

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY

OPERATING PERMIT
(Revised 6/20/00)

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

Permit No.	OP-46-0010A	Source(s)	Two (2) Mass Burn Type Municipal Waste Incinerators
Owner	Montenay Montgomery Limited Partnership	Air	
Address	Montenay Energy Resources of Montgomery County, Inc. 1155 Conshohocken Road Conshohocken, PA 19428	Cleaning	
Attention	Mr. Jay Lehr Plant Manager	Device	
		Location	1155 Conshohocken Road Plymouth Township Montgomery County

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any applicable plan approvals issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the Rules and Regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 04/20/1999

Expires 04/20/2004


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (SMC97)154-3

AMENDED

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED);

3. This operating permit includes the Department's determination of Reasonably Available Control Technology for the following nitrogen oxides emitting sources as required by 25 Pa. Code Sections 129.91 through 129.95:

A. An energy resource recovery facility which includes two (2) L&C Steinmuller municipal waste combustors, each rated at 600 tons of waste per day nominal at a higher heating value of 5200 Btu/pound. The air contaminant emissions from each combustor are controlled by individual Research-Cottrell spray dryer absorber using Sorbalit1) reagent to control mercury and acid gases, Research-Cottrell fabric collectors, and selective non catalytic reduction. (SNCR) system.

B. A diesel fired emergency generator.

Reasonably Available Control Technology (RACT) for the two (2) municipal waste combustors is compliance with the monitoring and record keeping requirements specified in Conditions 8 and 16 of this Operating Permit. RACT for the diesel generator is compliance with Condition 17 of this Operating Permit.

4. Requirements to comply with 40 CFR Part 60, Subpart Cb:

A. General Conditions

1. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart Cb (relating to Emission Guidelines and Compliance Times for large Municipal Waste Combustors that are constructed on or before September 20, 1994). The applicable requirements include definitions, emission standards, operational practices, operator training and certification, fugitive ash emissions, compliance and performance testing, monitoring, recordkeeping and reporting requirements, and compliance schedule.

2. The terms and conditions in this permit relating to 40 CFR Part 60, Subpart Cb are non-expiring and shall continue in full force and effect until modified by the Department. Any plan approval or Federally Enforceable State Operating Permit modification related to Subpart Cb requirements, including compliance dates shall be submitted to EPA for review and approval as a Section 111(d)/129 State Plan Revision,

B. Emission Standards (40 CFR § 60.33b)

The permittee shall comply with emission limitations set forth in 40 CFR § 60.33b.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED):

C. Operating Practices (40 CFR § 60.34b)

1. The permittee shall comply with the emission limits for carbon monoxide set forth in 40 CFR § 60.34b.
2. The permittee shall comply with operating practices requirements set forth in 40 CFR § 60.53b(b) and (c) of subpart Eb.

D. Operator Training and Certification. (40 CFR § 60.35b)

The permittee shall comply with the operator training and certification requirements specified in 40 CFR § 60.54b of subpart Eb and with the schedule specified in § 60.39b(c)(4).

E. Fugitive ash emissions (40 CFR § 60.36b)

The permittee shall comply with fugitive ash emissions as specified in 40 CFR § 60.55b of subpart Eb

F. Compliance and performance testing requirements (40 CFR § 60.38b)

The permittee shall comply with all the applicable performance testing and monitoring requirements set forth 40 CFR § 60.58b of subpart Eb. Permittee may elect to comply with the alternative performance testing schedule for dioxins/furans specified in § 60.58b(g)(5)(iii).

G. Reporting and Recordkeeping Requirements and compliance schedule (40 CFR § 60.39b)

1. The permittee shall comply with the applicable reporting and recordkeeping requirements set forth in 40 CFR § 60.59b of subpart Eb.
2. The permittee shall submit reports and notifications pursuant to 40 CFR Part 60, Subpart Cb to:
 - a. Regional Manager
Air Quality
PA Department of Environmental Protection
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED):

b. Director
Air Protection Division
U. S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103

H. Increments of Progress and Compliance Schedule

1. Submit a Final Control Plan. The permittee shall submit a Final Control Plan to the Department no later than November 1, 1998. If the construction or installation of air pollution control devices) is necessary to achieve compliance with the emission limits in 40 CFR Part 60, Subpart Cb, the permittee shall obtain a plan approval under 25 Pa. Code Chapter 127, Subchapter B, prior to the construction or installation of the control device(s).
2. Award Contracts. On or before May 18, 1999, the permittee shall award contracts to initiate the on-site construction or installation of air pollution control devices and/or process changes.
3. Initiate On-site Construction. The permittee shall initiate on-site construction, installation of air pollution control devices) or process changes by November 14, 1999.
4. Complete On-site Construction. The permittee shall complete the on-site construction, installation of air pollution control devices) or process changes by November 19, 2000. The devices or process changes shall be ready for operation on each MWC unit.
5. Final Compliance. The permittee shall comply with the original 1995 Subpart Cb requirements, as expeditiously as practicable, but no later than December 19, 2000. The air pollution control devices or process changes shall meet the 1995 emission limits for pollutants including, cadmium, lead, particulate matter, sulfur dioxide, hydrogen chloride, carbon monoxide and nitrogen oxides. See 62 FR 65387. Compliance with the amended 1997 IvIWC emission limits for sulfur dioxide, hydrogen chloride, lead and nitrogen oxides shall be achieved as expeditiously as practicable, but no later than December 19, 2000. See 62 FR 45880.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED):

6. Final Compliance Deadline for Mercury and Dioxin/Furans. The permittee shall comply with the emission limits for mercury and dioxin/furans as expeditiously as practicable, but no later than August 22, 2000.

5. Stack Emission Limitations

Nitrogen Oxides (NOx) emissions per combustor, expressed as NO₂, shall not exceed a 24-hour daily arithmetic average of 205 parts per million by volume, corrected to 7 percent oxygen, dry basis (40 C.F.R. Part 60 Section 60.33b(d), 109 pounds per hour, and 477.4 tons per year.

8. Continuous Monitoring Requirements

A. CEM for Criteria Pollutants

Department certified Continuous Emission Monitors ("CEM") shall be operated and maintained in accordance with the Department's "Continuous Source Monitoring Manual" (Revision No. 6 - January 1996) and latest amendments ("CSM Manual") for the following:

3. Nitrogen oxide monitored downstream of air pollution control equipment.

C. Other Continuous Monitor Requirements

Continuous monitoring shall be conducted at the locations approved by the Department for the following:

2. Oxygen monitored upstream and downstream of the air pollution control equipment.
- D. Certified continuous monitoring shall be conducted in accordance with 25 Pa. Code Chapter 139 and as approved by the Department.
 - E. The continuous monitors shall be operated in such a manner as to determine compliance with the applicable limits of Condition S of this Operating Permit and to operate the combustors as required under operation requirements of Condition 6 of this Operating Permit.
 - F. For the purpose of compliance with this Operating Permit, the oxygen content, as monitored upstream of the air pollution control equipment, unless otherwise specified by the Department, shall be used wherever the oxygen content is required to be adjusted to 7 %O₂.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED):

- H. The continuous emission monitoring system shall be maintained and operated to achieve the following data availability requirements:

Monitored Pollutant or Parameter

Requirement		Oxygen	NOx
Data Availability:	100% valid hours/day	>=95% valid hours/day	>=90% valid hours/month
Valid Hour:	>=90% valid readings (54 min.)	>=75% valid readings (45 min.)	>=75% valid readings (45 min.)

9. Testing Requirements

- A. Source testing shall be conducted for NOx to the Department approved method.

16. Record Keeping and Reporting Requirements

- A. The permittee shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of this Operating Permit. This file shall include, but not be limited to: all air pollution control system performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to this Operating Permit. All measurements, records and other data required to be maintained by the permittee shall be retained for at least two years following the date on which such measurements, records or data are recorded.
- B. The total amount of supplemental fuel consumed shall be metered and recorded at all times.
- C. The permittee shall submit to the Regional Air Quality Manager three (3) copies of all the completed test reports, including all operating conditions, for all tests listed in Conditions 9A and B of this Operating Permit on or before ninety (90) days after completion of the tests) and analyses, but no later than the time frame as established in the Department's Compliance Assurance Policy on Municipal Waste Incineration and latest amendments.
- D. All CEM reports shall be submitted to the Department within thirty (30) days after each quarter but no later than the time frame established in the Department's latest Continuous Source Monitoring Manual and the Compliance Assurance Policy for Municipal Waste Incinerators and later amendments. The Department reserves the right to require the report submissions on floppy disks with a format acceptable to the Department.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED) :

- E. The permittee shall keep *average hourly*, daily, monthly and yearly records of quantities of all solid waste incinerated at this facility in a format approved by the Department.
 - F. The permittee shall provide the Department with access to all continuous emission monitor read-outs via telephone dial-up (modem) from the Department's computer. It will be the permittee's responsibility to provide and maintain all hardware, software and funds required to provide this access. The Department shall specify the acquisition configuration.
17. Requirements for the emergency generator
- A. RAGT for the emergency generator is to comply with the requirements specified in 25 Pa. Code Sections 129.93 (e) and 129.95.
 - B. The generator shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.
 - C. The generator shall not be *operated in excess* of 500 hours in a consecutive 12-month period.
 - D. Records shall be kept for the operating hours of the generator.
18. General
- A. The expiration date shown on the Operating Permit is for state purposes. For Federal enforcement purposes the RACT provisions of the Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA).

APPENDIX A

Municipal Like Residual Waste

The following list of wastes is approved for burning at Montenay, exceptions noted:

Wood Waste (excludine neared wood)

Finished wood waste (painted or stained) Off spec wood products Wood packing/shipping materials
Wood pallets Sawdust

Paper Waste

Scrap paper
Cardboard scraps
Off spot labels/packaging materials
Packaging/shipping materials
Fresh air intake filters
Paper baskets
Paper filters
Respirator cartridges
Empty raw material bags
Empty containers (uncontaminated)

Plastic/Rubber/Synthetic Waste (excluding halogenated materials)

Carpet scraps
Cured rubber scraps
Rubber gasket material
Waste plastic (excluding extrusion waste and uncured resins)
CPE (polyethylene) materials
Rigid plastic foam
Expanded polystyrene or polyurethane foam
Nylon materials
Off spec labels/packaging materials
Off-spec plastics
Packaging/shipping materials
Plastic sheeting
Plastic cuttings or trimmings
Plastic utensils and cups
Polyurethane waste
Empty containers (uncontaminated)
Empty raw material bags

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0010A
MONTENAY MONTGOMERY LIMITED PARTNERSHIP
(Revised 6/20/00)

CONDITIONS (CONTINUED):

APPENDIX A

Municipal Like Residual Waste

Fresh air intake filters
Respirator cartridges
Fiberglass pasties

Food Waste (excluding treatment sledges)

Food waste
Spill material from food processing operations
Dried Off spec food produce

Miscellaneous Waste

Off Spec Health Care Products (subject to specific Form S approval)
Off Spec Pharmaceutical Waste (subject to specific Form S approval)
Fabric/cloth/teztile waste
Personal protective equipment (non-hazardous non-medical)
Fabric/cork gaskets
Pump packing material (rope)
Shingle scrap (non-asbestos)

