

MONTENAY POWER CORP.



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AIR REGULATION

May 6, 1999

Mr. Hamilton S. Owen
Administrator, Siting Coordination Office
Florida Dept. of Environmental Protection
2699 Blair Stone Road
Tallahassee, FL 32399-2400

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

MAY 07 1999

SITING COORDINATION

**Re: Dade County Resources Recovery Facility
Case Number PA 77-08
Conditions of Certification**

Dear Mr. Owen:

In accordance with F.A.C Rule 17-297, on February 9, 1999, Montenay is submitting the attached VOC and various visible emissions test protocol for the new Air Quality Control System being installed at the facility.

A test protocol, for the other parameter, from ABB, has been already submitted to your department back in February 1999, but didn't include the VOC and visible emission for the ash silo baghouse, the lime silo baghouse and loading operation, the carbon injection silo baghouse test, which will be performed by a different company right after the ABB test.

Test methods for VOC are in accordance with EPA methods 1-4, 9 and 25A.

Sincerely,

David Lukacie
Environmental Engineer

Attachments:

Test protocol

cc: P. Wong, DERM
T. Long, FDEP West palm Beach
W. Uchdorf, MDCSWM

A. Lue, MIC
F. Screve, MPC
T. Thornton, MPI



South Florida Environmental Services

April 5, 1999

Mr. David Lukacie
Montenay Power Corp.
6990 NW 97th Ave.
Miami, FL 33178

**RE: Total Hydrocarbons, Flow rate, Moisture, and Visible Emissions Waste to
Energy Facility – EPA Methods 1-4, 9, 25A
SFES Proposal No. 99-526**

Dear Mr. Lukacie:

South Florida Environmental Services a Division of Eastmount Environmental, is pleased to submit our Proposal No. 99-526 to provide Compliance Testing for Total Hydrocarbons, Flow rate, Moisture, and Visible Emissions for your Waste to Energy facility located in Miami Fl. Hydrocarbon and flow rate testing will be conducted on the 4 gas flues at the facility. Visible Emissions will be conducted on the Dust Master fly ash system, lime silo loading system, Mercury reduction bag house system, and the biomass ash silo bag house system.

The attached cost proposal is in accordance with the test methods, analytical procedures and guidelines required by the Florida Department of Environmental Protection (FDEP). This submittal summarizes the Scope of Work, level of effort and presents the estimated cost associated with conducting the project, as defined.

We appreciate the opportunity to provide Montenay Power Corp with this cost proposal and look forward to the possibility of providing you with our emissions sampling and analytical services.

If you have any questions or require any additional information regarding this cost proposal, please do not hesitate to call.

Sincerely,
South Florida Environmental Services,

Michael Mercadante
Manager, Technical Operations

**Montenay Power Corp
Compliance Testing****Scope of Work:**

All testing and data reduction will be performed in accordance with EPA Methods 1-4, 9 and 25A as found in 40 CFR 60 Appendix A, as amended. A final report will be generated and submitted to you as well as the Florida Department of Environmental Protection in West Palm Beach within forty-five (45) days of completion of testing.

Cost:

The total cost to perform the above program will be [REDACTED]. All work will be performed on a fixed price basis in accordance with the attached General Parameters. Any work conducted outside the scope as written and/or due to on-site delays not attributable to South Florida Environmental Services will be invoiced in accordance with the rates, terms, and conditions of the attached General Parameters.

Client Responsibility:

Montenay Power Corp will be responsible for the following:

- ◆ Safe access to the sample port locations.
- ◆ One 480V, 50A three phase circuit
- ◆ At least two separate 110V, 20A circuits at the test location
- ◆ Plant processing data
- ◆ Coordination between testing personnel and plant operations

Conditions of Engagement:

South Florida Environmental Services proposes to perform the services described herein in accordance with the General Parameters attached. Billing for the services will be based on the fixed price included herein. Invoices will be submitted every thirty days covering the work performed. This proposal is valid for thirty days.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

March 23, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vicente Castro, Assistant Director
Technical Services
Department of Solid Waste Management
8675 Northwest 53rd Street, Suite 201
Miami, Florida 33166

Re: DEP File No. PSD-FL-006 (A) and PA 77-08
Dade County Resource Recovery Facility (Units 1-4)
Montenay's letter dated March 5, 1999

Dear Mr. Castro:

The Department has reviewed Montenay's letter dated March 5 requesting that we provide you with our understanding regarding the purpose of emissions tests planned for the summer of 1999 at the Dade County Resource Recovery Facility.

The first matter related to the methods for testing a number of pollutants. We sent a permit modification to you on March 22 approving practically all of the requested changes. These are mostly related to the use of methods consistent with 40CFR60 Subpart Cb, Emissions Guidelines and Compliance Schedules for Municipal Waste Combustors.

Montenay requests that the Department confirm the "phased approach" towards compliance with the requirements of Subpart Cb. This is acceptable in principle. According to the State Schedule to implement Subpart Cb, the facility must comply by November 13, 2000. The tests to be conducted this summer will demonstrate compliance with Subpart Cb except for carbon monoxide (CO) and nitrogen oxides (NO_x).

Please note that the units are already subject to the requirements of Reasonable Available Control Technology (RACT) for sources in (previously) ozone non-attainment areas. KBM submitted an application for RACT-on-NO_x in March 1993. The requested value of 0.5 pounds per million Btu heat input was based on the performance capabilities of the unit before the on-going retrofit project. It was incorporated into the PSD permit and site certification modifications issued in 1994 for the on-going retrofit project. Therefore the NO_x stack test can be used to demonstrate compliance with the RACT requirement, which is less stringent than the Subpart Cb limit for NO_x.

Please note as well that Title V fees are generally paid on emissions with limits expressed in existing permits. According to our records, the County did not pay Title V fees for NO_x emissions last year. Please contact Scott Sheplak (850/921-9532) of the Title V Section to determine whether or not any fees are actually due this year (or from previous years).

Regarding the final matter in the requests, the Department accepts the proposed method to monitor gas usage. Should you have any questions in this matter, please free to call Ms. Teresa Heron at 850/921-9529.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. A. Linero", followed by the date "3/23".

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/aal

Enclosure

cc: D. Anetha Lue, P.E, MIC
Scott Sheplak
Tom Tittle, DEP SED
Jim Pennington, DEP
Buck Oven, PPSC

2.3.2 FUTURE MAXIMUM NO_x EMISSIONS

Future maximum NO_x emissions for the existing units, both prior to and after retrofit, are based on the current operation of the DCRRF units. Stack test data have indicated that the current emissions average about 0.40 lb/MMBtu. A frequency distribution plot of the NO_x test data is presented in Figure 2-4. As indicated, the expected maximum NO_x emission rate is approximately 0.50 lb/MMBtu. Based on the test data, the proposed future limit for Units 1—4 is 0.50 lb/MMBtu, which reflects a level that can be met reasonably on a routine basis. Further justification for this proposed RACT limit is presented in Section 4.0. Resulting emissions are presented in Table 2-6.