Wheelabrator
SAUGUS

Via UPS

Department of Environmental Protection
Northeast Regional Office
Attn: BWP OP Reporting Program
205B Lowell Street
Wilmington, MA 01887

RE: **2015 Title V Compliance Certification**
Application No MBR-95-OPP-011
Wheelabrator Saugus Inc.

To Whom It May Concern:

Attached please find the Operating Permit 2014 Annual Compliance Certification and Report for the Wheelabrator Saugus Facility. The Operating Permit was issued October 19, 2007, so this report reflects our review of the Facility's compliance status for the period of January 1, 2015 through December 31, 2015.

If you have any questions, please do not hesitate to call.

Regards,

Peter Kendrigan

Peter Kendrigan Date: 1/29/2016
Plant Manager
Wheelabrator Saugus Inc.

cc: Saugus BOH – via UPS
T. Porter, WTI – via e-mail
R. Faia, WSI – via e-mail
AIR3220 SAU 2015 T-V Annual Compliance Certification

Director of Air Compliance Programs
USEPA Region 1
5 Post Office Square - Suite 100
Mail Code OES 04-2
Boston, MA 02109-3912

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Business Compliance Division

Operating Permit Annual Compliance Certification and Report

1197654	39704	108024
SSEIS Number	FMF Facility Number	Transmittal Number 4953
MBR-95-OPP-011	162632	SIC Code(s)
Application Number	FMF R.O. Number	

Pursuant to 310 CMR 7.00 Appendix C(5)(b)9, the Annual Compliance Certification must be certified by the responsible official. Failure to provide accurate information in this report may result in civil and/or criminal penalties according to 310 CMR 7.01(2).
Additional information regarding the report and documentation listed below must be kept on file for at least 5 years and be made available to the Department upon request as required by 310 CMR 7.00 Appendix C(10).

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

Facility Information

Wheelabrator Saugus, Inc.
Name

100 Salem Turnpike
Street Address

Saugus	MA	01906	(781) 233-7600
City	State	Zip Code	Telephone Number

Peter Kendrigan	Plant Manager
Facility Contact Person	Contact person's title

Annual Compliance Certification (General Condition No. 10 of the Operating Permit)

Reporting Period (Provide Inclusive Dates) 01/01/2015 (From) 12/31/2015 (To)

1. ☐ During the entire period, this facility was in compliance with ALL terms and conditions contained in the Operating Permit, each term and condition of which is identified and included in the included '*Air Operating Permit Annual Compliance Report*'. The method(s) use to determine compliance is/are the method(s) specified in the Operating Permit. OR

2. ☒ During the reporting period this facility was not in compliance with a term(s) and/or condition(s) contained in the Operating Permit. I am submitting the '*Air Operating Permit Annual Compliance Report*' and the *Air Operating Permit Cross-Reference Form*, Attachment E, for previous deviation submittals.

I certify that I have personally examined the Annual Compliance Report and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment. I am aware that additional information may be requested.

Peter Kendrigan	Plant Manager	
Name of Responsible Official	Title	
Peter Kendrigan	(781) 233-7600	1/29/2016
Signature of Responsible Official	Phone Number	Date

By Signing This Form You are Certifying to Page 2 Through Page 41

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

Air Operating Permit Annual Compliance Report

NOTE: Y=Yes; N=No; C=Continuous; I=Intermittent			Em. Limit/Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 3:																				
1	Unit Load:	< 110% of maximum demonstrated load (based on steam flow), calculated in 4-hour block arithmetic averages, measured during the most recent dioxin/furan compliance test in which compliance is achieved (3)	X			X																
1	PM Control Device Inlet Temperature:	< 17°C (30°F) above maximum demonstrated PM control device inlet temperature, calculated in 4-hour block arithmetic averages, measured during the most recent dioxin/furan compliance test in which compliance is achieved (3)	X			X																
1	S in No. 2 Fuel Oil	< 0.3% by weight	X			X																
1	Opacity	< 10% (6 minute block average)	X			X																
1	Cd	< 0.040 mg/dscm at 7% O2	X			X																
1	Dioxin/Furan	< 30 ng/dscm at 7% O2	X			X																
1	PM	< 27 mg/dscm at 7% O2 (1)	X			X																
1	Pb	< 0.440 mg/dscm at 7% O2	X			X																
1	SO2	< 29 ppm by volume at 7% O2 dry basis or 75% reduction by weight or volume, whichever is less stringent	X			X																
1	HCl	< 29 ppm by volume at 7% O2 dry basis or 95% reduction by weight or volume, whichever is less stringent	X			X																
1	CO	< 100 ppm by volume at 7% O2 dry basis at combustor outlet	X			X																
1	Pb	< 0.440 mg/dscm at 7% O2	X			X																
1	NOx	< 205 ppm by volume at 7% O2 dry basis	X			X																
1	Hg	< 0.080 mg/dscm at 7% O2 (during any single quarterly compliance test)	X			X																
1	Hg	< 0.028 mg/dscm at 7% O2 (based on average of 4 quarterly compliance tests per rolling 12 months)	X			X																
1	NH3	< 10 ppm by volume at 7% O2 dry basis (9)	X			X																
1	Be	< 7.0 x 10-7 lb/MMBTU	X			X																
1	HF	< 8.4 x 10-3 lb/MMBTU	Not applicable during reporting period – compliance established during initial performance tests																			
1	H2SO4	< 4.06 x 10-2 lb/MMBTU																				
1	VOC	< 0.022 lb/MMBTU																				
1	Dioxin/ Furan	< 0.045 picograms per cubic meter (ambient concentration)	X		X																	
2	Unit Load:	< 110% of maximum demonstrated load (based on steam flow), calculated in 4-hour block arithmetic averages, measured during the most recent dioxin/furan compliance test in which compliance is achieved (3)	X			X																

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 3:																				
2	PM Control Device Inlet Temperature.	< 17°C (30°F) above maximum demonstrated PM control device inlet temperature, calculated in 4-hour block arithmetic averages, measured during the most recent dioxin/furan compliance test in which compliance is achieved (3)	X			X																
2	S in No. 2 Fuel Oil	< 0.3% by weight	X			X																
2	Opacity	< 10% (6 minute block average)	X			X																
2	Cd	< 0.040 mg/dscm at 7% O2	X			X																
2	Dioxin/Furan	< 30 ng/dscm at 7% O2	X			X																
2	PM	< 27 mg/dscm at 7% O2 (1)	X			X																
2	Pb	< 0.440 mg/dscm at 7% O2	X			X																
2	SO2	< 29 ppm by volume at 7% O2 dry basis or 75% reduction by weight or volume, whichever is less stringent	X			X																
2	HCl	< 29 ppm by volume at 7% O2 dry basis or 95% reduction by weight or volume, whichever is less stringent	X			X																
2	CO	< 100 ppm by volume at 7% O2 dry basis at combustor outlet	X			X																
2	Pb	< 0.440 mg/dscm at 7% O2	X			X																
2	NOx	< 205 ppm by volume at 7% O2 dry basis	X			X																
2	Hg	< 0.080 mg/dscm at 7% O2 (during any single quarterly compliance test)	X			X																
2	Hg	< 0.028 mg/dscm at 7% O2 (based on average of 4 quarterly compliance tests per rolling 12 months)	X			X																
2	NH3	< 10 ppm by volume at 7% O2 dry basis (9)	X			X																
2	Be	< 7.0 x 10-7 lb/MMBTU	X			X																
2	HF	< 8.4 x 10-3 lb/MMBTU	Not applicable during reporting period – compliance established during initial performance tests.																			
2	H2SO4	< 4.06 x 10-2 lb/MMBTU																				
2	VOC	< 0.022 lb/MMBTU																				
2	Dioxin/ Furan	< 0.045 picograms per cubic meter (ambient concentration)	X			X																
3	Fugitive Ash	Visible emissions < 9 minutes per 3 hour period (2)	X			X																

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
1		1. As required by 310 CMR 7.08(2)(g), the facility shall comply with the provisions of 40 CFR 60.58b, "Compliance and Performance Testing", as amended, the provisions of which are hereby incorporated by reference. Compliance with the applicable requirements as set forth in 310 CMR 7.08(2)(f) and Section 4 of this Operating Permit, shall be determined in accordance with 40 CFR 60.58b, except as provided under 310 CMR 7.08(2)(g)1., 2., 3., 4., 5., and 6., and as specified within this Operating Permit.									X			X								
1		2. The facility shall conduct compliance tests for dioxin/furan emissions according to one of the schedules specified below, as required by 310 CMR 7.08(2)(g)1 a and b.																				
1		a. The facility shall conduct compliance testing for dioxin/furan emissions on all municipal waste combustor unit(s) on a nine month basis, or									X			X								
1		b. For municipal waste combustor unit(s) where all compliance tests for all unit(s) over a 27 month period indicate that dioxin/furan emissions are less than or equal to 7 nanograms per dry standard cubic meter total mass (ng/dscm), corrected to 7 percent oxygen, the facility may elect to conduct compliance tests for one unit every nine months.									X			X								
1		At a minimum, a compliance test for dioxin/furan emissions shall be conducted every nine months following the previous compliance test for one unit at the municipal waste combustor plant. Every nine months a different unit at the municipal waste combustor plant shall be tested, and the units at the plant shall be tested in sequence.									X			X								
1		The facility may continue to conduct compliance testing on only one unit per nine month basis so long as the dioxin/furan emissions remain less than or equal to 7 ng/dscm @ 7% O2.									X			X								
1		If any nine month compliance test indicates dioxin/furan emissions greater than the specified limit, compliance tests shall thereafter be conducted on all units at the plant every nine months until and unless all nine month compliance tests for all units at the plant over a 27 month period indicate dioxin/furan emissions less than or equal to the 7 ng/dscm @ 7% O2									X			X								
1		3. In accordance with 310 CMR 7.08(2)(g)1.d., for municipal waste combustor units where carbon injection (or equivalent) is used to comply with the dioxin/furan emission limits specified in 310 CMR 7.08(2)(f)2. or the dioxin/furan emission limit specified in 310 CMR 7.08(2)(g)1.b, the facility shall measure and calculate the carbon (or equivalent) usage rate following the procedures specified in 40 CFR 60.58b(m), as amended.					X			X												
1		4. In accordance with 310 CMR 7.08(2)(g)2., compliance testing for Hg shall be conducted on all municipal waste combustor unit(s) on a quarterly basis Compliance with the emissions limit specified in 310 CMR 7.08(2)(f) 2. shall be based on the average of four quarterly compliance tests per rolling twelve months but shall not exceed 0.080 mg/dscm in any quarterly test.									X			X								

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
1		If compliance with the Hg emission limit has been achieved in each quarter for eight consecutive quarters, the facility may elect to perform compliance testing on a nine month basis. Any municipal waste combustor unit(s) that cannot achieve compliance with the emission limitation in 310 CMR 7.08(2)(f)2. during the nine month compliance test shall resume quarterly compliance testing as specified above									X			X								
1		5. In accordance with 310 CMR 7.08(2)(g)3., for municipal waste combustor unit(s) which employ a carbon injection (or equivalent) Hg emission control system, the facility shall conduct optimization tests. These tests will determine the optimum feed rate for the Hg emissions control apparatus by determining the carbon (or equivalent) feed rate at which the emissions of Hg are equal to or less than the applicable limit at 310 CMR 7.08(2)(f)2 The optimization test shall be conducted as follows:									Not applicable during reporting period - optimization testing complete and feed rate established at 8 lb/hr											
1		a. The optimization tests shall be performed after a change in carbon (or equivalent), upon request by MassDEP, upon request by the facility, or annually if required under 310 CMR 7.08(2)(g)4.																				
1		b. If there are identical municipal waste combustor units at the municipal waste combustor plant, then optimization tests may be performed on one unit, and the resulting parameters applied to the other unit(s), which is identical to that unit at that plant.																				
1		c. Within 30 calendar days of the conclusion of any optimization test, the facility shall submit to MassDEP for approval a proposed optimized carbon (or equivalent) feed rate that minimizes Hg emissions An approvable feed rate is the feed rate such that a higher feed rate achieves insignificant additional reductions in Hg emissions compared to the amount of carbon (or equivalent) added. The carbon (or equivalent) feed rate approved by MassDEP shall be used to operate the carbon injection (or equivalent) Hg control system until the next optimization test is performed and the feed rate approved																				
1		6. In accordance with 310 CMR 7.08(2)(g)5., the facility shall conduct compliance testing every nine months for each municipal waste combustor unit. Compliance testing for dioxin/furan and Hg shall be conducted as specified in 310 CMR 7.08(2)(g)1. and 2.									X			X								
1		7. In accordance with Approval MBR-88-INC-004, facility emissions testing and associated dispersion modeling is required to be performed every nine months. Said emissions testing and modeling shall be conducted in accordance with MassDEP approved protocols In conjunction with the above emissions testing, testing of the facility's ash is also required. (State Only Requirement)									X			X								

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
1		8. In accordance with Approval MBR-98-ECP-006, the facility shall conduct compliance testing for NH3 every nine months for each municipal waste combustor unit. Said testing shall be conducted in accordance with a test protocol, which has been submitted to MassDEP at least 60 days prior to the anticipated date of testing, and approved by MassDEP prior to testing. Compliance with the NH3 emission limit/standard shall be based upon a minimum of 3 compliance test runs on each MWC unit per compliance test, measured at the Spray Dryer Absorber Inlet or Fabric Filter outlet, using EPA Test Method 26A or other test method approved by MassDEP. (State Only Requirement)									X			X								
1		9. In accordance with 310 CMR 7.08(2)(g)5.a. (further clarified in a letter dated October 1, 1998 from MassDEP's Business Compliance Division), Continuous Emissions Monitoring Systems (CEMS) which monitor NOx, SO2, and operating practices parameters (e.g., CO, unit load and PM control device inlet temperature) shall obtain at a minimum valid continuous emissions monitoring system data for 75% of the operating hours per day (18 hours per day) for 75% of the days per month (23 days/month for a 30 day month) that a municipal waste combustor unit is combusting solid waste continuously (24 hours/day) and valid CEMS data must be obtained for 90% of the hours per quarter that the municipal waste combustor unit is combusting municipal solid waste					X			X												
1		10. In accordance with 310 CMR 7.08(2)(g)5.b., CO CEMS installed and operated in accordance with Performance Specification 4 of 40 CFR Part 60, Appendix B, will satisfy the requirements in 310 CMR 7.08(2)(g).					X			X	CO monitor operated in accordance with PS 4a.											
1		11. The nine month compliance demonstration for the opacity limit required under 310 CMR 7.08(2)(g)(6) may be conducted using either data from the continuous opacity monitoring system (COMS) or the procedures in 40 CFR Part 60, Appendix A, Method 9 as provided for under 40 CFR 60.58b(c)(6) and 40 CFR 60.11(e)(6).					X			X	X			X								
1		12. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2. and consistent with the requirements of Approval MBR-88-INC-004, monitor sulfur content of each new shipment of fuel oil received. Compliance with the sulfur content of the fuel oil can be demonstrated through fuel oil analysis. The analysis of sulfur content of the fuel oil shall be in accordance with the applicable ASTM test methods or any other method approved by MassDEP and EPA. Fuel oil sulfur information may be provided by fuel oil suppliers	Supplier(s) provided fuel sold as ULSD only and provided representative analyses of periodic deliveries during this reporting period. Shipments received were labeled as 15 ppm sulfur ULSD.				X			X												
1		13. As required by 310 CMR 7.08(2)(g) and Approval MBR-98-ECP-006, the facility shall comply with the provisions of 40 CFR 60.58b, "Compliance and Performance Testing", as amended, the provisions of which are hereby incorporated by reference. Compliance with the fugitive ash requirements as set forth in 310 CMR 7.08(2)(f)5 and Section 4 of this Operating Permit, shall be determined in accordance with 40 CFR 60.58b. Fugitive ash emissions shall be tested every nine months in accordance with 310 CMR 7.08(2)(g) requirements.									X			X								

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
1		14 In accordance with Approval MBR-92-INC-003, landfill leachate shall be sampled and analyzed for metals on a quarterly basis. The metals analysis shall be consistent with the facility's Chapter 584 emissions testing program. The duration of the leachate sampling program shall be determined by MassDEP upon review of the leachate data and compliance emissions test data. (State Only Requirement)									X			X								
1		15 In accordance with 310 CMR 7.13(1) and Approval MBR-88-INC-004, any person owning, leasing, operating or controlling a facility for which MassDEP has determined that stack testing is necessary to ascertain compliance with MassDEP's regulations or design approval provisos shall cause such stack testing:																				
1		(a) to be conducted by a person knowledgeable in stack testing,									X			X								
1		(b) to be conducted in accordance with procedures contained in a test protocol which has been approved by MassDEP, and									X			X								
1		(c) to be conducted in the presence of a representative of MassDEP when such is deemed necessary.									X			X								
1		16. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., conduct any other testing or testing methodology if and when requested by MassDEP or EPA.	DEP requested (in 2011) ongoing testing for condensible particulate on alternating combustors.								X			X								
1		17. Monitor operations such that information may be compiled for the annual preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.					X			X	X			X								
2		1. As required by 310 CMR 7.08(2)(g), the facility shall comply with the provisions of 40 CFR 60.58b, "Compliance and Performance Testing", as amended, the provisions of which are hereby incorporated by reference. Compliance with the applicable requirements as set forth in 310 CMR 7.08(2)(f) and Section 4 of this Operating Permit, shall be determined in accordance with 40 CFR 60.58b, except as provided under 310 CMR 7.08(2)(g)1., 2., 3., 4., 5., and 6., and as specified within this Operating Permit.									X			X								
2		2. The facility shall conduct compliance tests for dioxin/furan emissions according to one of the schedules specified below, as required by 310 CMR 7.08(2)(g)1.a and b.																				
2		a. The facility shall conduct compliance testing for dioxin/furan emissions on all municipal waste combustor unit(s) on a nine month basis, or									X			X								
2		b. For municipal waste combustor unit(s) where all compliance tests for all unit(s) over a 27 month period indicate that dioxin/furan emissions are less than or equal to 7 nanograms per dry standard cubic meter total mass (ng/dscm), corrected to 7 percent oxygen, the facility may elect to conduct compliance tests for one unit every nine months.									X			X								
2		At a minimum, a compliance test for dioxin/furan emissions shall be conducted every nine months following the previous compliance test for one unit at the municipal waste combustor plant. Every nine months a different unit at the municipal waste combustor plant shall be tested, and the units at the plant shall be tested in sequence.									X			X								

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
2		The facility may continue to conduct compliance testing on only one unit per nine month basis so long as the dioxin/furan emissions remain less than or equal to 7 ng/dscm @ 7% O2.									X											
2		If any nine month compliance test indicates dioxin/furan emissions greater than the specified limit, compliance tests shall thereafter be conducted on all units at the plant every nine months until and unless all nine month compliance tests for all units at the plant over a 27 month period indicate dioxin/furan emissions less than or equal to the 7 ng/dscm @ 7% O2									X											
2		3. In accordance with 310 CMR 7.08(2)(g)1.d., for municipal waste combustor units where carbon injection (or equivalent) is used to comply with the dioxin/furan emission limits specified in 310 CMR 7.08(2)(f)2. or the dioxin/furan emission limit specified in 310 CMR 7.08(2)(g)1.b, the facility shall measure and calculate the carbon (or equivalent) usage rate following the procedures specified in 40 CFR 60.58b(m), as amended.					X			X												
2		4. In accordance with 310 CMR 7.08(2)(g)2., compliance testing for Hg shall be conducted on all municipal waste combustor unit(s) on a quarterly basis. Compliance with the emissions limit specified in 310 CMR 7.08(2)(f) 2. shall be based on the average of four quarterly compliance tests per rolling twelve months but shall not exceed 0.080 mg/dscm in any quarterly test									X											
2		If compliance with the Hg emission limit has been achieved in each quarter for eight consecutive quarters, the facility may elect to perform compliance testing on a nine month basis Any municipal waste combustor unit(s) that cannot achieve compliance with the emission limitation in 310 CMR 7.08(2)(f)2. during the nine month compliance test shall resume quarterly compliance testing as specified above									X			X								
2		5. In accordance with 310 CMR 7.08(2)(g)3., for municipal waste combustor unit(s) which employ a carbon injection (or equivalent) Hg emission control system, the facility shall conduct optimization tests These tests will determine the optimum feed rate for the Hg emissions control apparatus by determining the carbon (or equivalent) feed rate at which the emissions of Hg are equal to or less than the applicable limit at 310 CMR 7.08(2)(f)2. The optimization test shall be conducted as follows:									Not applicable during reporting period - optimization testing complete and feed rate established at 8 lb/hr											
2		a The optimization tests shall be performed after a change in carbon (or equivalent), upon request by MassDEP, upon request by the facility, or annually if required under 310 CMR 7.08(2)(g)4																				
2		b. If there are identical municipal waste combustor units at the municipal waste combustor plant, then optimization tests may be performed on one unit, and the resulting parameters applied to the other unit(s), which is identical to that unit at that plant.																				

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
2		c. Within 30 calendar days of the conclusion of any optimization test, the facility shall submit to MassDEP for approval a proposed optimized carbon (or equivalent) feed rate that minimizes Hg emissions. An approvable feed rate is the feed rate such that a higher feed rate achieves insignificant additional reductions in Hg emissions compared to the amount of carbon (or equivalent) added. The carbon (or equivalent) feed rate approved by MassDEP shall be used to operate the carbon injection (or equivalent) Hg control system until the next optimization test is performed and the feed rate approved.																				
2		6. In accordance with 310 CMR 7.08(2)(g)6., the facility shall conduct compliance testing every nine months for each municipal waste combustor unit. Compliance testing for dioxin/furan and Hg shall be conducted as specified in 310 CMR 7.08(2)(g)1 and 2.									X			X								
2		7. In accordance with Approval MBR-88-INC-004, facility emissions testing and associated dispersion modeling is required to be performed every nine months Said emissions testing and modeling shall be conducted in accordance with MassDEP approved protocols. In conjunction with the above emissions testing, testing of the facility's ash is also required (State Only Requirement)									X			X								
2		8. In accordance with Approval MBR-98-ECP-006, the facility shall conduct compliance testing for NH3 every nine months for each municipal waste combustor unit. Said testing shall be conducted in accordance with a test protocol, which has been submitted to MassDEP at least 60 days prior to the anticipated date of testing, and approved by MassDEP prior to testing. Compliance with the NH3 emission limit/standard shall be based upon a minimum of 3 compliance test runs on each MWC unit per compliance test, measured at the Spray Dryer Absorber inlet or Fabric Filter outlet, using EPA Test Method 26A or other test method approved by MassDEP (State Only Requirement)									X			X								
2		9. In accordance with 310 CMR 7.08(2)(g)5.a (further clarified in a letter dated October 1, 1998 from MassDEP's Business Compliance Division), Continuous Emissions Monitoring Systems (CEMS) which monitor NOx, SO2, and operating practices parameters (e.g., CO, unit load and PM control device inlet temperature) shall obtain at a minimum valid continuous emissions monitoring system data for 75% of the operating hours per day (18 hours per day) for 75% of the days per month [23 days/month for a 30 day month) that a municipal waste combustor unit is combusting solid waste continuously (24 hours/day) and valid CEMS data must be obtained for 90% of the hours per quarter that the municipal waste combustor unit is combusting municipal solid waste.					X			X												
2		10. In accordance with 310 CMR 7.08(2)(g)5.b., CO CEMS installed and operated in accordance with Performance Specification 4 of 40 CFR Part 60, Appendix B, will satisfy the requirements in 310 CMR 7.08(2)(g).					X			X	CO monitor operated in accordance with PS 4a.											
2		11. The nine month compliance demonstration for the opacity limit required under 310 CMR 7.08(2)(g)(6) may be conducted using either data from the continuous opacity monitoring system (COMS) or the procedures in 40 CFR Part 60, Appendix A, Method 9 as provided for under 40 CFR 60.58b(c)(6) and 40 CFR 60.11(e)(6).					X			X	X			X								

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 4:																				
2		12. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2 and consistent with the requirements of Approval MBR-88-INC-004, monitor sulfur content of each new shipment of fuel oil received. Compliance with the sulfur content of the fuel oil can be demonstrated through fuel oil analysis. The analysis of sulfur content of the fuel oil shall be in accordance with the applicable ASTM test methods or any other method approved by MassDEP and EPA. Fuel oil sulfur information may be provided by fuel oil suppliers.	Supplier(s) provided fuel sold as ULSD only and provided representative analyses of periodic deliveries during this reporting period Shipments received were labeled as 15 ppm sulfur ULSD.				X			X													
2		13 As required by 310 CMR 7 08(2)(g) and Approval MBR-98-ECP-006, the facility shall comply with the provisions of 40 CFR 60.58b, "Compliance and Performance Testing", as amended, the provisions of which are hereby incorporated by reference Compliance with the fugitive ash requirements as set forth in 310 CMR 7.08(2)(f)5 and Section 4 of this Operating Permit, shall be determined in accordance with 40 CFR 60 58b. Fugitive ash emissions shall be tested every nine months in accordance with 310 CMR 7.08(2)(g) requirements.									X			X								
2		14. In accordance with Approval MBR-92-INC-003, landfill leachate shall be sampled and analyzed for metals on a quarterly basis. The metals analysis shall be consistent with the facility's Chapter 584 emissions testing program. The duration of the leachate sampling program shall be determined by MassDEP upon review of the leachate data and compliance emissions test data. (State Only Requirement)									X			X								
2		15. In accordance with 310 CMR 7.13(1) and Approval MBR-88-INC-004, any person owning, leasing, operating or controlling a facility for which MassDEP has determined that stack testing is necessary to ascertain compliance with MassDEP's regulations or design approval provisos shall cause such stack testing:																				
2		(a) to be conducted by a person knowledgeable in stack testing,									X			X								
2		(b) to be conducted in accordance with procedures contained in a test protocol which has been approved by MassDEP, and									X			X								
2		(c) to be conducted in the presence of a representative of MassDEP when such is deemed necessary.									X			X								
2		16 Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., conduct any other testing or testing methodology if and when requested by MassDEP or EPA.	DEP requested (in 2011) ongoing testing for condensible particulate on alternating combustors.								X			X								
2		17. Monitor operations such that information may be compiled for the annual preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7 12					X			X	X			X								

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
1		1. In accordance with 310 CMR 7.08(2)(h)9., the results of all nine month compliance tests conducted to determine compliance with the PM, opacity, Cd, Pb, Hg, dioxin/furan, HCl, and fugitive ash emission limits shall be recorded along with supporting calculations and submitted to MassDEP within 90 days after the test. In addition, in accordance with Approval MBR-98-ECP-006, the results of the quarterly Hg compliance tests shall also be recorded and submitted to MassDEP within 30 days after the test.													X			X				
1		Furthermore, in accordance with Approval MBR-98-ECP-006, the results of all nine month compliance tests conducted to determine compliance with the NH3 emission limit shall be recorded along with supporting calculations and submitted to MassDEP within 90 days after the test. (State Only Requirement)													X			X				
1		2. During all dioxin/furan compliance tests, the maximum demonstrated municipal waste combustor load level and maximum PM control device inlet temperature averages (for each PM control device) shall be recorded along with supporting calculations, as required by 310 CMR 7.08(2)(h)10.													X			X				
1		3. As required by 310 CMR 7.08(2)(h)4., municipal waste combustor unit(s) that apply carbon (or equivalent) for Hg or dioxin/furan control, shall maintain the following records:																				
1		a. The average carbon (or equivalent) mass feed rate (in lbs/hr) estimated as required under 40 CFR 60.58b(m)(1)(i), as amended, during all Hg compliance tests, with supporting calculations.													X			X				
1		b. The average carbon (or equivalent) mass feed rate (in lbs/hr) estimated for each hour of operation as required under 40 CFR 60.58b(m)(1)(ii), as amended, during the initial dioxin/furan performance test and all subsequent nine month compliance tests, with supporting calculations.													X			X				
1		c. The average carbon (or equivalent) mass feed rate (in lbs/hr) estimated for each hour of operation as required under 40 CFR 60.58b(m)(3)(ii), as amended, with supporting calculations.													X			X				
1		d. The total carbon (or equivalent) usage for each calendar quarter estimated as specified under 40 CFR 60.58b(m)(3), as amended, with supporting calculations													X			X				
1		e. The carbon (or equivalent) injection system operating parameter data for the parameter(s) that are the primary indicator(s) of carbon (or equivalent) feed rate.													X			X				
1		4. As required by 310 CMR 7.08(2)(h)13., for municipal waste combustor units that apply carbon (or equivalent) for Hg or dioxin/furan control.																				
1		a. Identification of the calendar dates when the average carbon (or equivalent) mass feed rates recorded under 310 CMR 7.08(2)(h)4.c. were less than either of the hourly carbon feed rates estimated during compliance tests for Hg or dioxin/furan emissions and recorded under 310 CMR 7.08(2)(h) 4. a. or b., respectively, with reasons for such feed rates and a description of corrective actions taken													X			X				

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
1		b. Identification of the calendar dates when the carbon injection (or equivalent) system operating parameter(s) that are the primary indicator(s) of carbon mass feed rate (or equivalent) recorded under 310 CMR 7.08(2)(h) 4. e., are below the level(s) estimated during the compliance tests as specified in 40 CFR 60.58b(m)(1)(i) and 60.58b(m)(1)(ii), as amended, with reasons for such occurrences and a description of corrective actions taken.													X			X				
1		5. In accordance with 310 CMR 7.08(2)(h)2., the facility shall record the emission concentrations and parameters measured using continuous emissions monitoring systems. The measurements specified below shall be recorded and shall be available for submittal to MassDEP or for onsite review by an inspector													X			X				
1		a. All 6-minute block averages of opacity levels as specified under 40 CFR 60.58b(c), as amended, including the highest level measured.													X			X				
1		b. All 1-hour block averages of SO2 emission concentrations as specified under 40 CFR 60.58b(e), as amended.													X			X				
1		c. All 1-hour block averages of NOx emission concentrations as specified under 40 CFR 60.58b(h), as amended.													X			X				
1		d. All 1-hour block averages of CO emission concentrations, municipal waste combustor unit load measurements, and PM control device inlet temperatures as specified under 40 CFR 60.58b(i), as amended													X			X				
1		e. All 24-hour daily geometric average SO2 emission concentrations and all 24-hour daily geometric averages of percent reductions in SO2 emissions as applicable, as specified under 40 CFR 60.58b(e), as amended, including the highest level recorded													X			X				
1		f. All 24-hour daily arithmetic average NOx emission concentrations as specified under 40 CFR 60.58b(h), as amended, including the highest level recorded.													X			X				
1		g. All 4-hour block averages of CO emission concentrations, as applicable, as specified under 40 CFR 60.58b(i), as amended, including the highest level recorded.													X			X				
1		h. All 4-hour block arithmetic averages of municipal waste combustor unit load levels (steam flow) and PM control device inlet temperatures as specified under 40 CFR 60.58b(i), as amended, including the highest level recorded													X			X				
1		6. As required by 310 CMR 7.08(2)(h)3., the facility shall record the calendar dates when any of the average emissions concentrations or percent reductions, or operating parameters recorded under 310 CMR 7.08(2)(h)2., exceed the applicable limits, with detailed specific reasons for such exceedances and a description of corrective actions taken.													X			X				
1		7. As required by 310 CMR 7.08(2)(h)5., the facility shall record the calendar dates and time periods for which the minimum number of hours of any of the data specified below have not been obtained including reasons for not obtaining sufficient data and a description of corrective actions taken.																				
1		a. SO2 emissions data,													X			X				

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
1		b. NOx emissions data,													X			X				
1		c. CO emissions data,													X			X				
1		d. Municipal waste combustor unit load data,													X			X				
1		e. PM control device inlet temperature data.													X			X				
1		8. As required by 310 CMR 7.08(2)(h)6., the facility shall record each occurrence that SO2 emissions data, NOx emissions data, or operational data (e.g. CO emissions, unit load, and PM control device inlet temperature) have been excluded from the calculation of average emission concentrations or parameters, along with detailed and specific reasons for excluding the data.													X			X				
1		9. As required by 310 CMR 7.08(2)(h)7., the facility shall record the results of daily drift tests and quarterly accuracy determinations for SO2, NOx, and CO continuous emission monitoring systems, as required under 40 CFR, Part 60, Appendix F, Procedure 1.													X			X				
1		10. As required by 310 CMR 7.08(2)(h)8., the facility shall maintain records of each occurrence of a start-up, shut-down or malfunction that results in an exceedance of the limits defined in Table 3, including the specific reasons for each occurrence, date, time, and unit involved. Average emissions concentrations or percent reductions, or operating parameters recorded under 310 CMR 7.08(2)(h)2., shall be recorded during start-up, shut-down or malfunction that results in an exceedance of the limits defined in Table 3													X			X				
1		11. Consistent with Approval MBR-88-NC-004, the facility shall maintain records of the test results of every nine month test. In addition, the test results of every nine month test of the facility's ash shall be recorded. (State Only Requirement)													X			X				
1		12. In accordance with 310 CMR 7.08(2)(h)11., the facility shall maintain records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who are certified by ASME (Operator Certification and Provisional Certification), including the dates of initial and renewal certifications and documentation of current certification.													X			X				
1		The facility shall also maintain records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who have completed the EPA municipal waste combustor operator training course if required.													X			X				
1		13. In accordance with 310 CMR 7.08(2)(h)12., the facility shall maintain records showing the names of the persons who have completed a review of the operating manual as required by 310 CMR 7.08(2)(f)6.d., including the date of the initial review and subsequent annual reviews.													X			X				
1		14. In accordance with 310 CMR 7.08(2)(h)1., the facility shall maintain the calendar date of each record required above													X			X				

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
1		15. In accordance with Approval MBR-88-INC-004, the facility shall maintain records documenting all maintenance performed on the furnaces, emission controls, ash handling system, and all required continuous emissions and other monitoring devices. (State Only Requirement)													X		X		THIS IS NOT A NEW DEVIATION. Annual calibration of the steam flow transmitters were conducted in June 2012, however the calibration record could not be located			
1		16. In accordance with Approval MBR-88-INC-004, the facility shall maintain a copy of this Approval letter within the control room of the facility. Maintaining a copy of this Operating Permit within the control room of the facility shall be deemed compliance with this requirement. (State Only Requirement)													X			X				
1		17. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2 and consistent with the requirements of Approval MBR-88-INC-004, the facility shall maintain records of the sulfur content of each shipment of fuel oil received in order to demonstrate compliance with the fuel sulfur content limit stated in Table 3.	Shipments received were labeled as 15 ppm sulfur ULSD by the supplier.												X			X				
1		18. In accordance with 310 CMR 7.08(2)(h)9. and Approval MBR-98-ECP-006, maintain records of the results of all nine month compliance tests conducted to determine compliance with the fugitive ash emission limit, along with supporting calculations.													X			X				
1		19. Pursuant to MassDEP's authority through 310 CMR 7.00. Appendix C(9)(b)2 and consistent with the requirements of Approval MBR-92-INC-003, maintain records of the quarterly metals analysis performed on landfill leachate until such time that the leachate sampling program is discontinued by MassDEP pending review of the leachate data and compliance emissions test data. (State Only Requirement)													X			X				
1		20. In accordance with Approval MBR-92-INC-003, a copy of this Approval letter shall be maintained within the control room of the facility. Maintaining a copy of this Operating Permit within the control room of the facility shall be deemed compliance with this requirement (State Only Requirement)													X			X				
1		21. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., maintain the test results of any other testing or testing methodology required by MassDEP or EPA.	All test results for parameters requested by MADEP are submitted and kept on-site.												X			X				
1		22. Maintain records for the annual preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.													X			X				
1		23. Keep copies of Source Registration/Emission Statement Forms submitted annually to MassDEP as required per 310 CMR 7.12(3)(b)													X			X				
1		24. In accordance with 310 CMR 7.08(2)(h) and 310 CMR 7.00: Appendix C(10)(b), maintain records of all monitoring data and supporting information required by this Operating Permit on site for five (5) years from the date of the monitoring sample, measurement, report or initial Operating Permit Application. Said records shall be made available to MassDEP personnel upon request.													X		X		THIS IS NOT A NEW DEVIATION: Annual calibration of the steam flow transmitters were conducted in June 2012, however the calibration record could not be located			

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
2		1. In accordance with 310 CMR 7.08(2)(h)9., the results of all nine month compliance tests conducted to determine compliance with the PM, opacity, Cd, Pb, Hg, dioxin/furan, HCl, and fugitive ash emission limits shall be recorded along with supporting calculations and submitted to MassDEP within 90 days after the test. In addition, in accordance with Approval MBR-98-ECP-006, the results of the quarterly Hg compliance tests shall also be recorded and submitted to MassDEP within 30 days after the test.													X			X				
2		Furthermore, in accordance with Approval MBR-98-ECP-006, the results of all nine month compliance tests conducted to determine compliance with the NH3 emission limit shall be recorded along with supporting calculations and submitted to MassDEP within 90 days after the test (State Only Requirement)													X			X				
2		2. During all dioxin/furan compliance tests, the maximum demonstrated municipal waste combustor load level and maximum PM control device inlet temperature averages (for each PM control device) shall be recorded along with supporting calculations, as required by 310 CMR 7.08(2)(h)10													X			X				
2		3. As required by 310 CMR 7.08(2)(h)4., municipal waste combustor unit(s) that apply carbon (or equivalent) for Hg or dioxin/furan control, shall maintain the following records:																				
2		a. The average carbon (or equivalent) mass feed rate (in lbs/hr) estimated as required under 40 CFR 60.58b(m)(1)(i), as amended, during all Hg compliance tests, with supporting calculations.													X			X				
2		b. The average carbon (or equivalent) mass feed rate (in lbs/hr) estimated for each hour of operation as required under 40 CFR 60.58b(m)(1)(ii), as amended, during the initial dioxin/furan performance test and all subsequent nine month compliance tests, with supporting calculations.													X			X				
2		c. The average carbon (or equivalent) mass feed rate (in lbs/hr) estimated for each hour of operation as required under 40 CFR 60.58b(m)(3)(ii), as amended, with supporting calculations.													X			X				
2		d. The total carbon (or equivalent) usage for each calendar quarter estimated as specified under 40 CFR 60.58b(m)(3), as amended, with supporting calculations.													X			X				
2		e. The carbon (or equivalent) injection system operating parameter data for the parameter(s) that are the primary indicator(s) of carbon (or equivalent) feed rate.													X			X				
2		4. As required by 310 CMR 7.08(2)(h)13., for municipal waste combustor units that apply carbon (or equivalent) for Hg or dioxin/furan control:																				
2		a. Identification of the calendar dates when the average carbon (or equivalent) mass feed rates recorded under 310 CMR 7.08(2)(h)4.c were less than either of the hourly carbon feed rates estimated during compliance tests for Hg or dioxin/furan emissions and recorded under 310 CMR 7.08(2)(h) 4. a. or b., respectively, with reasons for such feed rates and a description of corrective actions taken													X			X				

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			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
2		b. Identification of the calendar dates when the carbon injection (or equivalent) system operating parameter(s) that are the primary indicator(s) of carbon mass feed rate (or equivalent) recorded under 310 CMR 7.08(2)(h) 4. e., are below the level(s) estimated during the compliance tests as specified in 40 CFR 60.58b(m)(1)(i) and 60.58b(m)(1)(ii), as amended, with reasons for such occurrences and a description of corrective actions taken.													X			X				
2		5. In accordance with 310 CMR 7.08(2)(h)2., the facility shall record the emission concentrations and parameters measured using continuous emissions monitoring systems The measurements specified below shall be recorded and shall be available for submittal to MassDEP or for onsite review by an inspector													X			X				
2		a. All 6-minute block averages of opacity levels as specified under 40 CFR 60.58b(c), as amended, including the highest level measured													X			X				
2		b. All 1-hour block averages of SO2 emission concentrations as specified under 40 CFR 60.58b(e), as amended.													X			X				
2		c. All 1-hour block averages of NOx emission concentrations as specified under 40 CFR 60.58b(h), as amended.													X			X				
2		d. All 1-hour block averages of CO emission concentrations, municipal waste combustor unit load measurements, and PM control device inlet temperatures as specified under 40 CFR 60 58b(i), as amended.													X			X				
2		e. All 24-hour daily geometric average SO2 emission concentrations and all 24-hour daily geometric averages of percent reductions in SO2 emissions as applicable, as specified under 40 CFR 60.58b(e), as amended, including the highest level recorded.													X			X				
2		f. All 24-hour daily arithmetic average NOx emission concentrations as specified under 40 CFR 60.58b(h), as amended, including the highest level recorded.													X			X				
2		g. All 4-hour block averages of CO emission concentrations, as applicable, as specified under 40 CFR 60 58b(i), as amended, including the highest level recorded													X			X				
2		h. All 4-hour block arithmetic averages of municipal waste combustor unit load levels (steam flow) and PM control device inlet temperatures as specified under 40 CFR 60.58b(i), as amended, including the highest level recorded.													X			X				
2		6. As required by 310 CMR 7.08(2)(h)3., the facility shall record the calendar dates when any of the average emissions concentrations or percent reductions, or operating parameters recorded under 310 CMR 7.08(2)(h)2., exceed the applicable limits, with detailed specific reasons for such exceedances and a description of corrective actions taken.													X			X				
2		7. As required by 310 CMR 7 08(2)(h)5., the facility shall record the calendar dates and time periods for which the minimum number of hours of any of the data specified below have not been obtained including reasons for not obtaining sufficient data and a description of corrective actions taken.																				
2		a SO2 emissions data,													X			X				
2		b. NOx emissions data,													X			X				
2		c. CO emissions data,													X			X				

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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NOTE: Y=Yes; N=No; C=Continuous; I=Intermittent			Em. Limit/Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
2		d. Municipal waste combustor unit load data,													X			X				
2		e. PM control device inlet temperature data													X			X				
2		8. As required by 310 CMR 7.08(2)(h)6., the facility shall record each occurrence that SO2 emissions data, NOx emissions data, or operational data (e.g. CO emissions, unit load, and PM control device inlet temperature) have been excluded from the calculation of average emission concentrations or parameters, along with detailed and specific reasons for excluding the data.													X			X				
2		9. As required by 310 CMR 7.08(2)(h)7., the facility shall record the results of daily drift tests and quarterly accuracy determinations for SO2, NOx, and CO continuous emission monitoring systems, as required under 40 CFR, Part 60, Appendix F, Procedure 1.													X			X				
2		10. As required by 310 CMR 7.08(2)(h)8., the facility shall maintain records of each occurrence of a start-up, shut-down or malfunction that results in an exceedance of the limits defined in Table 3, including the specific reasons for each occurrence, date, time, and unit involved. Average emissions concentrations or percent reductions, or operating parameters recorded under 310 CMR 7.08(2)(h)2., shall be recorded during start-up, shut-down or malfunction that results in an exceedance of the limits defined in Table 3.													X			X				
2		11. Consistent with Approval MBR-88-INC-004, the facility shall maintain records of the test results of every nine month test. In addition, the test results of every nine month test of the facility's ash shall be recorded. (State Only Requirement)													X			X				
2		12. In accordance with 310 CMR 7.08(2)(h)11., the facility shall maintain records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who are certified by ASME (Operator Certification and Provisional Certification), including the dates of initial and renewal certifications and documentation of current certification.													X			X				
2		The facility shall also maintain records showing the names of the municipal waste combustor chief facility operator, shift supervisors, and control room operators who have completed the EPA municipal waste combustor operator training course if required.													X			X				
2		13. In accordance with 310 CMR 7.08(2)(h)12., the facility shall maintain records showing the names of the persons who have completed a review of the operating manual as required by 310 CMR 7.08(2)(f)6.d., including the date of the initial review and subsequent annual reviews.													X			X				
2		14. In accordance with 310 CMR 7.08(2)(h)1., the facility shall maintain the calendar date of each record required above.													X			X				
2		15. In accordance with Approval MBR-88-INC-004, the facility shall maintain records documenting all maintenance performed on the furnaces, emission controls, ash handling system, and all required continuous emissions and other monitoring devices. (State Only Requirement)													X		X		THIS IS NOT A NEW DEVIATION: Annual calibration of the steam flow transmitters were conducted in June 2012, however the calibration record could not be located			

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 5:																				
2		16. In accordance with Approval MBR-88-INC-004, the facility shall maintain a copy of this Approval letter within the control room of the facility. Maintaining a copy of this Operating Permit within the control room of the facility shall be deemed compliance with this requirement (State Only Requirement)													X			X				
2		17. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2. and consistent with the requirements of Approval MBR-88-INC-004, the facility shall maintain records of the sulfur content of each shipment of fuel oil received in order to demonstrate compliance with the fuel sulfur content limit stated in Table 3	Shipments received were labeled as 15 ppm sulfur ULSD by the supplier.												X			X				
2		18. In accordance with 310 CMR 7.08(2)(h)9. and Approval MBR-98-ECP-006, maintain records of the results of all nine month compliance tests conducted to determine compliance with the fugitive ash emission limit, along with supporting calculations.													X			X				
2		19. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2. and consistent with the requirements of Approval MBR-92-INC-003, maintain records of the quarterly metals analysis performed on landfill leachate until such time that the leachate sampling program is discontinued by MassDEP pending review of the leachate data and compliance emissions test data. (State Only Requirement)													X			X				
2		20. In accordance with Approval MBR-92-INC-003, a copy of this Approval letter shall be maintained within the control room of the facility. Maintaining a copy of this Operating Permit within the control room of the facility shall be deemed compliance with this requirement. (State Only Requirement)													X			X				
2		21. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., maintain the test results of any other testing or testing methodology required by MassDEP or EPA.	All test results for parameters requested by MADEP are submitted and kept on-site												X			X				
2		22. Maintain records for the annual preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.													X			X				
2		23. Keep copies of Source Registration/Emission Statement Forms submitted annually to MassDEP as required per 310 CMR 7.12(3)(b).													X			X				
2		24. In accordance with 310 CMR 7.08(2)(h) and 310 CMR 7.00: Appendix C(10)(b), maintain records of all monitoring data and supporting information required by this Operating Permit on site for five (5) years from the date of the monitoring sample, measurement, report or initial Operating Permit Application. Said records shall be made available to MassDEP personnel upon request.													X		X		THIS IS NOT A NEW DEVIATION: Annual calibration of the steam flow transmitters were conducted in June 2012, however the calibration record could not be located			

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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NOTE: Y=Yes; N=No; C=Continuous; I=Intermittent			Em. Limit/Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 6:																				
1		1 As required by 310 CMR 7.08(2)(i), the facility shall submit an annual report of the information specified in 310 CMR 7.08(2)(i)1., as applicable. The facility which elects to follow the compliance testing schedule specified in 310 CMR 7.08(2)(g)1.b., shall follow the procedures specified in 310 CMR 7.08(2)(i)1. for reporting the selection of this schedule.																	X			X
1		Annual Reporting Requirements 1 – The information specified in a. through g. below shall be reported.																				
1		a. 310 CMR 7.08(2)(h)2.a., e. through h. for the highest emission levels recorded.																	X			X
1		b. 310 CMR 7.08(2)(h)4.a. and b.																	X			X
1		c. 310 CMR 7.08(2)(h)5 through 6.																	X			X
1		d. 310 CMR 7.08(2)(h)8. through 10																	X			X
1		e. Summary of a. through d. for the previous year.																	X			X
1		f. The performance evaluation of the continuous emission monitoring system using the applicable performance specifications in Appendix B of 40 CFR, Part 60.																	X			X
1		g. A notification of intent to begin the reduced dioxin/furan compliance testing schedule specified in 310 CMR 7.08(2)(g)1.b during the following calendar year.																	Not applicable during certification period.			
1		2 The facility shall submit a semiannual report that includes the information specified in 310 CMR 7.08(2)(i)2. for any recorded pollutant or parameter that does not comply with the emission limits as set forth in 310 CMR 7.08(2)																	X			X
1		Semi-Annual Reporting Requirements 2 - The information specified in a. through e. below shall be reported:																				
1		a. 310 CMR 7.08(2)(h)2.a., e. through h for each date recorded in 310 CMR 7.08(2)(h)3.																	X			X
1		b. 310 CMR 7.08(2)(h)3.																	X			X
1		c. 310 CMR 7.08(2)(h)4.c.																	X			X
1		d. 310 CMR 7.08(2)(h)9. 3																	X			X
1		e. 310 CMR 7.08(2)(h)13.																	X			X
1		3. As required by 310 CMR 7.08(2)(i), in meeting the reporting requirements of 310 CMR 7.08(2)(i)1 and 310 CMR 7.08(2)(i)2., the facility shall report the information in a format determined by MassDEP that is designed to be understandable and informative to the public. The information shall be submitted in written format and electronic format.																	X			X
1		4 In accordance with Approval MBR-88-INC-004, the facility shall submit to MassDEP, CEMS Excess Emission and Monitoring System Performance reports on a quarterly basis for opacity, SO2, NOx, and CO Such reports shall include																				
1		a. the date and time of commencement and completion of each period of excess emissions and the magnitude of the excess emissions for each hour; and,																	X			X
1		b. identification of the suspected reason for the excess emissions and any corrective action taken, and,																	X			X

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NOTE: Y=Yes; N=No; C=Continuous; I=Intermittent			Em. Limit/Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 6:																				
1		c. the date and time that any CEMS stopped collecting valid data and when it started to collect valid data again, except for zero and span checks (report only invalid one hour data averages); and,																	X			X
1		d. the nature and date of system repairs.																	X			X
1		In the event none of the above items have occurred, such information shall be stated in the report.																	X			X
1		Reportable excess emissions shall be defined as emissions in excess of the emission limits/standards defined in Table 3. The facility may use the reporting format required by 310 CMR 7.08 or some other format determined by MassDEP that is designed to be understandable and informative to the public.																	X			X
1		The report for each calendar quarter shall be submitted by the thirtieth (30th) day of April, July, October, and January covering the previous calendar periods of January through March, April through June, July through September, and October through December, respectively.																	X			X
1		5. In accordance with Approval MBR-88-INC-004, the facility shall report, emission test results to MassDEP within 60 days of completion of every nine month test The applicable pollutants for flyash/bottom ash analysis shall be reported in terms of weight/weight units in the ash. (State Only Requirement)																	X			X
1		6. In accordance with Approval MBR-88-INC-004, the facility shall submit: a) an Emissions Testing Protocol to MassDEP at least 60 days before commencement of emissions testing. The Emissions Testing Protocol shall contain a detailed description of all pollutants designated to be tested, sampling point locations, sampling equipment, sampling and analytical procedures, and operating conditions for the required testing All protocol submittals must be approved by MassDEP in writing prior to conducting such testing, and,																	X			X
1		b) a detailed Dispersion Modeling Protocol for the required maximum ground level ambient pollutant concentrations shall be submitted to MassDEP for written approval by MassDEP at least 60 days prior to commencement of data processing of modeling inputs. If the facility intends to follow a previously approved Emissions Testing Protocol or Dispersion Modeling Protocol, then the facility shall provide written notice, 60-days in advance of the commencement of testing or modeling activities. (7.(b) is State Only Requirement)																	X			X
1		7. Pursuant to MassDEP's authority through 310 CMR 7.00 Appendix C(9)(b)2 and consistent with the requirements of Approval MBR-92-INC-003, submit a report, containing the results of the metals analysis performed for each calendar quarter on the landfill leachate, by the thirtieth (30th) day of April, July, October, and January covering the previous calendar periods of January through March, April through June, July through September, and October through December, respectively. Said reports shall be submitted until such time that the leachate sampling program is discontinued by MassDEP pending review of the leachate data and compliance emissions test data (State Only Requirement)																	X			X

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 6:																				
1		8. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2 , submit the test results of any other testing or testing methodology required by MassDEP or EPA.																	X			X
1		9 Submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7 12.																	X			X
1		10. Submit by January 30 and July 30 for the previous six months respectively, a summary of all monitoring data and related supporting information to MassDEP as required by 310 CMR 7.00: Appendix C(10)(c)																	X			X
1		11. Submit Annual Compliance report to MassDEP and EPA by January 30 of each year and as required by General Condition 10.																	X			X
1		12. Promptly report to MassDEP all instances of deviations from Permit requirements by telephone or fax, within three days of discovery of such deviation, as provided in 310 CMR 7.00: Appendix C(10)(f). (See General Condition 25).																	X			X
1		13. All required reports must be certified by a responsible official as provided in 310 CMR 7.00: Appendix C(10)(h).																	X			X
2		1. As required by 310 CMR 7 08(2)(i), the facility shall submit an annual report of the information specified in 310 CMR 7.08(2)(i)1., as applicable The facility which elects to follow the compliance testing schedule specified in 310 CMR 7.08(2)(g)1.b., shall follow the procedures specified in 310 CMR 7.08(2)(i)1. for reporting the selection of this schedule.																	X			X
2		Annual Reporting Requirements 1 - The information specified in a. through g below shall be reported:																				
2		a. 310 CMR 7.08(2)(h)2.a., e. through h. for the highest emission levels recorded.																	X			X
2		b 310 CMR 7 08(2)(h)4 a and b.																	X			X
2		c 310 CMR 7 08(2)(h)5 through 6.																	X			X
2		d 310 CMR 7.08(2)(h)8. through 10.																	X			X
2		e. Summary of a. through d for the previous year																	X			X
2		f. The performance evaluation of the continuous emission monitoring system using the applicable performance specifications in Appendix B of 40 CFR, Part 60.																	X			X
2		g. A notification of intent to begin the reduced dioxin/furan compliance testing schedule specified in 310 CMR 7.08(2)(g)1.b. during the following calendar year.																	Not applicable during certification period.			
2		2. The facility shall submit a semiannual report that includes the information specified in 310 CMR 7.08(2)(i)2. for any recorded pollutant or parameter that does not comply with the emission limits as set forth in 310 CMR 7.08(2).																	X			X
2		Semi-Annual Reporting Requirements 2 - The information specified in a. through e. below shall be reported:																				
2		a. 310 CMR 7 08(2)(h)2.a., e. through h. for each date recorded in 310 CMR 7.08(2)(h)3.																	X			X
2		b 310 CMR 7.08(2)(h)3.																	X			X
2		c. 310 CMR 7.08(2)(h)4.c.																	X			X
2		d. 310 CMR 7.08(2)(h)9. 3																	X			X

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EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 6:																				
2		e. 310 CMR 7.08(2)(h)13.																	X			X
2		3. As required by 310 CMR 7.08(2)(i), in meeting the reporting requirements of 310 CMR 7.08(2)(i)1. and 310 CMR 7.08(2)(i)2., the facility shall report the information in a format determined by MassDEP that is designed to be understandable and informative to the public. The information shall be submitted in written format and electronic format.																	X			X
2		4. In accordance with Approval MBR-88-INC-004, the facility shall submit to MassDEP, CEMS Excess Emission and Monitoring System Performance reports on a quarterly basis for opacity, SO2, NOx, and CO. Such reports shall include																				
2		a. the date and time of commencement and completion of each period of excess emissions and the magnitude of the excess emissions for each hour; and,																	X			X
2		b. identification of the suspected reason for the excess emissions and any corrective action taken; and,																	X			X
2		c. the date and time that any CEMS stopped collecting valid data and when it started to collect valid data again, except for zero and span checks (report only invalid one hour data averages); and,																	X			X
2		d. the nature and date of system repairs.																	X			X
2		In the event none of the above items have occurred, such information shall be stated in the report																	X			X
2		Reportable excess emissions shall be defined as emissions in excess of the emission limits/standards defined in Table 3. The facility may use the reporting format required by 310 CMR 7.08 or some other format determined by MassDEP that is designed to be understandable and informative to the public																	X			X
2		The report for each calendar quarter shall be submitted by the thirtieth (30th) day of April, July, October, and January covering the previous calendar periods of January through March, April through June, July through September, and October through December, respectively.																	X			X
2		5. In accordance with Approval MBR-88-INC-004, the facility shall report, emission test results to MassDEP within 60 days of completion of every nine month test. The applicable pollutants for flyash/bottom ash analysis shall be reported in terms of weight/weight units in the ash. (State Only Requirement)																	X			X
2		6. In accordance with Approval MBR-88-INC-004, the facility shall submit: a) an Emissions Testing Protocol to MassDEP at least 60 days before commencement of emissions testing. The Emissions Testing Protocol shall contain a detailed description of all pollutants designated to be tested, sampling point locations, sampling equipment, sampling and analytical procedures, and operating conditions for the required testing. All protocol submittals must be approved by MassDEP in writing prior to conducting such testing; and,																	X			X

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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EU#	Pollutant	Fuel/Raw Material/Restriction/Limitation/ Regulation/Approval Number	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
		REFERENCE TABLE 6:																				
2		b) a detailed Dispersion Modeling Protocol for the required maximum ground level ambient pollutant concentrations shall be submitted to MassDEP for written approval by MassDEP at least 60 days prior to commencement of data processing of modeling inputs. If the facility intends to follow a previously approved Emissions Testing Protocol or Dispersion Modeling Protocol, then the facility shall provide written notice, 60-days in advance of the commencement of testing or modeling activities. (7 (b) is State Only Requirement)																	X			X
2		7 Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2. and consistent with the requirements of Approval MBR-92-INC-003, submit a report, containing the results of the metals analysis performed for each calendar quarter on the landfill leachate, by the thirtieth (30th) day of April, July, October, and January covering the previous calendar periods of January through March, April through June, July through September, and October through December, respectively Said reports shall be submitted until such time that the leachate sampling program is discontinued by MassDEP pending review of the leachate data and compliance emissions test data (State Only Requirement)																	X			X
2		8. Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., submit the test results of any other testing or testing methodology required by MassDEP or EPA																	X			X
2		9. Submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7.12.																	X			X
2		10 Submit by January 30 and July 30 for the previous six months respectively, a summary of all monitoring data and related supporting information to MassDEP as required by 310 CMR 7.00: Appendix C(10)(c).																	X			X
2		11. Submit Annual Compliance report to MassDEP and EPA by January 30 of each year and as required by General Condition 10.																	X			X
2		12 Promptly report to MassDEP all instances of deviations from Permit requirements by telephone or fax, within three days of discovery of such deviation, as provided in 310 CMR 7.00: Appendix C(10)(f). (See General Condition 25).																	X			X
2		13 All required reports must be certified by a responsible official as provided in 310 CMR 7.00: Appendix C(10)(h).																	X			X

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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Special Terms & Conditions & Generally Applicable Requirements		COMMENT	Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	In accordance with 310 CMR 7.08(1)(g), no person shall cause, suffer, allow, or permit emissions from any incinerator of any particles that have a dimension greater than 100 microns. (State Only Requirement)	Compliance determination is based on meeting the monitoring, record keeping and reporting requirements related to the PM emission limit in Table 3					X			X	X			X	X			X
FW	No person subject to 310 CMR 7.08(2) shall cause, suffer, allow or permit the discharge into the atmosphere of any visible emissions of combustion ash from an ash conveying system (including transfer points) in excess of 5 percent of the observation period (nine minutes per three-hour period). This emission limit does not cover visible emissions discharged inside buildings or enclosures of ash conveying systems; however the emission limit does apply to visible emissions discharged to the atmosphere from buildings or enclosures of ash conveying systems. This emission limit does not apply during maintenance and repair of ash conveying systems. Maintenance and repair of the ash conveying systems.must be done in accordance with best management practices.	Compliance determination is based on meeting the monitoring, record keeping and reporting requirements related to the fugitive ash emission limit in Table 3					X			X	X			X	X			X
1&2	No person subject to 310 CMR 7.08(2) shall: cause, suffer, allow or permit a municipal waste combustor unit to operate at a load level (based on steam flow) greater than 110 percent of the maximum demonstrated municipal waste combustor unit load calculated in 4-hour block arithmetic averages, measured during the most recent dioxin/furan compliance test in which compliance is achieved; and	Compliance determination is based on meeting the monitoring, record keeping and reporting requirements related to the MWC Load limit in Table 3	X			X					X			X	X			X
1&2	No person subject to 310 CMR 7.08(2) shall: cause, suffer, allow or permit a municipal waste combustor unit to operate at a temperature, measured at the PM control device inlet, exceeding 17°C (30°F) above the maximum demonstrated PM control device temperature, calculated in 4-hour block arithmetic averages, measured during the most recent dioxin/furan compliance test in which compliance is achieved.	Compliance determination is based on meeting the monitoring, record keeping and reporting requirements related to the PMCD Inlet Temperature limit in Table 3	X			X					X			X	X			X
1&2	During any nine-month dioxin/furan compliance test and the 2 weeks preceding each nine-month dioxin/furan compliance test, municipal waste combustor unit load limit and PM control device temperature limitations are not applicable.	Not applicable during certification period.																
1&2	Municipal waste combustor unit load limit and PM control device temperature limitations may be waived, if prior approval is granted by MassDEP, for the purposes of evaluating system performance, testing new technology or control technologies, diagnostic testing, or related activities for the purpose of improving facility performance provided that there is an improvement in controlling air pollution, or advancing the state-of-the-art for controlling facility emissions.	Not applicable during certification period.																
1, 2 & 3	Emission limits apply at all times except during periods of start-up, shutdown or malfunction as defined in 40 CFR Part 60.58b, as amended.	Statement of fact																

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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Special Terms & Conditions & Generally Applicable Requirements		COMMENT	Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance - Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
1&2	In accordance with Approval MBR-98-ECP-006, based on the current NOx limit of 205 ppm by volume at 7% O2 dry basis, NH3 emissions from each MWC unit shall be limited to 10 ppm by volume at 7% O2 dry basis. Compliance with the NH3 emission limit/standard shall be based on a minimum of 3 compliance test runs on each MWC unit per compliance test, measured at the Spray Dryer Absorber inlet or Fabric Filter outlet, using EPA Test Method 26A or other test method approved by MassDEP. (State Only Requirement)	Compliance determination is based on meeting the monitoring, record keeping and reporting requirements related to the NH3 emission limit in Table 3					X			X	X			X	X			X
	In accordance with Approval MBR-92-INC-003, the facility may use untreated landfill leachate as a source of process water for the air pollution control system. (State Only Requirement)	Permission subject to the monitoring/testing, record keeping and reporting provisions identified in Tables 4, 5 & 6.					X			X	X			X	X			X
	In accordance with 310 CMR 7.08(2)(f)6. and 40 CFR Part 60, Subpart Eb, 60.54b, as amended, the facility shall implement the following municipal waste combustor operator training and certification requirements:																	
FW	The facility shall have each chief facility operator and shift supervisor obtain and maintain an Operator Certificate issued by the American Society of Mechanical Engineers (ASME).	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
FW	The facility shall not allow the municipal waste combustor unit to be operated at any time unless one of the following persons is on duty: A chief facility operator or a shift supervisor who has obtained an Operator Certificate. (A Provisional Certificate is acceptable provided the supervisor is scheduled to obtain an Operator Certificate in accordance with 310 CMR 7.08(2)(f). A provisionally certified operator who is newly promoted or recently transferred to a chief facility operator or a shift supervisor position may perform the duties of the certified chief facility operator or certified shift supervisor without notice to, or approval by, MassDEP or EPA for up to six (6) months before taking the ASME certification exam). If one of the persons listed above must leave the municipal waste combustor plant during his or her operating shift, a provisionally certified control room operator who is onsite at the municipal waste combustor plant may fulfill these requirements subject to 40 CFR Part 60, Subpart Eb, 60.54b, as amended	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
FW	When the certified chief facility operator or certified shift supervisor is off site for twelve (12) hours or less, and no certified operator is onsite, the provisionally certified control room operator may perform those duties without notice to, or approval by, MassDEP or EPA.	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				

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Special Terms & Conditions & Generally Applicable Requirements		COMMENT	Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	When the certified chief facility operator or certified shift supervisor is off site for more than twelve (12) hours, but for two (2) weeks or less, and no certified operator is onsite, the provisionally certified control room operator may perform those duties without notice to, or approval by, MassDEP or EPA. However, the facility owner or operator shall record the period when the certified chief facility operator or certified shift supervisor are off site and include that information in the annual report as specified under 40 CFR Part 60, Subpart Eb, 60.59b(g)(5), as amended, and 310 CMR 7.08(2)(1)1..	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
FW	When the certified chief facility operator or certified shift supervisor is off site for more than two weeks, and no other certified operator is onsite, the provisionally certified control room operator may perform those duties without approval by MassDEP or EPA. However, the facility must take the following two actions:	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
FW	MassDEP and EPA must be notified in writing. In the notice, the reasons that caused the absence and the actions being taken to ensure that a certified chief facility operator or certified shift supervisor is on site as expeditiously as practicable must be included.	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
FW	A written status report and corrective action summary must be submitted to MassDEP and EPA every four weeks following the initial notification. The facility shall include in each status summary a demonstration that a good faith effort has been made and continues to be made to ensure that a certified chief facility operator or certified shift supervisor is on site. If MassDEP or EPA provides notice that the status report or corrective action summary is disapproved, the MWC unit may continue operation for ninety (90) days, but then must cease operation. If corrective actions are taken in the ninety (90) day period such that MassDEP or EPA withdraws the disapproval, MWC unit operation may continue.	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
FW	The facility shall have all chief facility operators, shift supervisors, and control room operators who have not obtained an Operator Certificate from ASME complete the National Technical Information Service – "EPA Municipal Waste Combustor Operating Course".	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5. Annual and Initial training on the site specific Operations and Maintenance Manual deemed compliance with this requirement.									X			X				

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EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	The facility shall establish a training program to review the operating manual with each person who has responsibilities affecting the operation of an affected municipal waste combustor unit, including, but not limited to, chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers. Each person specified above shall undergo initial training no later than the date prior to the day the person assumes responsibilities affecting municipal waste combustor unit operation and annually thereafter. The site-specific operating manual shall be updated on a yearly basis and shall address at a minimum the following:										X		X		Not all affected employees received the annual refresher training by the end of the year. Not all affected employees received the initial training but did receive the annual training. All employees will receive the annual training by 2/15/2016.			
	A summary of all applicable requirements in this regulation;	Compliance determination based on review of training program and a review of records maintained to comply with the operator training and certification record keeping requirements in Table 5.									X			X				
	Basic combustion theory applicable to a municipal waste combustor unit;																	
	Procedures for receiving, handling, and feeding municipal solid waste;																	
	Municipal waste combustor unit startup, shutdown, and malfunction procedures;																	
	Procedures for maintaining proper combustion air supply levels,																	
	Procedures for operating the municipal waste combustor unit within the requirements established under this regulation;																	
	Procedures for responding to periodic upset or off-specification conditions;																	
	Procedures for minimizing PM carryover;																	
	Procedures for handling ash;																	
	Procedures for monitoring municipal waste combustor unit emissions;																	
	Reporting and record keeping procedures.																	
	The facility shall, upon request from MassDEP or EPA, make available all the operating manuals and records of training for inspection.										X			X				
	In accordance with Approval MBR-88-INC-004, MassDEP reserves the right to be present during staff training, particularly with respect to air pollution control equipment and continuous emissions monitoring systems (CEMS) operation. (State Only Requirement)										X			X				

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Special Terms & Conditions & Generally Applicable Requirements		COMMENT	Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	In accordance with Approval MBR-88-INC-004, the facility shall provide for abatement action in the Standard Operating and Maintenance Procedures (SOMP) which shall be initiated immediately should the installed equipment cause or contribute to a condition of air pollution due to the emission of smoke, noise, odor, dust, or wind blown refuse. The SOMP may be included in the operating manual identified in provision (f)4. above. (State Only Requirement)	Compliance determination based on review of O&M Manual, knowledge of operating practices and operator training.	X			X												
FW	In accordance with 310 CMR 7.08(2)(j)5. and Approval MBR-98-ECP-006, additional requirements may be included in an Emission Control Plan Approval if MassDEP determines that the emissions from a municipal waste combustor plant's unit(s) alone or cumulatively with other municipal waste combustor plant's unit(s) cause or contribute to a condition of air pollution or a violation of any other regulation. Such requirements would not be federally enforceable and would be subject to State enforcement only. These requirements could include but are not limited to emissions limits on air contaminants, and additional stack testing or emission monitoring requirements.	Applicable when triggered and not triggered during reporting period.																
FW	MassDEP may modify the Emission Control Plan at any time if MassDEP determines that a municipal waste combustor plant's unit(s) alone or cumulatively with other municipal waste combustor plant's unit(s) cause or contribute to a condition of air pollution or a violation of any other regulation.	Applicable when triggered and not triggered during reporting period.																
	Cumulative Impact: MassDEP has determined that a cumulative impact analysis was not warranted since no other municipal waste combustor facility is located within the vicinity of the facility.																	
FW	In accordance with 310 CMR 7.08(2)(a) and Approval MBR-98-ECP-006, no person shall allow, or permit the construction, substantial reconstruction, alteration or operation of a municipal waste combustor unit on a site which has not received a site assignment in accordance with M.G.L. c.111, s.150A. (State Only Requirement)	Facility has a valid site asignment.	X			X					X			X				
FW	In accordance with Approval MBR-88-INC-004, there shall be no burning or unpermitted storage of hazardous waste as defined in 310 CMR 7.00, infectious wastes, asbestos, sewage sludge (combustion of which is prohibited by Approval MBR-98-ECP-006) or other noncompatible wastes at this facility. Waste compatibility shall be determined by MassDEP on a case by case basis upon receipt of a written request/application.	Compliance determination based on review of waste delivery records, waste screening, knowledge of operating practices and operator training.	X			X												
FW	In accordance with Approval MBR-88-INC-004, the facility shall ensure that any storage or transport of material collected from the facility's boiler grates and emission control systems shall be done in covered, leak proof containers or other methods equally effective in preventing fugitive dust during storage and transfer. Compliance with the fugitive emission limit/standard in Table 3 shall be deemed compliance with this requirement. (State Only Requirement)	Compliance determination based on knowledge of operating practices and operator training and fugitive emission testing completed in April during ash and metals loadout.	X			X												

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Special Terms & Conditions & Generally Applicable Requirements		COMMENT	Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	In accordance with Approval MBR-88-INC-004, the municipal solid waste shall not be introduced to the boiler grates until such time as operating temperature is attained. Operating temperature is considered to be the turbulent flue gas temperature at 1800 Degrees Fahrenheit (F) for at least one-second retention time, except for periods during boiler start-up and shutdown. During start-up and shutdown periods, auxiliary fuel shall be used to maintain a minimum turbulent flue gas temperature of 1500 Degrees F for at least one-second retention time within the combustion zone. (State Only Requirement)	Compliance determination is based on use of oil burners and temperature sensors as part of normal operating procedures during startup and shutdown.	X		X		On 12/12/2015, during the tail end of the warm-up period of EU2, the auxiliary oil burners tripped out (due to low drum level) and the warm-up was finished with MSW											
FW	In accordance with Approval MBR-88-INC-004, no waste shall be stored outside the facility's enclosed tipping floor/reception area. (State Only Requirement)	Compliance determination based on review of O&M Manual, knowledge of operating practices and operator training.	X			X												
FW	In accordance with Approval MBR-88-INC-004, MassDEP reserves the right to require continuous emission monitoring (CEM) for hydrogen chloride (HCl) in the future. (State Only Requirement)	Applicable when triggered and not triggered during reporting period.																
FW	In accordance with Approval MBR-88-INC-004, the facility shall test for specific pollutants, listed in MassDEP's Revised Air Guidelines of December 6, 1995, *if* and when requested by MassDEP. The facility shall comply with all Threshold Effects Exposure Limits (TEL) and Allowable Ambient Limits (AAL) for said pollutants, as determined by the most recent MGL 21H Subpart 5C Emissions Stack Test. (State Only Requirement)	Applicable when triggered and not triggered during reporting period.																
1 & 2	In accordance with Approval MBR-88-INC-004, the facility shall immediately review, document and optimize the operation of the air pollution control system, combustion control system, and auxilaries upon the failure of any portion of the CEM system that would jeopardize the accumulation of accurate pollutant concentrations. The facility shall utilize these process parameters as surrogate indicators of process performance in accordance with federal regulations at 40 CFR Parts 51, 52, and 60, New Source Performance Standards (NSPS) as described within the CEMS standard operating procedures. Permitting Note: The plant control system continuously monitors and records all key air pollution control, combustion control and auxiliary parameters to document operation. In the event a CEM system fails to obtain valid hourly average pollutant concentrations, the operator shall monitor and make the necessary adjustments to ensure requisite parameters are maintained within normal operating ranges.	Compliance determination based on knowledge of operating practices and operator training.	X			X												

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Special Terms & Conditions & Generally Applicable Requirements		COMMENT	Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
			Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
1 & 2	In accordance with Approval MBR-88-INC-004, any flue gas bypass system whose purpose is to reroute the combustion products from the incineration of Municipal Solid Waste (MSW) within the boiler/incineration units to the ambient environment without benefit of air pollution control is prohibited. Only during a "cold iron start-up", while firing fuel oil only (no MSW/Refuse being charged) will flue gas diversion of the Fabric Filter Bag House be allowed. The diversion of flue gas in this limited operational mode is permissible to prevent "blinding" of the fabric filter bags. A legally enforceable interlock system shall be maintained to prevent the diversion of MSW effluent combustion gas products during normal boiler/incineration unit operation. Any "cold iron start-up" diversion episodes shall be reported to MassDEP by telephone and/or fax and subsequently in writing, attention Bureau of Waste Prevention Permit Chief, within seven (7) days of the occurrence of the episode.	Bypass Disabled																
FW	In accordance with Approval MBR-98-ECP-006, should any nuisance condition(s) occur as a result of the operation of this facility, then appropriate steps shall immediately be taken by the facility to abate said nuisance condition(s).	Compliance determination based on knowledge of operating practices and operator training.	X			X												
1 &2	In accordance with Approval MBR-98-ECP-006 and 310 CMR 7.08(2), following performance tests for Dioxin\Furan or Mercury emissions, the facility shall operate with carbon mass feed rate that equals or exceeds the average that was determined during the performance test: Compliance with this minimum feed rate will be based on carbon mass feed rate 8-hour block averages, in pounds per hour (lbs/hr)		X			X	X			X	X			X	X			X
1 &2	Per data as supplied through the Permittee's Operating Permit Application (MBR-95-OPP-011, Transmittal No. 108024), EU1 and EU2 shall continue to emit products of combustion through two (2) separate flues (Flue 1 and 2, respectively) contained in an existing stack, each flue having the following parameters: Flue 1 Flue Height 286.25 feet Flue Exit Diameter 7.1 feet Flue Material Steel Flue 2 Flue Height 286.25 feet Flue Exit Diameter 7.1 feet Flue Material Steel	Compliance determination based on knowledge of initial facility design and subsequent facility modifications.									X			X				
FW	The Permittee is subject to, and has stated in their Operating Permit Application (MBR-95-OPP-011, Transmittal No. 108024), that they are in compliance with the requirements of 40 CFR Part 82: Protection of Stratospheric Ozone. These requirements are applicable to this facility and EPA enforces these requirements.		X			X					X			X				

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Alternative Operating Scenarios		Em. Limit/Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Alternative Operating Scenarios	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance - Was?	
		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	The Permittee did not request alternative operating scenarios in its Operating Permit Application.																				

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Emissions Trading		Em. Limit/Restriction: Table 3				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Emissions Trading	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	(a) Intra-facility emissions trading																				
	The Permittee did not request intra-facility emissions trading in its Operating Permit Application.																				
	Pursuant to 310 CMR 7.00: Appendix C(7)(b), emissions trades, provided for in this Permit, may be implemented provided the Permittee notifies The United States Environmental Protection Agency (EPA) and MassDEP at least fifteen (15) days in advance of the proposed changes and the Permittee provides the information required in 310 CMR 7.00: Appendix C(7)(b)3.																				
	Any intra-facility change that does not qualify pursuant to 310 CMR 7.00 Appendix C(7)(b)2. is required to be submitted to MassDEP pursuant to 310 CMR 7.00: Appendix B.																				
	(b) Inter-facility emissions trading																				
	The Permittee did not request inter-facility emissions trading in its Operating Permit Application.																				
	All increases in emissions due to emissions trading, must be authorized under the applicable requirements of 310 CMR 7.00: Appendix B (the "Emissions Trading Program") and 42 U.S.C. §7401 et seq. (the "Act"), and provided for in this Permit.																				

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Special Terms & Conditions & Generally Applicable Requirements		~~Em. Limit/Restriction: Table 3~~				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	FEES	COMPLIANCE STATUS																			
	The Permittee has paid the Permit Application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00	X			X																
FW	COMPLIANCE CERTIFICATION																	COMPLIANCE STATUS			
	All documents submitted to MassDEP shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:																	X			X
	"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."																				
	MassDEP has made available to the Permittee via MassDEP's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm#op, an "Operating Permit Reporting Kit". The "Operating Permit Reporting Kit" contains instructions, and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification.																				
	a. Annual Compliance Report and Certification																				
	The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this Permit. The report shall be postmarked or delivered by January 30 to MassDEP and to the Regional Administrator, United States Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.																	X			X
	The compliance certification and report shall describe.																				
	i. the terms and conditions of the Permit that are the basis of the certification;																				
	ii. the current compliance status and whether compliance was continuous or intermittent during the reporting period;																				
	iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and																				
	iv any additional information required by MassDEP to determine the compliance status of the source.																				
	b. Semi-Annual Monitoring Summary Report and Certification																				
	The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this Permit. The report shall be postmarked or delivered by January 30 and July 30 to MassDEP. The report shall be submitted in compliance with the submission requirements below.																	X			X
	The compliance certification and report shall describe:																				
	i. the terms and conditions of the Permit that are the basis of the certification;																				
	ii. the current compliance status during the reporting period;																				

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Special Terms & Conditions & Generally Applicable Requirements		~~Em. Limit/Restriction: Table 3~~				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
	iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;																				
	iv. whether there were any deviations during the reporting period;																				
	v. if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;																				
	vi. whether deviations in the reporting period were previously reported;																				
	vii. if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance,																				
	viii. if the deviations in the reporting period have returned to compliance and date of such return to compliance; and																				
	ix. any additional information required by MassDEP to determine the compliance status of the source.																				
FW	NONCOMPLIANCE																				
	Any noncompliance with a Permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for Permit termination or revocation, or for denial of an Operating Permit Renewal Application by MassDEP and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.	X			X																
FW	PERMIT SHIELD	COMPLIANCE STATUS																			
	(a) This facility has a Permit shield provided that it operates in compliance with the terms and conditions of this Permit. Compliance with the terms and conditions of this Permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7 for the emission units as described in the Permittee's Application and as identified in this Permit	X			X																
	Where there is a conflict between the terms and conditions of this Permit and any earlier Approval or Permit, the terms and conditions of this Permit control.																				
	(b) MassDEP has determined that the Permittee is not currently subject to the requirements listed in Section 4, Part D., Table 7.																				
	(c) Nothing in this Permit shall alter or affect the following:																				
	i. the liability of the source for any violation of applicable requirements prior to or at the time of Permit issuance.																				
	ii. the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or																				
	iii. the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Clean Air Act																				

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

Air Operating Permit Annual Compliance Report

Special Terms & Conditions & Generally Applicable Requirements		~~Em. Limit/Restriction: Table 3~~				Monitoring: Table 4				Testing: Table 4				Record Keeping: Table 5				Reporting: Table 6			
EU# or Facility Wide	Special Term or Condition or Generally Applicable Requirement	Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?		Currently In Compliance?		Compliance Was?	
		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	ENFORCEMENT	COMPLIANCE STATUS																			
	The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.02(8)(i), 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Clean Air Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A.	X			X																
	All other terms and conditions contained in this Permit, including any provisions designed to limit a facility's potential to emit, are enforceable by MassDEP, EPA, and citizens as defined under the Clean Air Act.																				
	A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.																				
FW	PERMIT TERM	COMPLIANCE STATUS																			
	This Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date five (5) years after issuance of this Permit.	X			X																
	Permit expiration terminates the Permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this Permit, unless a timely and complete Renewal Application is submitted at least 6 months before the expiration date.																				
FW	PERMIT RENEWAL	COMPLIANCE STATUS																			
	Upon MassDEP's receipt of a complete and timely Application for renewal, this facility may continue to operate subject to final action by MassDEP on the Renewal Application.	X			X																
	In the event MassDEP has not taken final action on the Operating Permit Renewal Application prior to this Permit's expiration date, this Permit shall remain in effect until MassDEP takes final action on the Renewal Application, provided that a timely and complete Renewal Application has been submitted in accordance with 310 CMR 7.00: Appendix C(13).																				
FW	REOPENING FOR CAUSE	COMPLIANCE STATUS																			
	This Permit may be modified, revoked, reopened, and reissued, or terminated for cause by MassDEP and/or EPA. The responsible official of the facility may request that MassDEP terminate the facility's Operating Permit for cause. MassDEP will reopen and amend this Permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).	X			X																
	The filing of a request by the Permittee for an Operating Permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any Operating Permit condition.																				

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	DUTY TO PROVIDE INFORMATION	COMPLIANCE STATUS																			
	Upon MassDEP's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to MassDEP copies of records that the Permittee is required to retain by this Permit.	X			X																
FW	DUTY TO SUPPLEMENT	COMPLIANCE STATUS																			
	The Permittee, upon becoming aware that any relevant facts were omitted or that incorrect information was submitted in the Permit Application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete Renewal Application was submitted but prior to release of a Draft Permit.	X			X																
	The Permittee shall promptly, on discovery, report to MassDEP a material error or omission in any records, reports, plans; or other documents previously provided to MassDEP.																				
FW	TRANSFER OF OWNERSHIP OR OPERATION	COMPLIANCE STATUS																			
	This Permit is not transferable by the Permittee unless done in accordance with 310 CMR 7.00: Appendix C(8)(a). A change in ownership or operation control is considered an Administrative Permit Amendment if no other change in the Permit is necessary and provided that a written agreement containing a specific date for transfer of Permit responsibility, coverage and liability between current and new Permittee, has been submitted to MassDEP.	X			X																
FW	PROPERTY RIGHTS	COMPLIANCE STATUS																			
	This Permit does not convey any property rights of any sort, or any exclusive privilege.	X			X																
FW	INSPECTION AND ENTRY																				
	Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of MassDEP and EPA to perform the following, as per 310 CMR 7.00: Appendix C(3)(g)12.:	X			X																
	(a) enter upon the Permittee's premises where an Operating Permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;																				
	(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;																				
	(c) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and																				
	(d) sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the Operating Permit or applicable requirements.																				
FW	PERMIT AVAILABILITY	COMPLIANCE STATUS																			

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		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
	The Permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C(10)(e) and shall provide a copy of the Permit, including any amendments or attachments thereto, upon request by MassDEP or EPA	X			X																
FW	SEVERABILITY CLAUSE	COMPLIANCE STATUS																			
	The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.	X			X																
FW	EMERGENCY CONDITIONS																	COMPLIANCE STATUS			
	The Permittee shall be shielded from enforcement action brought for noncompliance with technology based[1] emission limitations specified in this Permit as a result of an emergency[2]. In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:																	X			X
	[1] Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.																				
	[2] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.																				
	(a) an emergency occurred and that the Permittee can identify the cause(s) of the emergency;																				
	(b) the permitted facility was at the time being properly operated;																				
	(c) during the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and																				
	(d) the Permittee submitted notice of the emergency to MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.																				
	If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.																				
FW	PERMIT DEVIATION																	COMPLIANCE STATUS			

Facility Name: Wheelabrator Saugus Inc. Facility Address: 100 Salem Turnpike Saugus SSEIS No: 1197654 Transmittal No. 108024 Date of Issuance: 10/19/2007

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		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
	Deviations are instances where any Permit condition is violated and not reported as an emergency pursuant to Section 24 of this Permit. Reporting a Permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6 of this Operating Permit shall supercede the following deviation reporting requirements, if applicable.																	X			X
	The Permittee shall report to MassDEP's Regional Bureau of Waste Prevention the following deviations from Permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:																				
	· Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.																				
	· Exceedances of parameter limits established by your Operating Permit or other Approvals, where the parameter limit is identified by the Permit or Approval as surrogate for an emission limit.																				
	· Exceedances of Permit operational limitations directly correlated to excess emissions																				
	· Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes; regulations, your Operating Permit, or other Approvals.																				
	· Failure to perform QA/QC measures as required by your Operating Permit or other Approvals for instruments that directly monitor compliance.																				
	For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the Massachusetts Department of Environmental Protection Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available via MassDEP's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm#op. This report shall include the deviation, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.																				
	Deviations that were reported by telephone or fax within three (3) days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the Regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations that do not require three (3) day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification																				
FW	OPERATIONAL FLEXIBILITY	COMPLIANCE STATUS																			
	The Permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the Permit and in compliance with all applicable requirements provided the Permittee gives the EPA and MassDEP written notice fifteen (15) days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (r). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the facility's Permit. The Permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.	X			X																

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		Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C	Y	N	I	C
FW	MODIFICATIONS	COMPLIANCE STATUS																			
	(a) Administrative Amendments - The Permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).	X			X																
	(b) Minor Modifications - The Permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2.,provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d)	X			X																
	(c) Significant Modifications - The Permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(e)	X			X																
	(d) No Permit revision shall be required, under any approved economic incentives program, marketable Permits program, emission trading program and other similar programs or processes, for changes that are provided in this Operating Permit. A revision to the Permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Clean Air Act, provided that such increases do not require an Operating Permit revision under any other applicable requirement.	X			X																

ATTACHMENT E
Operating Permit Cross-Reference Form

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Business Compliance Division
Operating Permit Cross Reference Form

EU No.(s)	Deviation Date(s)	Type of Deviation	Return to Compliance Plan Date or Date Returned to Compliance
EU1	7/21/2015	PCDD/DF > 30 ng/dscm@7% O2	8/21/2015 demonstrated levels below 30 ng/DSCM@7%O2
FW	12/31/2015	Training, all affected employees did not complete annual O&M manual review; not all affected employees completed initial O&M manual training but subsequently completed annual training	Annual training completed for employees by 2/15/2016.
EU2	12/12/2015	MSW introduced at end of warm up period after auxiliary burners tripped out	12/12/2015