The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Pichard, Errin
Sent: Friday, January 08, 2010 10:31 AM
To: 'Gorrie,Jason'
Cc: Henry, Danielle D.; 'Waters, Jason'; Satyal, Ajaya; Shine, Caroline
Subject: RE: Method 26 Modification Request

Mr. Gorrie-

Based on the information provided, the minor modification to the Method 26 train is acceptable.

Thanks,
Errin Pichard, Administrator
Emissions Monitoring Section
850-921-9580

From: Gorrie,Jason [mailto:jgorrie@CovantaEnergy.com]
Sent: Wednesday, December 16, 2009 3:13 PM
To: Pichard, Errin
Subject: RE: Method 26 Modification Request

I asked Testar to address the concerns that you raised below. They provided the attached Table as a side-by-side comparison if it helps.

Thanks.

Jason M. Gorrie, P.E.
Regional Environmental Manager
COVANTA
ENERGY
for a cleaner world
Covanta Energy Corporation
350 N. Falkenburg Rd.
Tampa, Florida 33619
813.684.5688 ext.3015 Cellular: 813.215.2266
www.CovantaHolding.com

Please consider the environment before printing this email.

From: Pichard, Errin [mailto:Errin.Pichard@dep.state.fl.us]
Sent: Thursday, December 10, 2009 3:11 PM
To: Gorrie,Jason
Subject: RE: Method 26 Modification Request

2

Hillsborough County has requested the opportunity to comment on the proposed changes since one of their regulated facilities would be impacted (I presume you will also be sending this to our Southwest District office in Tampa?). I asked them this morning if they still intend to comment and they said they do.

You can always the test protocols with the proposed test modifications included, with an explanation that the modifications are currently under review.

I don't know what, if any, concerns Hillsborough County might have, but just as a "heads-up" from my perspective I would want confirmation that either (a) the sample rate will be approximately that which would be required by Method 26A, or (b) some information demonstrating that using the lower sample rate of Method 26 will be sufficient to ensure detection.

I'll let you know as soon as I hear something.

Errin Pichard

From: Gorrie,Jason [mailto:jgorrie@CovantaEnergy.com]
Sent: Thursday, December 10, 2009 2:52 PM
To: Pichard, Errin
Subject: RE: Method 26 Modification Request

Mr. Pichard:

Our Lake County and Lee County facilities are scheduled for stack testing in January. We are in the process of preparing the Source Test Plans for submittal to the Central and South Districts. Do you have any update on our request for a minor modification to the M26 train?

Jason M. Gorrie, P.E.
Regional Environmental Manager
COVANTA
ENERGY
for a cleaner world
Covanta Energy Corporation
350 N. Falkenburg Rd.
Tampa, Florida 33619
813.684.5688 ext.3015 Cellular: 813.215.2266
www.CovantaHolding.com

Please consider the environment before printing this email.

From: Gorrie,Jason
Sent: Thursday, November 19, 2009 1:40 PM
To: 'Errin.Pichard@dep.state.fl.us'
Cc: Ta,Viet; Chardo,Kristen; Aldina,Joe; 'testarinc@netzero.com'
Subject: Method 26 Modification Request

Mr. Pichard

Attached, please find a request for a minor modification to the sampling methodology for Method 26 that is used at the 4 waste-to-energy facilities Covanta operates in the state of Florida. The Southwest District has requested that we file this

3

formal request through your Department. If it is administratively necessary to file individual requests for each facility please advise and I will make sure that this is accomplished.

If you have any questions, please do not hesitate to contact me at either of the numbers below. I will submit a hard copy of this request through the US Mail.

Thank you.

Jason M. Gorrie, P.E.
Regional Environmental Manager
COVANTA
ENERGY
for a cleaner world
Covanta Energy Corporation
350 N. Falkenburg Rd.
Tampa, Florida 33619
813.684.5688 ext.3015 Cellular: 813.215.2266
www.CovantaHolding.com

Please consider the environment before printing this email.

4

Parameter	Method 26	Modified Method 26
Initial Reagent volume	15 mL	200 mL
Final Reagent volume (including DI rinse)	50 ml	500 ml
Analytical Detection limit	0.005 mg	0.40 mg
Sampling rate	2 Liters per minute	0.75 ft3 per minute
Sampling time	60 minutes	60 minutes
Sample Volume (flue gas)	120 Liters (4.23 ft3)	45 ft3
In Stack detection limit	0.025 ppmvd	0.20 ppmvd
Permit limit	29 ppmvd @ 7%O2	29 ppmvd @ 7%O2
Safety factor (relative to permit limt)	1145	145

As of 10/15/10, 12:12 PM TESTAR, Inc.

Covanta Energy Corporation
350 North Falkenburg Road
Tampa, FL 33619
Phone: (813) 684-5688

November 19, 2009

Errin Pichard, P.E. Program Administrator
Emissions Monitoring Section
FDEP, Div. of Air Resource Management, MS 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Request for Minor Changes in Methodology for EPA Test Method 26
Lake County Resource Recovery Facility, Title V Permit 0690046-006-AV
Pasco County Resource Recovery Facility, Title V Permit 1010056-006-AV
Hillsborough County Resource Recovery Facility, Title V Permit 0570261-006-AV (and 0570261-007-AC)
Lee County Resource Recovery Facility, Title V Permit 0710119-006-AV

Dear Mr. Pichard:

Covanta Energy requests two minor changes in the methodology for Environmental Protection Agency (EPA) Test Method 26 that is used for measuring Hydrogen Chloride (HCl) emissions during the annual stack testing at the above-referenced facilities:

1). Full-sized impingers in lieu of midget impingers - The EPA Method 26 calls for midget-sized impingers in the sampling train. Testar, Inc., one of the stack testing companies that performs the testing on behalf of Covanta Energy, has advised us that full-sized impingers provide assurance that a sufficient volume of sample will be obtained during the sampling runs. Due to the the high static pressure within the stack, the absorbing solution within the midget-sized impingers can be evacuated, resulting in a lost sample and voided run. Therefore, Covanta Energy respectfully requests the Department's approval in the use of full-sized impingers for EPA Method 26 testing.

2). De-ionized water in lieu of Sodium hydroxide (NaOH) - EPA Method 26 is an approved method for measuring both hydrogen halides (HCl, HBr, HF) and halogens (Cl_2, Br_2). The sampling train for EPA Method 26 is set up so that the 1st and 2nd impingers contain 0.1N H_2SO_4 for the collection of hydrogen halides, the 3rd and 4th impingers contain 0.1N NaOH for the collect ion of halogens, and the 5th impinger contains silica gel. Because the annual compliance stack test at the referenced facilities does not require halogen testing, we are requesting that liquid in the two NaOH impingers be replaced with De-ionized water.

H:\Regional\Method 26 modification request letter 11_19_09.doc

Mr. Errin Pichard
November 19, 2009
Page 2

For your reference, attached is correspondence between a similar facility (North County Resource Recovery Facility located in West Palm Beach, FL) and the Department, which documents the Department's approval of similar modifications to EPA Method 26, as requested by the Solid Waste Authority of Palm Beach County.

If additional information is needed, please do not hesitate to contact me at (813) 215-2266.

Sincerely,

Jason M. Gorrie, PE
Regional Environmental Manager
Covanta Energy Corporation

c: V. Ta, Pasco
K. Chardo, Lee
J. Aldina, Fairfield
H. Dixon, Testar

H:\Regional\Method 26 modification request letter 11_19_09.doc