

Covanta Lake, Inc.
A Covanta Energy Company
3830 Rogers Industrial Park Road
Okahumpka, FL 34762
Tel 352 365 1611
Fax 352 365 6359

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ENERGY
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BUREAU OF AIR REGULATION

November 4, 2005

Mr. Bruce Mitchell
FDEP, Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Covanta Lake, Inc.
Lake County Resource Recovery Facility - ID No. 069-0046
Request for Name Change

Dear Mr. Mitchell:

Thank you for the Department letter dated October 31, 2005, regarding additional information on our request for facility name change from "Covanta Lake, Inc." to "Covanta Lake II, Inc." It appears that the additional information was determined based on the requirements for a Transfer of Air Permits.

Covanta Lake wishes to clarify that it is NOT requesting for a Transfer of Air Permits - the submitted documents was a request for a name change. In the absent of a form for name change, Covanta Lake altered the heading on page 2 of the Application for Transfer of Air Permit. Specifically, in the heading for the section Notification of New Ownership, the words "or New Company Name" was added. If this approach is not acceptable, please provide guidance on the subject.

On the issue of Responsible Official (RO), attached please find a copy of the document submitted to the Department on February 28, 2003 which designated me as an additional RO. Also attached is a copy of my Chief Facility Operator license issued by ASME.

As far as the Statement of Compliance, we believe that it is due March 1st, 2006 for the calendar year 2005 because there has not been a "transfer" of the Title V Air Permit.

If you have any questions, or require further information, please contact me at (727) 919-7671.

Sincerely,



Gary Main
Facility Manager

C: L. Brasowski
N. Tammi
V. Ta
T. Staniec