

STATE OF MONTANA
AIR QUALITY CONTROL
IMPLEMENTATION PLAN

Subject: Lewis and Clark Co.
Air Pollution
Control Program

ATTACHMENT #2

Compliance Plan for Process Weight and Time of Day Restrictions

Prepared by
Montana Department of Environmental Quality
In Cooperation with ASARCO, Inc.

July 1995

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Compliance Plan

SECTION 1. PURPOSE

ASARCO shall institute the following tracking and handling of Dust materials with process weight or time-of-day restrictions in the East Helena lead control strategy specified in Exhibit A, to which this document is an Attachment. This plan applies to the following affected equipment and facilities:

- (A) Blast Furnace Baghouse Dust Reclaiming (Source 2V)
- (B) Dropping Dust in the Old Ore Storage Yard (Source 3V)
- (C) Charging Dust at the Direct Smelt Bins (Source 8Vi)
- (D) Cleaning out the Blast Furnace Flue (Source 19V)

SECTION 2. DEFINITIONS

"Load Cell" means Loadrites or an equivalent weighing system which can be attached to a loader or forklift.

SECTION 3. REQUIREMENTS

- (A) Blast Furnace Baghouse Dust Reclaiming (Source 2V)

A Load Cell shall be used to determine and record the amount of Dust reclaimed and the time of day the material was reclaimed. The Load Cell shall also be used to identify the different types of Dust material reclaimed.

- (B) Dropping Dust in the Old Ore Storage Yard (Source 3V)

A Load Cell shall be used to determine and record the amount of Dust dropped in the Old Ore Storage Yard and the time of day the Dust was dropped. The Load Cell shall also be used to identify the different types of Dust material dropped.

- (C) Charging Dust at the Direct Smelt Bins (Source 8Vi)

A Load Cell shall be used to determine and record the amount of Dust charged at the Direct Smelt Bins and the time of day the Dust was charged. The Load Cell shall also be used to identify the different types of Dust material charged.

- (D) Blast Furnace Flue Cleanout (19V)

A Load Cell shall be used to determine and record the amount of blast furnace flue Dust cleaned out from the flue and the time of day the flue Dust was cleaned out.

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Section 4. Specifications

- (A) Specified loaders shall be equipped with Loadrites or an equivalent weighing system, referred to in this document as "Load Cell." Each Load Cell shall have the following:
- (1) A printer for verification by the Department of data at time of inspection.
 - (2) A data logger to record weights and other data for downloading to a computer.
 - (3) A weight indicator.
 - (4) A display capable of displaying lighted weights, time, and product number.
 - (5) For loaders handling multiple materials, the system must be capable of handling multiple product numbers.
 - (6) Each Load Cell should be coded to identify which piece of equipment is being used.
- (B) No materials required in Attachment #2, Section 3 to be measured with a Load Cell shall be reclaimed, dropped, charged, or cleaned out within the facility by any handling equipment without a Load Cell with a proper product number.

Section 5. Quality Assurance Procedures

ASARCO shall conduct audits on the Load Cells. The audits shall be conducted and documented weekly, provided that the loaders are being used to move Dust during the week. This will ensure that the equipment is functioning properly. The following items shall be checked for accuracy:

- (A) Verification of correct time, including designation of am or pm.
- (B) Verification of correct date, including day, month, and year.
- (C) Zeroing the equipment.
- (D) A known weight shall be lifted to verify the accuracy of the weighing mechanism. If the accuracy, as defined below, is greater than two (2) percent, then the equipment shall be recalibrated.

$$\text{Accuracy (\%)} = 100 \times \left[\frac{\text{Weight of Standard} - \text{Load Cell Weight}}{\text{Weight of Standard}} \right]$$

Information from weekly audit reports, including any changes or corrections made as part of the audits, shall be submitted to the Department as part of the Quarterly Report required in the Order of the Board of Environmental Review. If, during a week, no weekly audit is required of a loader since no Dust was moved with the aforementioned loader, then this shall be stated in the Quarterly Report.

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Section 6. Training

ASARCO shall provide training to all employees allowed to operate the loaders or any other handling equipment which have Load Cells installed.

ASARCO shall prepare a training document which shall be submitted to the Department within 90 days of the effective date of the emission limitations, but no later than October 31, 1996.

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