

A03 003

MONTENAY ENERGY RESOURCES OF MONTGOMERY COUNTY, INC.



September 28, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Re: National Environmental Achievement Track Application Form

Enclosed please find a completed application form for the National Environmental Achievement Track program. This application is being submitted by the Montgomery County Resource Recovery Facility.

If you have any questions, please do not hesitate to call me at (610) 940-6000 ext. 107.

Very truly yours,

A handwritten signature in blue ink that reads "Jay Lehr".

Jay Lehr
Facility Manager



A03-6013

*National
Environmental
Achievement Track
Application Form*

Montenay Energy Resources of Montgomery County, Inc. (MERMCI)

Name of Facility

Montenay Power Corp

Name of Parent Company

1155 Conshohocken Road

Street Address

Conshohocken, Pennsylvania 19428

City / State / Zip code

Contact person for the
National Environmental Achievement Track Program:

Name: Jay Lehr

Title: Facility Manager

Phone: (610) 940 – 6000 ext. 107

Fax: (610) 940 – 6012

E-mail: jaylehr@montenayenergy.com

Section A

Tell us about your facility

1. What do you do or make at your facility?

MERMCI is a Waste-to-energy / mass burn facility processing 1,216 tons of municipal solid waste per day. The facility is situated on 20.94 acres located in the town of Conshohocken, Pennsylvania. Municipal solid waste is converted to thermal energy; used to produce electricity that is sold to a local energy company.

Municipal solid waste is reduced in volume by 90 percent and 75 percent by weight. The facility incorporates the latest in state-of-the-art pollution control equipment and follows the guidelines of stringent state emissions requirements.

2. Standard Industrial Classification (SIC) Code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC 4953 (Waste Processing)

NAICS N/A

3. Does your company meet the Small Business Administration definition of a small business for your sector?

No

4. How many employees (full-time equivalents) currently work at your facility?

Fewer than 50

Section A, cont'd

Tell us about your facility

5. Does your facility have an EPA ID number(s)?

Yes PAD987357092
 PAD987376159
 PAD987362985

6. Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

Checklist attached at the end of the written application as attachment #1.

7. Check the appropriate box in the right-hand column.

Checklist enclosed with application.

8. Optional: Is there anything else you would like to tell us about your facility?

Our facility was the first waste to energy facility in North America to become ISO 14001 registered. We have also obtained the OSHA VPP STAR rating in safety and the American Society of Mechanical Engineers (ASME) named MERMCI as the Waste to Energy Facility of the Year in May 2000. See attached photograph of facility with proceeding data pages for further information.

Section B

Tell us about your EMS

1. Does your EMS meet the requirements for each element below as defined in the instructions?

- | | |
|-----------------------------------|-----|
| a. Environmental policy | Yes |
| b. Planning | Yes |
| c. Implementation and operation | Yes |
| d. Checking and corrective action | Yes |
| e. Management review | Yes |

2. Have you completed at least one EMS cycle (Plan-do-check-act)?

Yes

3. Did this cycle include both an EMS and a compliance audit?

Yes

4. Have you completed an objective self-assessment or third-party assessment of your EMS?

Yes – An assessment was performed and completed by the A.T.T. Company (ISO program consulting firm) prior to the July 1998 certification by AWM; a certified auditor for ISO 14001.

Yes – Third-party assessment was ISO 14001 Certification completed on July 10, 1998 by AWM. A 2-year audit of the complete EMS was successfully completed on September 12, 2000.

Section C

Tell us about your past achievements and future commitments

- 1. Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.**

First aspect you've selected

Air Emissions / Emissions of NO_x

What aspect have you selected?

Emissions of NO_x

What was the previous level (2 years ago)? Quantity / Units

280-300 ppm

What is the current level? Quantity / Units

<205 ppm

How is the current level an improvement over the previous level?

Approximately 33% reduction from the prior level

How did you achieve this improvement?

Installation of a DeNO_x system

Section C, cont'd

Tell us about your past achievements
and future commitments

Second aspect you've selected

1. Accidental Releases / Vulnerability and Potential Release
2. Materials Use / Recycled-Re-used

What aspect have you selected?

Waste Oil Disposal

What was the previous level (2 years ago)? Quantity / Units

All waste oil generated at the facility was shipped off-site for disposal.

What is the current level? Quantity / Units

All waste oil generated at the facility is re-used as a fuel supplement to MSW; utilized in combustion to thermal energy to generate electricity.

How is the current level an improvement over the previous level?

100% reclamation of waste oil. No associated risk of potential for release by transporting the materials off-site.

How did you achieve this improvement?

Acquired permitting to process waste oil (on-site) in the boilers.

2. **Select at least four environmental aspects (no more than 2 from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.**

First aspect you've selected

Air Emissions / Emissions of VOC's

a. What is the aspect?

Emissions of VOC's / Installation of storage tank VOC recovery system

b. Is this aspect identified as significant in your EMS?

Yes

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

393 lbs. VOC's (estimated) per year

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

The facility #2 fuel oil storage tank emits VOC's through an open vent to atmosphere. We can reduce the VOC's by 50%.

e. How will you achieve this improvement?

Design and install a VOC recovery system for the storage tank.

Second aspect you've selected

Materials Use / Recycled Materials

a. What is the aspect?

Community recycling of cardboard at the facility recycle center

b. Is this aspect identified as significant in your EMS?

Yes

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

The facility (as a regulatory requirement) currently offers recycling of three materials:

1. Bi-metal cans
2. Brown glass
3. Plastics #'s 1 & 2

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Offer public recycling of cardboard. This recyclable item would be in addition to what is required, currently. Expectations would indicate cardboard recycling at the amount of one ton, per year.

e. How will you achieve this improvement?

Notify the community (through routine newspaper notices) of the availability of cardboard recycling. The facility regularly serves notice of the days and hours of recycle center operation for the three recyclable materials presently collected. We will install a dedicated container to collect cardboard.

Third aspect you've selected

Water Use / Total Water Use

a. What is the aspect?

Re-use of high purity water

b. Is this aspect identified as significant in your EMS?

Yes

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

On the basis of boiler water change-out during a calendar year, approximately 200,000 gallons would normally be consumed in the wastewater process. On average, draining the boilers occurs 10 times (per year) with an average of 20,000 gallons, per event.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

To reduce the amount of wastewater currently generated at the facility. This would amount to 200,000 gallons.

e. How will you achieve this improvement?

In anticipation of the same volumes, high purity water will be stored and reused in the cooling tower make-up process. In so doing, reduced amounts of chemicals (for water treatment) will be realized. Make-up water, normally introduced to the tower water basin, requires demineralization and chemical additives.

Fourth aspect you've selected

Materials Use / Recycled/Re-Used Materials

a. What is the aspect?

Furnace grate bars / Maintenance materials

b. Is this aspect identified as significant in your EMS?

Yes

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Each grate bar removed from the furnace has a weight of approximately 70 lbs. The facility, on average, changes 1,000 grate bars per calendar year for a total weight of 70,000 lbs. Past practice has been to store as bulk waste.

- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.**

Grate bars will be recycled.

- e. How will you achieve this improvement?**

All grate bars will be sent to a recycling process company for beneficial use.

Section D

Tell us about your public outreach and reporting

- 1. How do you identify and respond to community concerns?**

Montenay Energy Resources created and maintains an internet web page with a variety of information that includes our Corporate Environmental Policy, our commitment to environmental compliance and reduction in air emissions.

Community groups, educational organizations and the general public are encouraged to tour the facility. A better understanding of the waste-to-energy process has been experienced by numerous tour groups visiting the facility each year.

- 2. How do you inform community members of important matters that affect them?**

The facility permits, when renewable, are published in the local newspapers to obtain public comment. These comments are addressed by PaDEP and Montenay. The facility maintained recycle center information, for local residents, is regularly published in the newspaper.

- 3. How will you make the Achievement Track Annual Performance Report available to the public?**

The facility will make the Achievement Track Annual Performance Report available to the public by use of the internet web page.

4. Are there any ongoing citizen suits against your facility?

No

5. List References:

Tim Hartman, Executive Director
Waste System Authority of Montgomery County
(610) 278 – 3045 ext. 17
Representative of a Community / Citizen Group

Francine Carlini, Program Manager
Air Quality Program
PA Dept. of Environmental Protection
(610) 832 - 6242
State / Local Regulator

James Topsale
US EPA Region III
Air Protection Division
(215) 814 - 2190
Other community / local reference

Peter Brown, VPP Program Manager
OSHA Region III Philadelphia
(215) 861 – 4914
Other community / local reference

Rominder P. S. Suri, Ph.D., P.E.
Department of Civil and Environmental Engineering
Villanova University
(610) 519 - 7631
Other community / local reference



On behalf of MERMCI
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the *Environmental Requirements Checklist*). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the *Achievement Track EMS requirements*, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Jay Lehr 10/27/00

Printed Name/Title

Jay Lehr / Facility Manager

Facility Name

Montenay Energy Resources of Montgomery County, INC

Facility Street Address

1155 Conshohocken Road
Conshohocken, PA 19428

Facility ID Numbers

PADEP AIR OP-46-0010A
PADEP Solidwaste 400558
NPDES PA 0052906

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility, Question 6*. The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility. .

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: Montenay Energy Resources of Montgomery County, Inc.

Facility Location: 1155 Conshohocken Road.
Conshohocken, PA 19428

EPA Facility ID: PAD987357092
PAD987376159
Facility ID Number(s): PAD987362985
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

- | | | |
|-----|--|-------------------------------------|
| | National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input type="checkbox"/> |
| 2. | Permits and Registration of Air Pollution Sources | <input checked="" type="checkbox"/> |
| 3. | General Emission Standards, Prohibitions and Restrictions | <input checked="" type="checkbox"/> |
| 4. | Control of Incinerators | <input checked="" type="checkbox"/> |
| 5. | Process Industry Emission Standards | <input type="checkbox"/> |
| 6. | Control of Fuel Burning Equipment | <input checked="" type="checkbox"/> |
| 7. | Control of VOCs | <input checked="" type="checkbox"/> |
| 8. | Sampling, Testing and Reporting | <input checked="" type="checkbox"/> |
| 9. | Visible Emissions Standards | <input checked="" type="checkbox"/> |
| 10. | Control of Fugitive Dust | <input checked="" type="checkbox"/> |
| 11. | Toxic Air Pollutants Control | <input checked="" type="checkbox"/> |
| 12. | Vehicle Emissions Inspections and Testing | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- | | | |
|-----|--|-------------------------------------|
| 13. | <u>NewSource Performance Standards for Municipal Waste Combustors</u> (610CFR60Cb) | <input checked="" type="checkbox"/> |
| 14. | <u>Reasonably Available Control Technology for NOx, VOCs</u> (25 Pa. Code 129) | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (*identify*)

17. PA implements federal stormwater permitting through Clean Streams Law
18. _____

Drinking Water Regulations

- Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
2. National Primary Drinking Water Standards (40 CFR 141)
Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
5. Underground Injection Control Requirements
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (*identify*)

7. _____
8. _____

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
2. Import and Export of Chemicals (40 CFR 707)
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
4. Chemical Information Rules (40 CFR 712)
5. Health and Safety Data Reporting (40 CFR 716)
6. Pre-Manufacture Notifications (40 CFR 720)
7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (*identify*)

10. _____
11. _____

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (*Identify*)

6. _____
7. _____

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
2. Permit Requirements for Solid Waste Disposal Facilities
3. Installation of Systems of Refuse Disposal
4. Solid Waste Storage and Removal Requirements
5. Disposal Requirements for Special Wastes ASH

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (*Identify*)

6. Pa. Solid Waste Management Act Regulations, 25 PA Code Chap. 271 and 283
7. Pa. Municipal Waste Planning, Recycling and Waste Reduction Act, 53 P.S. 4000.1101 et seq.

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
2. Designation of Hazardous Substances (40 CFR 116)
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
4. NPDES Permit Requirements (40 CFR 122) STORMWATER
5. Toxic Pollutant Effluent Standards (40 CFR 129)
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
10. Water Quality Standards
11. Effluent Limitations for Direct Dischargers
12. Permit Monitoring/Reporting Requirements STORMWATER
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
14. Collection, Handling, Processing of Sewage Sludge
15. Oil Discharge Containment, Control and Cleanup
16. Standards Applicable to Indirect Discharges (Pretreatment)

Hazardous Waste Management Regulations

- 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
- 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting
 - Pre-transport requirements
 - Record keeping/reporting
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements
 - Manifest system and record-keeping
 - Hazardous waste discharges
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards
 - Preparedness and prevention
 - Contingency plan and emergency procedures
 - Manifest system, Record keeping and reporting
 - Groundwater protection
 - Financial requirements
 - Use and management of containers
 - Tanks
 - Waste piles
 - Land treatment
 - Incinerators
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- 7. Administered Permit Program (Part B) (40 CFR 270)

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (*identify*)

- 8. _____
- 9. _____

Hazardous Materials Management

- Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- 5. Community Right-to-Know Regulations (40 CFR 350-372)

Pesticide Regulations

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)
- 3. Certification of Pesticide Applications (40 CFR 171)
- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (*identify*)

- 9. _____
- 10. _____

Environmental Clean-Up, Restoration, Corrective Action

- 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)

- 2. RCRA Corrective Action (*identify*)

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (*identify*)

- 3. _____
- 4. _____