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BUREAU OF AIR REGULATION

Mr. Michael Sole
Assistant Secretary
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

July 12, 2006

Reference: Hillsborough County Resource Recovery Facility Expansion Project
DEP File No. 0570261-007-AC (PSD-FL-369, PA 82-19A)

Dear Mike,

On behalf of all of us at Covanta, I would like to thank you and the other members of the Department that participated in the Friday afternoon conference call (June 30, 2006) for taking the time to discuss with us the current status of the above referenced permit application filed by our Client Community, Hillsborough County, FL.

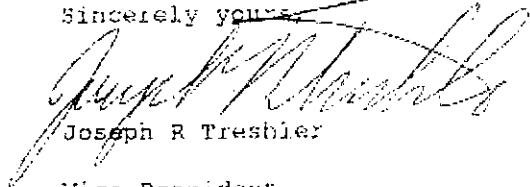
We understand that any requested changes at this time would require re-noticing the upcoming hearings, and would potentially delay issuance of the permit into 2007. As was stated during the call it is not our intent to challenge the permit conditions set forth by the Department in the draft permit, our goal was to open a dialogue with the Department by which we could express to you our serious concerns about the NOX and Ammonia slip limits suggested by the Department for this, and by default, all future WTE Facility Expansion Projects. The Department has suggested limits that have not been demonstrated to be coincidentally achievable at any existing WTE facility based on the technical data available to us in contrast to the well supported limits suggested in the County's Application and BACT Analysis.

We and our Client Community, Hillsborough County agree with you that it is imperative that we meet directly with you and members of the Department Air Section once the Hillsborough permit is issued to share and discuss Covanta's NOX control technical experience base. Such a meeting is important and appropriate to discuss how relevant evolving emissions data and operating experiences can best support the new permit limits.

We feel that this meeting would be most appropriate to convene once operating data becomes available from the Lee County WTE Facility Expansion Project that is currently in construction. The current project schedule anticipates construction completion and performance testing of the Lee WTE Expansion Project to occur during mid 2007. We will keep you posted on the construction progress of the Lee Project, and would welcome input from the Department as to the overall agenda for this meeting so that we all can be well prepared once a date is finally set.

Once again, thank you for making time for us to discuss our concerns.

Sincerely yours,



Joseph R Treshler

Vice President
Covanta Hillsborough, Inc.

Cc:	Tom Smith	Hillsborough County, FL
	Jason Gorrie	CDM
	Joe Kahn	FDEP
	Trina Vielhauer	FDEP
	Patricia Kolmer	FDEP
	Scott Sheplak	FDEP
	Mary Smallwood	Ruden & McClosky
	Brian Bahor	Covanta Energy