



PURPOSE

The purpose of this Best Management Practice is to outline the plan for properly completing compliance assurance monitoring (CAM) reports while complying with all state and federal regulations.

WHAT IS COMPLIANCE ASSURANCE MONITORING?

The Freeport-McMoRan Morenci Inc.'s (FMMI) Title V Air Quality Permit #57883 stipulates that the FARR dust collectors #1 and #2 at the Secondary Screening Plant (SSP) are to be monitored in continuous operation at all times that the emission points are operating.

MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

Daily monitoring and recordkeeping of visible emissions from the control equipment shall be conducted by facility personnel using a 1-minute visible emission survey (EPA Method 22-like procedure). Excursion determinations: Any opacity observed during the 1-minute visible emission survey under EPA Reference Method 22-like procedures constitutes an excursion event. Operations are responsible for notifying Morenci Management and the Environmental Services Department of any emissions. As described in the FMMI Title V Air Quality Permit, if any visible emissions are observed an EPA Method 9 Visual Emission Observation must be performed by a certified Method 9 FMMI employee on the source.

1. There are two possible scenarios that might be encountered, but not limited to, when taking a CAM reading at a FARR dust collector. The scenarios and the actions to be taken are summarized below:

Operational Status	Action Required
Ore <u>IS</u> being conveyed	Take a CAM Reading
Ore <u>is NOT</u> being conveyed	Do <u>NOT</u> take a CAM reading until equipment is operational within the current 24-hour period (and then only during daylight hours).
If the equipment associated with the SSP is down, report it to Environmental Services. Contact the responsible Supervisor and inform them the equipment is down and defer CAM responsibility to the operations supervisor if the equipment becomes operational within the same 24-hour period. The responsible party should record the date, time, and details of conversation with the operations Supervisor on the CAM form in the comments section.	

2. To take a CAM reading of a FARR dust collector, safely position yourself with the sun as directly behind you as possible (ideal case), with a contrasting background (e.g., a blue sky or dark green tree) behind the dust collector vent, with as clear of a view of the dust collector vent as possible. The access platform underneath the R10/R3 Transfer Point serves as an adequate observation point during the morning hours.
3. Record the start time for each CAM observation.
4. Observe the dust collector every 15 seconds over a 60-second period.



- For every 15-second observation, circle “N” if no emissions are observed, or circle “Y” if emissions are observed, or leave blank if readings cannot be taken and explain why the readings were unavailable in the comments section of the form.

If any emissions are observed, please contact the Environmental Services Department *immediately*.

RESPONSIBILITIES

Individual	Responsibility
Operators	<ul style="list-style-type: none"> Following BMP 116 at all times when completing a CAM report Monitor dust control equipment FFDC #1 & FFDC #2 associated with the Secondary Screening Plant on a daily basis to ensure FMML is operating within its permit parameters Notify Supervisors and Environmental Services of any emissions observed Ensure that the CAM form is completely and accurately filled out Submit the completed CAM form to the drop-box outside the Environmental Services Department’s Office
Environmental Services	<ul style="list-style-type: none"> Review CAM form for accuracy and maintaining CAM records Perform required Method 9 visible emission opacity readings Report deviation events to the Arizona Department of Environmental Quality

EMPLOYEE TRAINING

All personnel shall receive training and have access to this BMP when dealing with CAMs on Morenci property. Training will be provided by the Environmental Services Department.

QUESTIONS OR NEED HELP? CONTACT ENVIRONMENTAL SERVICES