Section VI
Fluidized Bed Incinerator

MODIFIED CONSENT DECREE SECTION VIII, PARAGRAPH 15. CLEAN AIR ACT REMEDIAL MEASURES

Paragraph 15. This paragraph requires the Board to operate its fluidized bed incinerator as per the Operation and Maintenance Plan for the Fluidized Bed Incinerator for the East Bank Plant, Modified Exhibit 1 of the Modified Consent Decree. This paragraph also requires the Board to comply with the requirements of the Incinerator Plan and submit reports as required by Paragraph 56 (c) to document proper compliance with the Incinerator Plan.

Work Accomplished

- The Board contracts with Veolia Water North America Operating Services, LLC to operate the East Bank Sewage Treatment Plant. On the introduction page of Appendix E, the Board has provided a letter from Veolia confirming compliance with this requirement.

Paragraph 56(c). This paragraph requires that the quarterly report contain information related to the following four areas:

1. Periodic Inspection of the FBI's Wet Scrubber for integrity and function
2. Periodic Inspections of Monitoring Devices
3. Dates of Calibration of Monitoring Devices
4. Verification that the FBI is conducted in accordance with the FBI O&M Plan. (also required in Paragraph 15; see above)

Work Accomplished:

- A copy of the "Quarterly Report on the FBI O&M Plan of the Eastbank Wastewater Treatment Facility" is located in Appendix E, Sections 1 – 5. This report is prepared by Veolia Water Company.

The FBI was off-line for the majority of the first quarter, 2012 due to catastrophic failure of the unit's heat exchanger. An attempt was made to incinerate by passing the heat exchanger for a period of time in February 2012. However, the cost of this bypass operation and the diminished incineration capacity made this a less viable option. A replacement heat exchanger has been procured and its delivery is expected in 18 weeks. In the interim, disposal of sludge materials is accomplished by trucking to a landfill.