MONTENAY POWER CORP.

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December 22, 2005

Kevin R. Neal
Florida Department of Environmental Protection
Southeast District
400 N. Congress Avenue, Suite 200
West Palm Beach, FL 33401

RE: Settlement by Consent Order in the case of State of Florida Department of Environmental Protection vs. Montenay Power Corp.
Facility ID No.: 0250348
OGC File No.: 05-1530

Dear Mr. Neal:

Enclosed please find a copy of the Visible Emissions Reduction Plan developed by Montenay Power Corp. for the Miami-Dade County Resources Recovery Facility. This Plan was developed in accordance to paragraph 14 of the recently executed Consent Order (OGC File No.: 05-1530).

If you have any questions or would like to discuss this Plan further, please feel free to contact our office.

Sincerely,

TMorello

Tom Morello
Plant Manager

CC:

G. Aleman – MPC
L. Casey - DSWM
G. Marcusa – MPC
W. Urchdorf – DSWM
A. Lue – MPC
D. Graziani – FDEP
C. Neu – MPC

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Montenay Power Corp.

VISIBLE EMISSIONS REDUCTION PLAN

DECEMBER 2005

Miami – Dade County Resources Recovery Facility

I) Background:

Montenay Power Corp. (MPC) experienced several bag failures in the baghouse compartments of Boiler 2 between the months of August through October 2004. As a result of these bag failures, there were opacity exceedences of the permit limit and ultimately enforcement by the Florida Department of Environmental Protection (FDEP) by means of a Consent Order dated 11/28/05.

This Consent Order required MPC to prepare a Visible Emissions Reduction Plan that identifies the preventative measures that it will under take to minimize opacity excursions. As a minimum, the plan shall:

(a) Identify operating parameters (e.g., opacity, pressure drop, etc.) and action levels that will be monitored for purposes of reducing opacity excursions.

(b) Identify the operating procedures to be implemented when an operating parameter approaches an identified action level.

MPC has since made some modifications to its operating parameters and procedures that it feels meets the requirements of the Consent Order and are presented in this Plan.

II) Operating Procedures:

According to the facility's Title V Air Permit, the Opacity must not exceed 10% for a 6-minute average. As a preventative measure, the facility's Continuous Emissions Monitoring System's (CEMS) Data Acquisition Handling System (DAHS) is programmed to show alarms at different opacity set points below the permit limit. These set points depict when there is an increase in opacity, which can either be gradual or sudden depending on the cause.

When the alarm is triggered, the operator will begin to take corrective actions to determine the possible cause of the elevated readings. He will begin to isolate compartments in the baghouse to determine if there is a difference in the opacity readings. If by isolating a compartment there is a difference in opacity, then that compartment will remain isolated until repairs can be completed.

If the cause of the opacity increase is determined to be an opacity monitor malfunction, it will count against the monitor downtime for the quarter. If the cause is determined to be a malfunction of the filter bags or components, then it will be counted as an exceedence if the 6-minute average is above the 10% limit. In this event, the Air Emissions Immediate Notification log must be sent to FDEP within 24-hrs or the next business day via fax.

If the opacity reaches 8% or higher at any time during his investigation, the boiler will be immediately shut down and the compartments will be manually checked for damaged bags.

MPC previously submitted the operating procedures for opacity control to FDEP – See Attachment "PH-Environmental Procedure Opacity Excursion". These procedures have been revised as follows:

- The operator will begin to take corrective actions when the opacity has a sudden or gradual increase of more than 1% or when the opacity reaches 3% instead of 5%.
- Additional alarm set points have been programmed into the CEMS to alert the operator when opacity increases.
- The frequency of training operators in the opacity excursion procedure will be changed from yearly to semi-annually.

III) Maintenance Procedures:

MPC currently has an extensive maintenance program, which covers the entire facility. Some of these maintenance procedures, which have a direct impact on opacity, are as follows:

- Each of the baghouse compartments is inspected annually by either MPC personnel or an independent contractor to determine overall conditions of internal components.
- If at any time the facility determines that the conditions of the filter bags in the baghouses are no longer providing adequate or reliable opacity reduction, the facility schedules a replacement of the filter bags as needed.
- Preventative maintenance is conducted as recommended by the manufacturer. Records of these maintenance activities are maintained.

In an effort to reduce opacity excursions, additional maintenance procedures have been implemented:

- The cleaning cycle settling time was increased to ensure ample time for the ash from the filter bags to be pulled out of the hopper. By increasing the settling time after a cleaning cycle is performed, the likelihood that ash collected in the hopper will drawn out of the stack will be reduced in the event that there is a damaged filter bag when the compartment is reinstated
- The material of the clamps that secure the filter bags will be replaced with corrosion resistant clamps. By changing the material of the clamps, premature failure due to corrosion will be prevented.

IV) Training:

Currently the operators are trained annually on all emergency response procedures, which include opacity excursion response. The operators will also be trained on the changes in the procedures as well. As an additional improvement, the training frequency will be increased to semi-annually instead of annually.

IV) Review:

All of the above mentioned procedural and operational improvements will be evaluated to determine its effectiveness in reducing opacity excursions. As part of the facility's Environmental Management System (EMS) all operating and maintenance procedures are periodically reviewed for effectiveness and modified as needed. The modification highlighted in this Plan will also undergo an evaluation to determine its effectiveness.

MONTENAY POWER CORP.

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PH-ENVIRONMENTAL PROCEDURE
OPACITY EXCURSION

Written by:
James Pennebaker

I. PURPOSE

The purpose of this procedure is to provide a guideline for **responding and answering to an opacity excursion** and to a **monitor malfunction**.

Our actual air permit (PSD-FL-OO6) limits our opacity at a maximum limit of 10% per 6-minutes average period, and also requires that we continuously monitor our opacity.

In order to control the particulate emission from our stacks, baghouses, with 10 separate cells, have been installed on each of the units. Opacity monitors also have been installed in each flue (at the stack, elevation 100 feet). Individual Programmable Logic Controllers (PLCs) control the (4) CEMS/COMS for the facility. The PLC transmits data to a Data Acquisition Handling System (DAHS).

The operator can read instantaneous opacity readings on each of the unit on the CEMS screens in his control room and can also generate reports at any time. The analyzers and the DAHS server are located in the CEMS trailer.

A daily calibration is automatically done on the opacity monitor. This calibration has to pass in order to meet the monitoring requirements

The main goal is to take any preventive action to avoid any opacity excursion above 10%, and any monitor downtime above 1 hour.

II. DEFINITIONS

CEMS: Continuous Emission Monitoring System
COMS: Continuous Opacity Monitoring System
DAHS: Data Acquisition Handling System

III. PROCEDURE

A. Respond to an Opacity Excursion

If Control Room operator gets any reading above 3%, it may mean:

1. One or more bags in the baghouse are cracked/damaged.
2. There is dirt and/or fogging on the monitor lens (generally when boiler restarts after a shutdown period). In this case, it is not an exceedance, but a Monitor Malfunction (refer to **B.** *Respond to an Opacity Monitor Malfunction*)

The operator will stop feeding fuel to the boiler immediately if opacity reaches 8%, and if it is not caused by dust/fogging on opacity mirror.

(See Flowchart "***Opacity Excursion Response***")

B. Respond to an Opacity Monitor Downtime

We are required to continuously monitor and record the opacity on each boiler when it is on line (steam flow above 70,000 lbs./hr and burning of RDF).

If the control room operator does not get any opacity signal on his screen or gets an alarm from CEMS, it may be caused by:

- Opacity monitor equipment failure at the stack itself
- Hardware failure (lost of signal from stack to CEMS and/or to Control room)
- Software failure (DAHS system down)
- False signal (dust, or fogging on the mirror which false the reading)
- Calibration failure (data not valid, considered as downtime)

If the opacity monitor is down for more than 24 hours, the boiler must be shutdown and FDEP notified within 24 hours.

As an operational practice, the monitor downtime should never exceed two hours duration per day. The boiler will be shut down otherwise.

If the Monitor Malfunction exceeds 24 hours, FDEP and Dade County must be notified immediately (use the Air Emission Notification Log sheet to record notification).

If procedure properly followed (downtime < 2 hours), no notification to FDEP or Dade County will be required.

(See Flowchart "***Opacity Monitor Malfunction Response***")

IV. POSITIONS TO BE TRAINED ON THE PROCEDURE

See job requirements in the Pilgrim software

V. REFERENCES

Emissions and Monitoring Requirements:
Permit COC PA 77-08
Rule FAC 62-297
Rule FAC 62-210.700
40 CFR 60.13
40 CFR 60.58a
40 CFR 60, Appendix B 40 CFR 60, Appendix F

Contact for Notification:
FDEP West palm Beach
Raisa Neginski or Darrel Graziani
Phone: (561) 681-6600 Fax: (561) 681-6790

Dade County
Lee Casey
Phone: (305) 514-6672 Fax: (305) 514-6874

VI. ATTACHMENTS

Opacity Excursion Response Flowchart

Opacity Monitor Malfunction Response Flowchart

Air Emission Immediate Notification Log sheet

Opacity Excursion Response

Opacity Monitor Malfunction Response