



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4APT-ATMB

OCT 19 2006

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BUREAU OF AIR POLLUTION

Joseph Kahn, Acting Director
Division of Air Resource Management
FL Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Kahn:

The purpose for this letter is to provide you with a determination regarding emission limit applicability and monitoring requirements for landfill gas that will be combusted in internal combustion engines to produce electricity at the following landfills located in Florida:

Trail Ridge Landfill (Baldwin, Florida)

Brevard County Landfill (Cocoa, Florida)

Seminole County Landfill (Geneva, Florida)

These landfills are subject to 40 CFR Part 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills), and a consultant (Derenzo and Associates, Inc.) representing the owners of all three sites submitted applicability determination requests to the U.S. Environmental Protection Agency (EPA) Region 4 and to your agency. The primary question posed in these requests is whether the landfill gas processing operations at these sites constitute "treatment" as this term is defined under Subpart WWW. Based upon our review of the information provided with the applicability determination request, we concluded that the gas processing conducted at the three landfills in question does constitute treatment under Subpart WWW. Therefore, the gas leaving the treatment systems at these landfills is no longer subject to the control and monitoring requirements in Subpart WWW. Details regarding the gas processing systems at these sites and the basis for our determination are provided in the remainder of this letter.

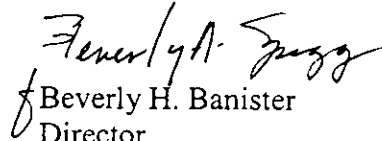
Derenzo and Associates requested a determination regarding whether the gas processing at the three landfills in Florida constitutes treatment because gas that has been treated is no longer subject to the control requirements in Subpart WWW. Under provisions in 40 CFR §60.752(b)(2)(iii), gas collected from landfills subject to Subpart WWW must be routed to either a flare, a control system that reduces nonmethane organic compound (NMOC) emissions by 98 weight-percent, an enclosed combustor, or a

treatment system that processes the gas for subsequent sale or use. If an enclosed combustor is used, NMOC emissions must be reduced by either 98 weight-percent or to a concentration of less than 20 parts per million as hexane, corrected to three percent oxygen. Although landfill gas is no longer subject to the control requirements in Subpart WWW after it has been processed for subsequent sale or use, emissions from any atmospheric vents in the treatment system must be sent to a control system (flare, enclosed combustor, etc.) that complies with the removal efficiency standards in the rule.

According to the process description that Derenzo and Associates provided with its applicability determination requests, gas collected at the three landfills in question is filtered to remove particles larger than one micron, dewatered, and compressed. According to several previous U.S. Environmental Protection Agency (EPA) determinations, a landfill gas processing operation that includes filtration to ten microns or less, dewatering, and compression constitutes treatment in accordance with provisions in 40 CFR §60.752(b)(2)(iii)(C). Since the gas processing operations at the three landfills in question include all of the steps cited in EPA's previous determinations, they constitute treatment systems for Subpart WWW purposes, and the treated gas leaving these systems will no longer be subject to control or monitoring requirements under the rule.

If you have any questions about the determination provided in this letter, please contact Mr. David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,


Beverly H. Banister
Director
Air, Pesticides and Toxics
Management Division

cc: Syed Arif
Division of Air Resource Management
FL Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Derenzo and Associates, Inc.

Environmental Consultants

September 8, 2006

Mr. Doug Neeley
Chief Air Toxics and Monitoring Branch, Region 4
U.S. ENVIRONMENTAL PROTECTION AGENCY
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

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SEP 14 2006

BUREAU OF AIR REGULATION

Subject: Brevard Energy, L.L.C.
Cocoa, Florida
Gas Treatment System Monitoring and SSM Plan

Dear Mr. Neeley:

Derenzo and Associates, Inc. is submitting to USEPA Region 4 on behalf of Brevard Energy, L.L.C. (Brevard Energy) a Gas Treatment System Monitoring and SSM Plan for its landfill gas (treated gas) electricity generation facility that will be located in Cocoa, Brevard County, Florida.

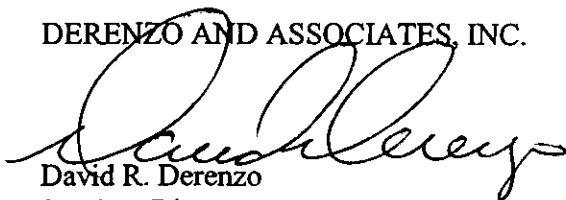
The FDEP is reviewing a PSD permit application for the construction of a landfill gas fueled electricity generation facility (Brevard Energy at the Brevard County Solid Waste Management Central Disposal Facility) and requested that the Gas Treatment System Monitoring and SSM Plan for the Brevard Energy operations be submitted to USEPA Region 4 for its review and approval.

40 CFR §60.765(d) of the MSW Landfill NSPS specifies that if a device other than an open flare or an enclosed combustor is used as the control system for landfill gas emissions, then information is to be prepared describing the operation of the control device, the operating parameters that indicate proper performance and appropriate monitoring procedures. The MSW Landfill NESHAP requires owners of affected facilities to document standard procedures for equipment startup and shutdown and develop procedures for responding to equipment malfunctions.

Please contact me if you have questions of require additional details.

Sincerely,

DERENZO AND ASSOCIATES, INC.



David R. Derenzo
Services Director

c: Bill Owen, Brevard Energy
Syed Arif, FDEP

Municipal Solid Waste Landfill Gas Collection and Control System

**Gas Treatment System Monitoring
And
Startup, Shutdown, and Malfunction Plan**

Prepared in accordance with the:

**National Emission Standards for Hazardous Air Pollutants
40 C.F.R. §63.6(e)(3)**

Prepared for:

Facility: Brevard Energy, L.L.C.

Address: Brevard Energy, L.L.C.
2250 Adamson Road
Cocoa Florida 32926

Date: September 7, 2006

This document identifies the procedures for conducting startups, shutdowns or addressing malfunctions of the landfill gas treatment system associated with the Brevard Energy, L.L.C. landfill gas to energy facility subject to this plan in a timely and safe manner.

Revision: 0
Revision Date: _____
Issuance Date: _____
Revised By: _____

1.0 Purpose

The purpose of the Gas Treatment System Monitoring and Startup, Shutdown and Malfunction (SSM) Plan that is presented in this document is to establish appropriate monitoring, operating and malfunction response procedures for the landfill gas treatment system that is operated at Brevard Energy, L.L.C. (Brevard Energy), which is located at the Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility) in Cocoa, Brevard County, Florida.

This plan has been developed in accordance with provisions of the Municipal Solid Waste (MSW) Landfill New Source Performance Standards (NSPS, 40 CFR Part 60, Subpart WWW) and the MSW Landfill National Emissions Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Part 63, Subpart AAAA).

40 CFR §60.765(d) of the MSW Landfill NSPS specifies that if a device other than an open flare or an enclosed combustor is used as the control system for landfill gas emissions, then information is to be prepared describing the operation of the control device, the operating parameters that indicate proper performance and appropriate monitoring procedures. The MSW Landfill NESHAP requires owners of affected facilities to document standard procedures for equipment startup and shutdown and develop procedures for responding to equipment malfunctions.

A copy of the up-to-date Gas Treatment System Monitoring and Startup, SSM Plan (original and subsequent revisions/addendums) will be kept on file at Brevard Energy for the entire length of time the facility is in operation.

2.0 Facility and General Process Information

Landfill gas generated at the Central Disposal Facility, which is the source of the fuel used by Brevard Energy, is collected using a system of wells, gas headers and blowers, which have been installed and are operated by the landfill owner Brevard County (Facility Identification Number (I.D. No.) 0090069. The Central Disposal Facility has been issued Title V Air Operation Permit Renewal No. 0090069-003-AV by the Florida Department of Environmental Protection, Department of Air Resource Management (FDEP-DARM), which has an expiration date of September 30, 2007.

Brevard Energy has a contract with Brevard County (Central Disposal Facility) to use the collected landfill gas for use as fuel to power six identical reciprocating internal combustion (IC) engine and electricity generator sets. The electricity that is generated by Brevard Energy is sold to Florida Power & Light under a power purchase agreement for distribution to the local grid.

The landfill gas produced by the Central Disposal Facility is treated prior to being used as

fuel in the Brevard Energy electricity generation processes. The United States Environmental Protection Agency (USEPA) has issued regulatory clarifications that define treated landfill gas as "landfill gas processed in a treatment system that filters, de-waters, and compresses the gas."

The gas received from the Central Disposal Facility is initially de-watered in knockout tanks that are located upstream of the Brevard Energy landfill gas treatment system where portions of the condensate in the landfill gas are removed.

After the initial knockout tank de-watering, the landfill gas is treated in equipment and processes operated by Brevard Energy that consists of:

1. A primary filter vessel that contains a coalescing filter, which is designed to remove particles in the gas stream that are 1.0 micron (μm) and larger. Condensate collected by this coalescing filter falls to the bottom of the vessel where it is immediately transferred by gravity feed to a sump that transfers the liquid back to the landfill for processing.
2. Gas blowers (four separate blowers) for compression of the de-watered landfill gas.
3. An air-to-gas cooler to reduce the temperature of the gas (which is heated by the blower during gas compression).
4. A polishing filter vessel that contains a coalescing filter, which is designed to remove particles that are 1.0 μm and larger. Condensate collected by this coalescing filter falls to the bottom of the vessel where it is immediately transferred by gravity feed to the sump that transfers the liquid back to the landfill for processing.

3.0 Gas Treatment System Monitoring

Based on the design of the Brevard Energy landfill gas treatment system, the following equipment and process components will be continuously monitored and manually recorded daily to verify that the system is operating properly:

- **Primary filter vessel differential pressure:** The pressure drop across the primary coalescing filter (inlet and outlet of the gas flow through the vessel) is continuously monitored with a pressure differential switch. The existence of large differential pressures (dP) indicates that the filter is wet, loaded with particulate matter or significant accumulation of condensate is present in the vessel. The dP at the primary coalescing filter (vacuum side of blower) should be equal to or less than 2 pounds per square inch differential (psid).

The primary filter typically operates without any noticeable condensate accumulation

(no water is typically present in the vessel).

If the pressure drop across the primary coalescing filter is observed to be greater than 2 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas de-watering equipment.

- **Polishing filter vessel differential pressure:** The pressure drop across the polishing coalescing filter (inlet and outlet of the gas flow through the vessel) is continuously monitored with a pressure differential switch. Large differential pressures (dP) indicate that the filter is wet or loaded with particulate matter and should be replaced. The dP at the polishing filter (pressure side of blowers and downstream of the gas cooler) should be equal to or less than 3 psid.

If the pressure drop across the polishing coalescing filter is greater than 3 psid, the filter will be replaced.

Replacement coalescing filter specifications

The replacement filters will be of comparable design for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. Brevard Energy uses LG Liquid and Gas Coalescing Cartridges that are rated for 50 psid and 30 inches in length and 3.25 inches in diameter. The filters are rated for particulate matter removal to 1.0 μm and the nominal filter area is approximately 9.6 ft^2 .

- **Blower discharge pressure (gas compression):** The pressure of the gas in the treatment system is continuously monitored with a pressure switch that is located after (downstream) of the polishing filter vessel. The landfill gas treatment system (blowers) should be operated so that the minimum pressure observed at the specified monitoring location is at least 0.5 pounds per square inch gauge (0.5 psig). Pressures measured after the polishing filter vessel that are less than 0.5 psig are an indication of problems with the gas compression system.

If the pressure of the gas in the treatment system monitored after the polishing filter vessel is less than 0.5 psig, an investigation of the equipment will be performed and corrective actions implemented.

- **Air-to-gas cooler outlet temperature:** The temperature of the gas in the treatment system is continuously monitored with a temperature switch that is located after (downstream) of the polishing filter vessel. The landfill gas treatment system (air-to-gas cooler) should be operated so that the maximum temperature observed at the specified monitoring location is equal to or less than 130°F. Gas temperatures

measured after the polishing filter vessel that are greater than 130°F are an indication of problems with the operation of the air-to-gas cooler.

If the temperature of the gas in the treatment system monitored after the polishing filter vessel is greater than 130°F, an investigation of the air-to-gas cooler will be performed and corrective actions implemented.

- **Gas Treatment System monitoring and recordkeeping:**

- Monitoring

- The pressure drop across the primary and polishing coalescing filters are each continuously monitored with separate pressure differential switches.

- The pressure of the gas in the treatment system is continuously monitored with a pressure switch located after the polishing filter vessel.

- The temperature of the gas in the treatment system is continuously monitored with a temperature switch located after the polishing filter vessel.

- If the set points (as specified in the previous text) of any of the pressure drop, pressure or temperature switches are reached, an automated system sounds an in-plant alarm (to notify on-site plant operators) and initiates a phone system that calls the on-duty operator (the plant has 24 hours per day, seven day per week coverage) during periods when an operator is not on-site.

- Recordkeeping

- The in-charge plant operator is required to maintain daily records of appropriate system operations and will manually record the times that any of the specified alarms are observed or phone call notifications of alarms are received and all appropriate gas treatment system corrective actions.

4.0 Startup Standard Operating Procedure

“Startup means the setting in operation of an affected source or portion of an affected source for any purpose.” (40 CFR §63.2)

The standard operating procedure for the startup of the landfill gas treatment system is to:

1. Ensure that no unsafe conditions are present.
2. Contact, prior to startup, the Brevard Energy in charge Plant Operator.

3. Ensure that the system is ready to start by one or more of the following:
 - a. Valves are positioned in their proper operating locations.
 - b. Appropriate gas and fluid levels, pressures and temperatures are within the values of their normal starting range.
 - c. Alarms are cleared.
 - d. Power is on, and available to the control panel and to energized equipment.
 - e. Emergency Stop is de-energized.
4. Initiate the proper equipment, process and system start sequences.
5. Observe that the system achieves normal operating ranges for appropriate gas and fluid levels, pressures and temperatures (see 3.0 Gas Treatment System Monitoring).
6. Appropriate SSM reporting forms and documents will be completed (examples are provided in Appendix A).
7. Refer to Operations and Maintenance Manuals as determined to be necessary.

5.0 Shutdown Standard Operating Procedures

“Shutdown means the cessation of an affected source or portion of an affected source or portion of an affected source for any purpose.” (40 CFR §63.2).

The standard operating procedure for shutdown of the landfill gas treatment system is to:

1. Ensure that no unsafe conditions are present.
2. Contact, prior to shutdown, the Brevard Energy in charge Plant Operator and notify appropriate Central Disposal Facility representatives that the landfill gas treatment and electricity generation processes will be shutdown.

Extended shutdowns of the specified equipment will require startup of the Central Disposal Facility gas flaring processes.

3. Initiate the proper equipment, process and system shutdown sequence by one or more of the following:
 - a. Press Emergency Stop as determined to be necessary.
 - b. Close On / Off switch(es) or Push On / Off button(s).
 - c. Close adjacent valves as determined to be necessary.
4. Observe that system achieves normal shutdown ranges for appropriate gas and

fluid levels, pressures and temperatures.

5. Complete the appropriate SSM reporting forms and documents (examples are provided in Appendix A).
6. Refer to Operations and Maintenance Manuals as determined to be necessary.

6.0 Malfunction Standard Operating Procedures

“Malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.” (40 CFR §63.2).

1. If landfill gas is determined to be venting from the gas treatment system, the equipment and processes will be immediately isolated from the Central Disposal Facility gas collection system.

Appropriate Central Disposal Facility representatives will be contacted to inform them that the gas treatment and electricity generation processes are off-line.

2. An investigation of the equipment that caused the malfunction will be performed and corrective actions implemented.
3. After the cause of the malfunction has been identified and corrective actions implemented, the fuel use and electricity generation processes will be restarted using the procedures specified in this document (Section 4.0 Startup Operating Procedures).
4. The appropriate SSM reporting forms and documents will be completed (examples are provided in Appendix A).

Duration is the time it takes from discovery of the malfunction to Step 3 specified in the preceding text (unless continuous monitoring records indicate the malfunction started earlier).

5. Refer to Operations and Maintenance Manuals as determined to be necessary.

7.0 Recordkeeping

The following information will be maintained to verify proper operation of the Brevard Energy gas treatment system and that proper procedures were implemented in response to equipment startup, shutdown and malfunction requirements:

1. Daily records of the equipment monitoring parameters that are presented in this document (Section 3.0 Gas Treatment System Monitoring).
2. Equipment maintenance and/or modification records that affect the operation of the gas treatment system.
3. Startup, shutdown and/or malfunction occurrence records with details on the duration of each event (appropriate SSM reporting forms and documents are provided in Appendix A).
4. Startup, shutdown and/or malfunction records that document the actions taken during these events, when such actions are different from those specified in this document (Section 4.0 Startup Operating Procedures, Section 5.0 Shutdown Operating Procedures, Section 6.0 Malfunction Operating Procedures).

A deviation report will be completed when startup, shutdown and/or malfunction actions occur that are different than those specified in this document (an example is provided in Appendix B).

8.0 Plan Revisions

This Gas Treatment System Monitoring and SSM Plan will be:

1. Amended or modified if equipment or processes are added that are not covered under the Plan; or
2. Revised within 45 days of a nonconforming event if the procedures described in the document do not adequately address any startup, shutdown and/or malfunction event that occur at the facility.

Plan revisions will be documented using the revision history log (an example is provided in Appendix C).

9.0 Appendices

The following documents and materials are included as part of the Gas Treatment System Monitoring and SSM Plan:

Appendix A: Startup / Shutdown / Malfunction Report Form

Appendix B: Startup / Shutdown / Malfunction Plan Deviation Report

Appendix C: Gas Treatment System Monitoring and SSM Plan Revision History

APPENDIX A

Startup / Shutdown / Malfunction Report Forms and Documents

Startup/Shutdown/Malfunction Report Form

Section 1 - All Events

List all affected piece(s) of equipment:						
Type of Event	Military Time		Duration (hours)	Event Code (see back of form)	SOP* Followed?	
	Date/Time Start	Date/Time End			Yes	No**
<input type="checkbox"/> Startup						
<input type="checkbox"/> Shutdown						
<input type="checkbox"/> Malfunction					Complete Section 2 Below	

* Standard Operating Procedure (SOP) for Flare Startups (Manual & Automatic) and Shutdowns are provided in SSM Plan
 **If SOP in SSM Plan was not followed, notify personnel on contact list immediately.

Section 2 - Malfunction Events Only

Step	Corrective Action Procedures for All Malfunctions	☑ Check one of the following for each step:	
		Procedure completed	Procedure Not Applicable
1.	Determine if landfill gas is being released to the air (can you smell landfill gas, or measure/detect gas flow?).	<input type="checkbox"/>	
2.	If landfill gas is being released to the air, notify personnel on "Contact List".	<input type="checkbox"/>	<input type="checkbox"/>
3.	Determine if the malfunction is causing an unsafe operating condition (air entering landfill or piping, smoking, vibration, or other problem), which may harm people, the environment or the landfill gas control equipment.	<input type="checkbox"/>	
4.	If unsafe operating condition exists, or landfill gas is being released to the air, stop (if possible) landfill gas flow.	<input type="checkbox"/>	<input type="checkbox"/>
5.	If Control device or other system component is shutdown due to Step 4, follow Shutdown SOP and Complete Section 1 - "Shutdown".	<input type="checkbox"/>	<input type="checkbox"/>
6.	Determine if other personnel/resource (qualified technician, electrician, consultant or other) are needed for malfunction diagnosis.	<input type="checkbox"/>	
7.	If additional personnel needed, notify qualified personnel: ? Record Contact Name: ? Record Contact Date: ? Record Contact Time: ? Contact site representative with information recorded here.	<input type="checkbox"/>	<input type="checkbox"/>
8.	Start malfunction diagnosis.	<input type="checkbox"/>	
9.	Determine if other resources are needed to fix the malfunction (qualified technician, electrician, contractor, on-site resources, manufacturer's representative, or other).	<input type="checkbox"/>	
10.	If additional resources needed, contact qualified resource: ? Record Contact Name: ? Record Contact Date: ? Record Contact Time: ? Contact site representative with information recorded here.	<input type="checkbox"/>	<input type="checkbox"/>
11.	Fix the malfunction.	<input type="checkbox"/>	
12.	Once the malfunction is fixed, re-start the system per SOP if it had been shut down, and record start-up times and dates in Section 1 of this form.	<input type="checkbox"/>	<input type="checkbox"/>
13.	Record date that malfunction occurred, date that malfunction was repaired, and total time that system was out of service in Section 1 of this form.	<input type="checkbox"/>	
14.	Sign this form and place it in the Start-up, Shutdown, Malfunction file.	<input type="checkbox"/>	
15.	If the procedures listed above were not followed, notify personnel on contact list immediately.	<input type="checkbox"/>	<input type="checkbox"/>

Date Form Filled Out: _____ Signature: _____

Event Codes

For Start-ups and Shutdowns

Startup: *The setting in operation of an affected source or portion of an affected source for any purpose.*

Shutdown: *The cessation of operation of an affected source or portion of any source for any purpose.*

<u>Code</u>	<u>Event</u>
1	Maintenance
2	Suspected Collection System Malfunction
3	Suspected Control Device Malfunction
4	Suspected Continuous Monitoring System Malfunction (Temperature/Flow/Other)
5	Training
6	Gas System Construction/Expansion
7	Normal Backup Operation
99	Other(Describe)

For Malfunctions

Malfunction: *Any sudden, infrequent and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.*

<u>Code</u>	<u>Event</u>
10	Automatic shutdown of control device by designed protective systems
11	Autodialer Callout
12	Shutdown alarms that result in the device not shutting down
13	Unalarmed shutdown
14	Control Device Smoking
15	Inspection identified malfunction
16	Loss of power - utility down
17	Loss of power - unknown
18	Damaged Well, Header or Lateral Piping
19	Leaks at wellheads, valves, flanges, test ports, seals, couplings, etc.
20	Condensate Knock-out Problems
21	Collection Piping Blockages
22	Problems due to Settlement
23	Loss of phase
24	Blower overload condition
25	Blower bearing failure
26	Broken belts (if belt-drive) or broken coupling (if direct-drive) in blower
27	Continuous Monitoring System Malfunction - Thermocouple
28	Continuous Monitoring System Malfunction - UV Scanner
29	Continuous Monitoring System Malfunction - Flow Monitor
30	Continuous Monitoring System Malfunction - Flow Recorder
31	Continuous Monitoring System Malfunction - Temperature Recorder
32	Act of God (i.e., lightning, wind, etc.)
99	Other(Describe)

APPENDIX B

Startup / Shutdown / Malfunction Plan Deviation Report

Startup, Shutdown, and Malfunction Plan Deviation Report

Facility: _____ Date Form Completed: _____

Unit ID: _____

Event: *check the appropriate box.*

Startup Shutdown Malfunction

Date: _____ Time: _____

Duration: _____

Provide detailed explanation of the circumstance of the startup, shutdown, malfunction:

Provide description of corrective action:

Describe the reasons the Startup, Shutdown, Malfunction Plan was not adequate:

Describe proposed revisions to the Startup, Shutdown, Malfunction Plan:

Were any excess emissions and/ or parameter monitoring exceedances believed to have occurred during the event?
 check the appropriate box.

Yes No

Name: _____

Title: _____

Signature: _____

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Sample Semiannual Report Letter
(All SSM Events in Compliance with the SSM Plan)

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Date

Air Agency Address

RE: Semiannual Startup, Shutdown, Malfunction (SSM) Plan Report
XXXXXX Landfill
Facility Title V Operating Permit No.
Reporting Period: _____ to _____

Dear _____:

The XXXXXX Landfill is subject to the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (Landfill NESHAP – 40 CFR 63 Subpart AAAA). The NESHAP requires that a report be submitted on a semiannual basis, a report be submitted to the Administrator discussing the facility's compliance with the procedures in their SSM Plan, during SSM events (40 CFR 63.10(d)(5)).

The actions taken at the facility during all SSM events, for the reporting period listed above, were consistent with the procedures listed in the SSM Plan at the facility.

During the reporting period listed above, there (were/were not any) revisions made to the SSM Plan at the facility. (If changes were made, state why – revised to reflect new equipment, new contact numbers, etc.).

If you have any questions regarding this Semiannual SSM Plan Report, please contact me at (List Phone Number).

Sincerely,

XXXXXXXXXXXXXXXXXX
(NAME OF COMPANY/TITLE HERE)

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Sample Semiannual Report Letter
(One or more SSM Events NOT in Compliance with the SSM Plan)

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Date

Air Agency Address

RE: Semiannual Startup, Shutdown, Malfunction (SSM) Plan Report
XXXXXXXXXX Landfill
Facility Title V Operating Permit No.
Reporting Period: _____ to _____

Dear _____:

The Facility Name Landfill is subject to the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (Landfill NESHAP – 40 CFR 63 Subpart AAAA). The NESHAP requires that a report be submitted on a semiannual basis, a report be submitted to the Administrator discussing the facility’s compliance with the procedures in their SSM Plan, during SSM events (40 CFR 63.10(d)(5)).

The actions taken at the facility during one or more SSM events, for the reporting period listed above, were not consistent with the procedures listed in the SSM Plan at the facility. However, the source did not exceed any of the emissions limitations in the Landfill NESHAP during these events. The attached table lists the information that must be submitted in the Semiannual SSM Plan Report in this instance.

During the reporting period listed above, there were ____ revisions made to the SSM Plan at the facility. (If changes were made, state why – revised to reflect new procedures to address non conforming event (mandatory), new equipment, new contact numbers, etc.).

If you have any questions regarding this Semiannual SSM Plan Report, please contact me at (List Phone Number).

Sincerely,

XXXXXXXXXX
(NAME OF COMPANY/TITLE HERE)

Attachment: Description of all Malfunction Events

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Attachment 1:
Description of all Malfunction Events
For the Reporting Period _____ to _____

Total Number of Malfunctions: _____

Date of Malfunction	Total Duration (hours)	Equipment Affected*	Description of Malfunction	Were SSM Plan Procedures Followed (Y/N)	Date of SSM Plan Revision to Address Event**

* Control Device, Continuous Monitoring System, or Collection System
**Not Applicable if SSM Plan Procedures were followed during the Malfunction Event

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Sample Immediate Notification Letter
(SSM Events NOT in Compliance with the SSM Plan, and Facility Experienced
Excess Emissions)

Brevard Energy

Startup, Shutdown, and Malfunction Plan

Date

Air Agency Address

RE: XXXXXXXX Landfill
Facility Title V Operating Permit No.
40 CFR 63 Subpart AAAAA – Landfill NESHAP
Immediate Notification Report: Non-conforming SSM Event

Dear _____:

The XXXXXXXX Landfill is subject to the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (Landfill NESHAP – 40 CFR 63 Subpart AAAAA). 40 CFR 63.10(d)(5) of the NESHAP requires that if actions taken at the facility during a startup, shutdown or malfunction (SSM) event are not consistent with the facility's SSM Plan, and the event results in excess emissions, the Agency must be notified verbally within 2 working days after the actions are taken. A letter must be written within 7 days of the event.

Please consider this letter as the required written report for the SSM event that occurred at the facility on (list date). As required by the NESHAP, a verbal notification was made to (give name of agency, person talked to) on (list date).

In accordance with the NESHAP, the following information is required in the letter report for this event:

Record the actions taken for the event: Describe what occurred, what was done, and how it differed from the SSM plan actions.

Describe excess emissions: Discuss the type of emission, and where it came from

Revise the SSM plan within 45 days of the non-conforming event:

Give a date by which the SSM plan will be revised.

If you have any questions regarding this Immediate Notification Report, please contact me at (List Phone Number).

Sincerely,

XXXXXXXXXX
(NAME OF COMPANY HERE)

APPENDIX C

**Gas Treatment System Monitoring
And
SSM Plan Revision History**

Brevard Energy

Startup, Shutdown, and Malfunction Plan

SSM Plan Revision History

This SSM Plan will be amended if equipment or processes are added that are not covered under the plan or will be revised within 45 days of non-conforming events if the procedures described herein do not adequately address any malfunction or start-up/shutdown events that occur at the facility. A copy of the original plan and all revisions/addendums will be kept on file at the facility for at least five (5) years.

Date of Revision	Reason For Revision