. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions; and
- g. The current plant site contact. Provide name, title, phone number and email address.

### **7.3. Initial Startup Notice**

The permittee must notify DEQ in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.

### **7.4. Notice of Change of Ownership or Company Name**

The permittee must notify DEQ in writing using a DEQ "Transfer Application Form" within 60 days after any of the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

### **7.5. Construction or Modification Notices**

The permittee must notify DEQ in writing using a DEQ "Notice of Intent to Construct Form," or, permit application form, and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

### **7.6. Where to Send Reports and Notices**

Reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in Condition 8.3, unless otherwise specified.

## **8.0 ADMINISTRATIVE REQUIREMENTS**

### **8.1. Employee Commute options Program**

Sources located inside the Portland Air Quality Maintenance Area (AQMA) with more than 100 employees at a work site must comply with the Employee Commute Options Program requirements located in OAR 340-242-0020 through 340-242-0390.

For forms (Fact Sheet, Registration, or Survey Guidance documents) or questions regarding ECO, please contact the ECO program directly at 503-229-6154 or [ECO@deq.state.or.us](mailto:ECO@deq.state.or.us).

Additional information is available from DEQ's website for the ECO program located here: <https://www.oregon.gov/deq/air/programs/Pages/ECO.aspx>

### **8.2. Reassignment to the General ACDP**

A permittee that wishes to continue assignment to this General ACDP must submit to DEQ an application for reassignment as follows:

- a. The application must be received by DEQ within 30 days prior to the expiration date

- listed on this permit;
- b. The application must be sent to the appropriate regional office identified in Condition 8.3; and
  - c. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until DEQ takes final action on the Simple or Standard ACDP application.

### 8.3. Permit Coordinator Addresses

All reports, notices, and applications must be directed to the Permit Coordinator for the area where the source is located unless otherwise specified. Please ask for the air quality permit coordinator when calling the general office numbers listed below. The Permit Coordinator addresses are as follows:

Counties	Permit Coordinator Contact Information
Statewide	Once DEQ's online portal Environmental Data Management System, 'Your DEQ Online' is available for this permit, the permittee will be directed to submit any reports, notices, applications, or fees required by this permit within the online system or through the addresses and information provided at that time. Until the online portal is available for this permit, the permittee must use the addresses and information identified below.
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Northwest Region 700 NE Multnomah St., Suite 600 Portland, OR 97232-4100 Telephone: (503) 229-5696 <a href="mailto:NWRaqPermits@deq.state.or.us">NWRaqPermits@deq.state.or.us</a>
Benton, Coos, Curry, Douglas, Jackson, Josephine, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Western Region 4026 Fairview Industrial Drive Salem, OR 97302 Telephone: (503) 378-8240 <a href="mailto:WRaqPermits@deq.state.or.us">WRaqPermits@deq.state.or.us</a>
Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, Wheeler	Department of Environmental Quality Eastern Region 475 NE Bellevue, Suite 110 Bend, OR 97701 Telephone: (541) 388-6146 <a href="mailto:ERaqPermits@deq.state.or.us">ERaqPermits@deq.state.or.us</a>

### 8.4. DEQ Contacts

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page: <http://www.oregon.gov/DEQ/AQ/>. All inquiries about this permit should be directed to the regional office for the area where the source is located. DEQ's regional offices are as follows:



Counties	Office Address and Telephone
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Northwest Region 700 NE Multnomah St., Suite 600 Portland, OR 97232-4100 Telephone: (503) 229-5696
Benton, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Salem Office 4026 Fairview Industrial Drive Salem, OR 97302 Telephone: (503) 378-8240
Coos, Curry, and Western Douglas	Department of Environmental Quality Coos Bay Office 381 N Second Street Coos Bay, OR 97420 Telephone: (541) 269-2721
Eastern Douglas, Jackson, and Josephine	Department of Environmental Quality Medford Office 221 Stewart Avenue, Suite 201 Medford, OR 97501 Telephone: (541) 776-6010
Crook, Deschutes, Harney, Hood River, Jefferson, Sherman, Wasco, and Wheeler	Department of Environmental Quality Bend Office 475 NE Bellevue, Suite 110 Bend, OR 97701 Telephone: (541) 388-6146
Baker, Gilliam, Grant, Malheur, Morrow, Umatilla, Union, and Wallowa	Department of Environmental Quality Pendleton Office 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 Telephone: (541) 276-4063
Klamath and Lake	Department of Environmental Quality Klamath Falls Office 803 Main Street, Suite #201 Klamath Falls, OR 97604-9998 541-273-7002

## 9.0 FEES

### 9.1. Annual Compliance Fee

The annual fees specified in OAR 340-216-8020, Table 2, are due on or by **December 1** of each year this permit is in effect. Invoices indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

### 9.2. Change of Ownership or Company Name Fee

The Non-Technical Permit Modification specific activity fee specified in OAR 340- 216-8020, Table 2, Part 4 is due with an application for changing the ownership or the name of the

company of a source assigned to this permit. Forms that require fees must be sent together to the address in Condition 9.3.

### **9.3. Where to Submit Fees**

Fees, with a permit number prominently displayed, must be submitted to:

Department of Environmental Quality  
Financial Services – Revenue Section  
700 NE Multnomah St. Suite 600  
Portland, OR 97232-4100

## **10.0 GENERAL CONDITIONS AND DISCLAIMERS**

### **10.1. Other Regulations**

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

### **10.2. Conflicting Conditions**

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

### **10.3. Masking of Emissions**

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.

### **10.4. Department Access**

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.

### **10.5. Permit Availability**

The permittee must have a copy of the permit available at the facility at all times.

### **10.6. Open Burning**

The permittee may not conduct any open burning except as allowed by OAR 340 Division 264.

### **10.7. Asbestos**

The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.

### **10.8. Property Rights**

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

### **10.9. Termination, Revocation, Rescission, or Modification**

DEQ may modify or revoke this permit as authorized under OAR chapter 340, division 216.

## 11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O&M	operation and maintenance
AQMA	Air Quality Maintenance Area	PCD	pollution control device
calendar year	The 12-month period beginning January 1st and ending December 31 <sup>st</sup>	PM	particulate matter
CAO	Cleaner Air Oregon	PM <sub>10</sub>	particulate matter less than 10 microns in size
DEQ	Oregon Department of Environmental Quality	PM <sub>2.5</sub>	particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
FCAA	Federal Clean Air Act	PSEL	Plant Site Emission Limit
Gal	gallon(s)	PTE	Potential to Emit
GHG	greenhouse gas	SIC	Standard Industrial Code
lb	pound(s)	Special Control Area	as defined in OAR 340-204-0070
OAR	Oregon Administrative Rules	VE	visible emissions
ORS	Oregon Revised Statutes	year	A period consisting of any 12-consecutive calendar months

## 12.0 TABLE 1: EMISSION FACTORS

### Grain Elevators and Seed Cleaners:

Activity/Emission Source	Type of Control	PM <sup>(2)</sup> (lb/ton) <sup>(1)</sup>	PM10 <sup>(2)</sup> (lb/ton) <sup>(1)</sup>
Receiving: Straight Truck	None	0.18	0.059
Receiving: Hopper truck	None	0.035	0.0078
Receiving: Railcar	None	0.032	0.0078
Receiving: Continuous Barge Unloader	None	0.029	0.0073
Receiving: Barge – Marine Leg	None	0.15	0.038
Receiving: Ship	None	0.15	0.038
Activity/Emission Source	Type of Control	PM <sup>(2)</sup> (lb/ton) <sup>(1)</sup>	PM10 <sup>(2)</sup> (lb/ton) <sup>(1)</sup>
Cleaning	None	0.5 <sup>(3)</sup>	0.125 <sup>(4)</sup>
	Cyclone	0.075	0.019
Drying: Column Dryer	None	0.22	0.055
Drying: Rack Dryer	None	3.0	0.75
	Self-cleaning screens (<50 mesh)	0.47	0.12
Headhouse and Internal Handling	None	0.061	0.034
Shipping: Truck	None	0.086	0.029
Shipping: Railcar	None	0.027	0.0022
Shipping: Barge	None	0.016	0.0040
Shipping: Ship	None	0.048	0.012

Storage Bin (vent)	None	0.025	0.0063
Screen bunker unloading	None	0.5 <sup>(5)</sup>	0.125 <sup>(5)</sup>

- (1) Factors are in units of pound per ton (lb/ton) of grain/seed handled or processed.  
 (2) Unless otherwise noted, emission factors for total particulate and PM<sub>10</sub> from grain elevators and seed cleaning operations are from AP-42 (see 3/03), Table 9.9.1-1, Grain Elevators.  
 (3) Emission factor calculated by using the given control efficiency for a cyclone (85%) and back calculating.  
 (4) PM-10 test data are not available. PM-10 emission factor was estimated by taking 25 percent of the filterable PM emission factor. AP-42 (3/03) Table 9.9.1-1, Grain Elevators.  
 (5) Emission factor for grain cleaning is used for screen bunker unloading - DEQ estimate.

### 13.0 TABLE 2: OPERATIONS & MAINTENANCE PLANS

Operations & Maintenance Plans required pursuant to OAR 340-240-0190 or Condition 3.2:

<b>The purpose of the plan must be to:</b>	Reduce the number of upsets and breakdowns in particulate control equipment.
	Reduce the duration of upsets and downtimes.
	Improve the efficiency of control equipment during normal operations.
<b>The plans must consider and include, but is not limited to:</b>	Personnel training in operation and maintenance.
	Preventative maintenance procedures, schedule and records.
	Logging of the occurrence and duration of all upsets, breakdowns and malfunctions which result in excessive emissions.
	Routine follow-up evaluation of upsets to identify the cause of the problem and changes needed to prevent a recurrence.
	Inspection of internal wear points of pollution control equipment during scheduled shutdowns.
	Inventory of key spare parts.

db/ka/msf:07/25/01. wk:07/15/11. dd:06/22/21.  
 AQGP-015; seed cleaning