



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

Certified Mail -- Return Receipt Requested

June 12, 2006

Mr. Tom Morello
Facility Manager and Responsible Official
Montenay Power Corporation
6990 NW 97th Avenue
Miami, Florida 33178

Mr. Lee Casey
Department of Solid Waste Management
Miami-Dade County
2525 N.W. 62nd Street, 5th Floor
Miami, Florida 33147

Re: Draft Air Construction Permit No. **0250348-006-AC**
DRAFT Title V Air Operation Permit Renewal No. **0250348-007-AV**
Miami-Dade County Resource Recovery Facility

Dear Messrs. Morello and Casey:

Thank you for your response received on May 22, 2006, to our request for additional information concerning the subject permit applications. However, we must deem your applications still *incomplete*, because we need further clarification relative to the following items:

1. CAM Applicability for Particulate Matter and Lead

Your recent letter proposed raising the permit limits for particulate matter (PM and PM₁₀) and lead (Pb) to equal the limits in the corresponding 40 CFR 60 Subpart Cb regulation, and therefore become exempt from CAM for these pollutants. See the table below.

Pollutant	Basis of Limit	Limit	Increase in PTE
PM/PM ₁₀	PSD-FL-006	0.011 gr/dscf	
	Subpart Cb	27 mg/dscm (0.0118 gr/dscf)	26.2
	Subpart Cb (4/28/09)	25 mg/dscm	15.7
Lead	PSD-FL-006	380 µg/dscm	
	Subpart Cb	440 µg/dscm	0.56
	Subpart Cb (4/28/09)	400 µg/dscm	0.35

The limits, even if adjusted, would not avoid the need for a CAM plan. A CAM plan is therefore required for PM/PM₁₀ and Pb. Historical annual operating report (AOR) data reveals that the facility has been emitting these pollutants at levels significantly below the permit limits.

"More Protection, Less Process"

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As an illustration, please see the attached example CAM plan for Pb, specific for your facility. This example includes the following justification language:

Emission limiting standards written subsequent to the 1990 Clean Air Act Amendments (November 15, 1990) presumptively contain minimum compliance assurance monitoring (CAM) to ensure continuous compliance. Accordingly, pollutants regulated by such standards are exempt from requirements to develop a CAM plan. The Pb emission limiting standard of 40 CFR 60, Subpart Cb mandates a compliance demonstration approach of annual stack testing. The presumptive CAM was used as a basis for this CAM Plan. The Pb emission limiting standard established by PSD-FL-006(D) is more stringent than the post-1990 Pb NSPS standard. The historical actual emissions are significantly less than the standard at a level less than 5%. Based on a review of the historical actual emissions data, the Pb monitoring requirements of 40 CFR 60, Subpart Cb, are proposed as CAM for the PSD-FL-006(D) Pb limitation.

The federal MWC standards are revisited every 5 years. The presumptively minimum CAM used for this CAM Plan shall be revisited at the time of renewal.

2. Carbon Monoxide (CO) Limit

Your e-mail memorandum dated May 22, 2006, (via Dave Buff of Golder Associates), and attached spreadsheet contained the request to realign the CO limit in the Title V permit to the proposed new Cb limit of 250 ppmvd. The Department requires an air construction permit application to consider this request, as discussed with Mr. Buff and Ms. Anetha Lue. The application can be processed simultaneously with the present Title V Operation Renewal Permit Application.

3. Hydrogen Chloride Limit

The spreadsheet attached to Golder Associates' letter dated October 14, 2005, lists the permitted limit for HCl as 29 ppmvd. We believe that the correct limit is 25 ppmvd. Because the permit limit is more stringent than the Cb limit, a CAM applicability analysis is required.

4. Dioxins/Furans Limit

Although it appears that the permit limit of 30 ng/dscm is equivalent to the Cb limit, the permit also contains a limit of 0.000038 ton/year. Please demonstrate that this additional limit is equal to or less stringent than the Cb limit.

5. Sulfur Dioxide Limit

The permit contains a limit of 214.2 tons/year in addition to the Cb limit. Please demonstrate that this additional limit is equal to or less stringent than the Cb limit.

6. Nitrogen Oxides Limit

The permit contains a limit of 614.9 tons/year in addition to the Cb limit. Please demonstrate that this additional limit is equal to or less stringent than the Cb limit.

7. PM Limit for Silos

Please provide the calculations that show that the uncontrolled emissions from the ash, lime storage, and activated carbon silos are less than 100 tons per year, and therefore exempt from CAM.

8. Warm-up Period Data

Our letter dated February 8, 2006, contained the following request, but this information has not been provided. Without this information, we have no basis for granting the requested permit changes.

In the requested changes to Specific Condition B.45., you have defined a "warm-up period" with unlimited duration and with emissions to be excluded from emission limitations. You noted in your recent letters that you were not able to provide the requested probability distribution describing such periods, and corresponding emissions data. However, you did provide a limited amount of data based on a small sample. In your recent response, referenced above, you request a revision to the original application for this project that redefines the commencement of startup and shutdown periods (that now includes the parameter value of "13.5% flue gas oxygen"). In addition, you have asked to include the following language in the specific condition:

"(5) During warm-up, the refuse derived fuel (RDF) shall be fired in the unit for a period of no longer than 2 hours, while propane shall be used for longer periods in order to protect the equipment from damage and operate the unit consistent with manufacturer's instructions [as specified in (6) of this condition].

(6) During a routine warm-up event, propane shall be used for a maximum period of 6 hours. During non-routine warm-up events, propane shall be used for a maximum of 20 hours."

Although you propose a limit on the refuse derived fuel segment (i.e., 2 hours), it is important that we have (1) some information on the probability distribution of defined warm-up periods, (2) an estimate the potential to emit pollutants during such periods, and (3) the relationship to possible data exclusion strategies employed.

When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Mr. Tom Morello
Montenay Power Corporation
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Mr. Lee Casey
Department of Solid Waste Management

Sincerely,

A handwritten signature in black ink, appearing to read 'A. A. Linero', with a stylized flourish at the end.

A. A. Linero, P.E.
Program Administrator
Permitting South Section

Attachment: Example CAM Plan for Lead

Cc: Kathleen Woods-Richardson, Miami-Dade Department of Solid Waste Management
Darrel Graziani, P.E., Southeast District Office
David Buff, P.E., Golder Associates, Inc.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <i>Caroline</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Caroline</i> C. Date of Delivery <i>6/15/02</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
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<p>2. Article Number (Transfer from service label)</p> <p>7005 1160 0004 3034 4554</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>			

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
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Total Postage & Fees \$	
<p>Sent To</p> <p>Mr. Tom Morrelo, Plant Manager and R.O. Street, Apt. No. or PO Box No. 6990 NW 97th Avenue City, State, ZIP+4 Miami, Florida 33178</p>	
PS Form 3800, June 2002 See Reverse for Instructions	

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<p>1. Article Addressed to:</p> <p>Mr. Lee Casey Department of Solid Waste Management Miami-Dade County 2525 N.W. 62nd Street, 5th Floor Miami, Florida 33147</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7005 1160 0004 3034 4547</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
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PS Form 3800, June 2002 See Reverse for Instructions	

Example CAM Plan

Compliance Assurance Monitoring Plan

Lead (Pb) Emissions

Baghouse for Control of Pb Emissions

Facility: Miami-Dade Resource Recovery Facility

I. Background

A. Emissions Unit (EU):

Description: Municipal Waste Combustion Units
Identification: EU No. 1, 2, 3, and 4
Facility: Miami-Dade Resource Recovery Facility

B. Applicable Regulation, Emission Limit, and Monitoring Requirements:

Regulation No.: PSD-FL-006(D), air construction permit and
Federal Emissions Guidelines (EG) 40 CFR
60 Subpart Cb
(more stringent limit/guideline applies)
Emission Limit: 0.380 mg/dscm (PSD Limit)
0.440 mg/dscm (Federal EG)
Monitoring Requirement: Annual Stack Test – EPA Method 29 for
determination of multi-metals

C. Control Technology:

Baghouse

II. Monitoring Approach

The key elements of the monitoring approach are presented below:

A. Indicator

Lead concentration as determined by annual stack testing will be used as an indicator. (40 CFR 60 Subpart Cb)

CAM Plan

B. Measurement Approach

Testing shall be performed in accordance with the requirements of Specific Condition **B.56.** of the facility's Title V permit.

C. Indicator Range

The emission limit for lead contained in the gases discharged to the atmosphere is 0.380 milligrams per dry standard cubic meter, corrected to 7 percent oxygen. (40 CFR 60.33.b(a)(4))

D. QIP Threshold / Performance Criteria

Test Procedures are performed in strict accordance with the EPA Method 29 found in the Code of Federal Regulations (40 CFR 60) Appendix A.

III. Justification

Emission limiting standards written subsequent to the 1990 Clean Air Act Amendments (November 15, 1990) presumptively contain minimum compliance assurance monitoring (CAM) to ensure continuous compliance. Accordingly, pollutants regulated by such standards are exempt from requirements to develop a CAM plan. The Pb emission limiting standard of 40 CFR 60, Subpart Cb mandates a compliance demonstration approach of annual stack testing. The presumptive CAM was used as a basis for this CAM Plan. The Pb emission limiting standard established by PSD-FL-006(D) is more stringent than the post-1990 Pb NSPS standard. The historical actual emissions are significantly less than the standard at a level less than 5%. Based on a review of the historical actual emissions data, the Pb monitoring requirements of 40 CFR 60, Subpart Cb, are proposed as CAM for the PSD-FL-006(D) Pb limitation.

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