

Florida Department of
Environmental Protection

Memorandum

TO: Joseph Kahn, Division of Air Resource Management
THROUGH: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jeff Koerner, New Source Review Section
FROM: Bruce Mitchell, New Source Review Section
DATE: November 30, 2009
SUBJECT: Final Air Construction Permit Modification No. 0690046-008-AC (PSD-FL-113H)
Covanta Lake II, Inc., Lake County Resource Recovery Facility
Changes in the Method of Operation to Allow the Processing of Regulated Garbage
Municipal Solid Waste Combustors Units 1 and 2

The final air construction permit for this project is attached for your approval and signature. The project requires a minor air construction permit to authorize the processing of regulated garbage from international and interstate movements. No physical change is required to process the "regulated garbage". This new waste stream is essentially identical to the typical waste stream of domestic flights and charter boat cruises, except for the place of origin, and mostly consists of paper products and food wastes and their packaging materials. Even so, the proposed change is considered to be a change in the method of operation. Since there is no change in the throughput rate or composition of MSW processed, then there are no projected changes in actual pollutant emissions. Therefore, the project does not trigger PSD preconstruction review. The proposed work will be performed at the existing Lake County Resource Recovery Facility located at 3830 Rogers Industrial Park Road in Okahumpka, Lake County, Florida. The project is not considered a new source review reform project.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

JK/tlv/jfk/rbm

FINAL DETERMINATION

PERMITTEE

Covanta Lake II, Inc
3830 Rogers Industrial Park Road
Okahumpka, Florida 34762

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Air Permitting North Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0690046-008-AC
Lake County Resource Recovery Facility
Municipal Solid Waste Combustors Units 1 and 2 Modification

The project required a minor air construction permit to authorize the processing of regulated garbage from international or interstate movements. The project will not change the throughput capacity of the municipal solid waste combustors Units 1 and 2. The proposed work will be performed at the existing facility.

NOTICE AND PUBLICATION

The Department distributed an initial Intent to Issue Permit package on November 6, 2009. The applicant published the Public Notice of Intent to Issue in the Orlando Sentinel on November 11, 2009. The Department received the proof of publication on November 18, 2009. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Central District office, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the permit as noticed.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

Covanta Lake II, Inc
3830 Rogers Industrial Park Road
Okahumpka, Florida 34762

Authorized Representative:
Mr. Gary Main, Facility Manager

Air Permit No. 0690046-008-AC
PSD-FL-113H
Air Construction Permit Revision
Lake County Resource Recovery Facility
Facility ID No. 0690046
MSWC Units 1 and 2
International or Interstate Solid Waste Project

PROJECT

This is the final air construction permit revision, which modifies Permit No. PSD-FL-113 (as amended) for the existing municipal solid waste combustors Units 1 and 2 to authorize the processing of regulated garbage from international or interstate movements. The Lake County Resource Recovery Facility is a municipal solid waste processing facility categorized under Standard Industrial Classification No. 4953. The existing facility is located at 3830 Rogers Industrial Road, Lake County, Florida. The UTM coordinates are Zone 17; 413.12 kilometers (km) East; and 3179.21 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revision).

STATEMENT OF BASIS

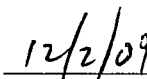
This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Joseph Kahn, Director
Division of Air Resource Management



12/2/09
(Date)

PERMIT REVISION

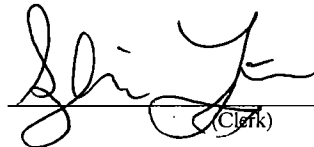
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 12/3/09 to the persons listed below.

- Mr. Gary Main, Covanta Lake II, Inc.: (gmain@covantaenergy.com)
- Mr. Viet Ta, Covanta Lake II, Inc.: (vta@covantaenergy.com)
- Mr. Jason Gorrie, P.E., Covanta Energy: (jgorrie@covantaenergy.com)
- Ms. Caroline Shine, DEP Central District Office: (caroline.shine@dep.state.fl.us)
- Ms. Heather Abrams, U.S. EPA Region 4: (abrams.heather@epa.gov)
- Ms. Katy Forney, U.S. EPA Region 4: (forney.kathleen@epa.gov)
- Ms. Ana Oquendo, U.S. EPA Region 4: (oquendo.ana@epa.gov)
- Ms. Barbara Friday, DEP BAR: (barbara.friday@dep.state.fl.us)
- Ms. Vickie Gibson, DEP BAR Reading File: (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILED AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

12/3/09
(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Covanta Lake II, Inc. operates the existing Lake County Resource Recovery Facility, which is a municipal solid waste processing facility. This facility consists of two identical mass-burn municipal solid waste combustors (MSWC) Units 1 and 2, with auxiliary burners, lime storage and processing facilities, an activated carbon storage silo (EU-003), ash storage and processing facilities, a metals recovery system, cooling towers and ancillary support equipment.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 of the Code of Federal Regulations Part 60 (40 CFR 60).

PROPOSED PROJECT

This project revises Specific Condition 1.e., which first appeared in 0690046-003-AC/PSD-FL-113E, regarding the methods of operation for fuels for MSWC Units 1 and 2. Specifically, the change is to authorize the handling and processing of regulated garbage from international or interstate movements.

SECTION 2. PERMIT REVISION

The following permit condition revision is added as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

Permit Being Modified: Permit No. 0690046-003-AC/PSD-FL-113E

Affected Emissions Units: EU-001 and EU-002

Section III. Subsection A. Specific Condition 1.e.: This specific condition is revised as follows.

Methods of Operation - Fuels.

(9) Regulated Garbage from International or Interstate Movements. The facility is authorized to process international or interstate regulated garbage, which means garbage that originates from outside the continental United States or Canada and is regulated by the Department of Homeland Security, Customs and Border Protection under the authority of the Animal and Plant Health Inspection Service. Processing of the regulated garbage shall be in accordance with the Compliance Agreement and Addendums signed on June 16, 2009, with the United States Department of Agriculture, Animal and Plant Health Inspection Service, Plant Protection and Quarantine. Regulated garbage means garbage that was on board, generated on board or removed from any means of conveyance during international or interstate movements, and includes food scraps, table refuse, galley refuse, food wrappers or packaging materials and other waste material from stores, food preparation areas, passengers' or crews' quarters, dining rooms or any other areas on means of conveyance, and meals and foods that were available for consumption by passengers or crew on an aircraft but were not consumed. Garbage that is commingled with regulated garbage becomes regulated garbage. The term "interstate" includes Hawaii, Alaska and the U.S. territories. The term "movement" includes all potential transportation types, such as the airlines, cruise lines, trucks, etc. [9 CFR 94.5; 7 CFR 330.400; Compliance Agreement with Addendums signed June 16, 2009; and 0690046-008-AC/PSD-FL-113H]

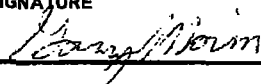

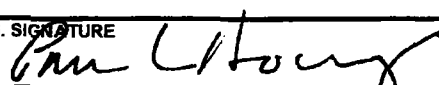
{Other paragraphs within this Specific Condition are unchanged.}

[Rules 62-4.160(2), 62-210.200 and 62-213.440(1), F.A.C.; AC35-115379/PSD-FL-113(C); ~~and~~, 0690046-003-AC/PSD-FL-113(E); and 0690046-008-AC/PSD-FL-113H]

COMPLIANCE AGREEMENT WITH USDA

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for this information collection are 0579-0054, 0088, 0129, 0198, 0238, 0257, 0306, 0310. The time required to complete this information collection is estimated to average 1.25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM APPROVED
OMB NUMBER 0579-0054/0068/0129/0198/0238/0257/0306/0310

UNITED STATES DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE PLANT PROTECTION AND QUARANTINE		COMPLIANCE AGREEMENT			
1. NAME AND MAILING ADDRESS OF PERSON OR FIRM Covanta Lake II, Inc. 383J Rogers Industrial Park Road Okahumpka, FL 34762 Phone: 352-365-1611		2. LOCATION SAME Contact: Mr. Gary Main, Facility Manager Phone: 352-365-1611			
3. REGULATED ARTICLE(S) Regulated garbage					
4. APPLICABLE FEDERAL QUARANTINE(S) OR REGULATIONS 7 CFR 330.440 and 9 CFR 94.5					
5. I/WE AGREE TO THE FOLLOWING: See attached Compliance Agreement (5 pages), Addendum to Compliance Agreement (Cleaning and Disinfection), and Addendum to Compliance Agreement (Process and Training).					
6. SIGNATURE 		7. TITLE Facility Manager	8. DATE SIGNED 6/16/09		
The affixing of the signatures below will validate this agreement which shall remain in effect until cancelled, but may be revised as necessary or revoked for noncompliance.		9. AGREEMENT NO. LAKE-01	10. DATE OF AGREEMENT 17 June 2009		
		11. PPQ/CBP OFFICIAL (NAME AND TITLE) Dr. Kathleen M. Kral, AQI Veterinary Medical Officer		12. ADDRESS USDA-APHIS-PPQ 9951 Atlantic Boulevard, Suite 177 Jacksonville, FL 32225 Phone: 904-725-2960	
13. SIGNATURE 		14. U.S. GOVERNMENT/STATE AGENCY OFFICIAL (NAME AND TITLE) Mr. Paul Hornby, State Plant Health Director		15. ADDRESS USDA-APHIS-PPQ 8100 N.W. 15th Place Gainesville, FL 32606 Phone: 352-313-3040	
16. SIGNATURE 					

**Compliance Agreement for
Covanta Lake II, Inc.
June 2009**

This Compliance Agreement may be immediately canceled or revoked for noncompliance. This Compliance Agreement is non-transferable.

Any person who knowingly violates the Plant Protection Act (PPA) (7 U.S.C. §§ 7701 et. seq.) and/or the Animal Health Protection Act (AHPA) (7 U.S.C. §§ 8301 et. seq.) may be criminally prosecuted and found guilty of a misdemeanor which can result in penalties, a one-year prison term, or both. Additionally, any person violating the PPA and/or the AHPA may be assessed civil penalties of up to \$250,000 per violation or twice the gross gain or gross loss for any violation that results in the person deriving pecuniary gain or causing pecuniary loss to another, whichever is greater.

The establishment under this Compliance Agreement shall immediately notify the local APHIS office at **407-725-2960** of any management changes which may void this Compliance Agreement.

By signing this agreement, the signer certifies that his/her facility has met or will meet the requirements of all applicable environmental authorities prior to handling garbage regulated by the Department of Homeland Security, Customs and Border Protection under the authority of the Animal and Plant Health Inspection Service.

The company, its employees and subcontractors, and procedures covered by this compliance agreement are subject to unannounced inspections by CBP or APHIS personnel.

All records required by this agreement must be made available to CBP/APHIS officials upon request.

Any plastic bags used in the transportation or storage of regulated garbage must be at least four (4) Mil (0.004 inch) thick.

Compliance Agreements are valid for one (1) year from the date of signature, and must be renewed yearly.

1. Definitions

- A. **Regulated garbage** — As defined under 7 CFR 330.400 and 9 CFR 94.5, garbage includes all waste material derived in whole or in part from fruits, vegetables, meats, or other plant or animal (including poultry) material, and other refuse of any character whatsoever that has been associated with any material. For the purpose of this compliance agreement, "regulated garbage" is garbage that was on, generated on board, or removed from any means of conveyance during international or interstate movements, and includes food scraps, table refuse, galley refuse, food wrappers or packaging materials and other waste material from stores, food preparation areas, passengers' or crews' quarters, dining rooms or any other areas on means of conveyance. Regulated garbage also means meals and other foods that were available for consumption by passengers or crew on an aircraft but were not consumed. Garbage that is

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commingled with regulated garbage becomes regulated garbage. For the purpose of this document regulated garbage will be known hereafter as garbage.

- B. **Trash** — Refuse that neither contains nor is visually contaminated with food waste. Trash is **unrestricted**. For example, trash that solely contains empty beverage cans would be unrestricted. Newspapers and magazines in the passenger cabin would also be unrestricted. An empty cardboard milk carton, sandwich, or fruit found in the passenger cabin, however, would be considered as garbage as opposed to trash and would be restricted.
- C. **DHS, USCBP** — Department of Homeland Security, United States Customs and Border Protection, known hereafter as CBP.
- D. **USDA, APHIS, PPQ** — United States Department of Agriculture, Animal and Plant Health Inspection Service, which provides oversight for agricultural issues, known hereafter as APHIS. Veterinary Regulatory Support (VRS) is the section of PPQ charged with oversight of regulated garbage.

2. Regulated Garbage Handling Procedures

A. Regulated garbage is processed by: *(check appropriate box)*

- Incinerator located at:

Covanta Lake II, Inc., 3830 Rogers Industrial Park Road, Okahumpka, FL
34762
Phone: 352-365-1611

B. Status of Garbage:

- Regulated garbage will be separated from domestic garbage by:

1) Location: Bay 1

2) Containers: 4-Mil bags from roll-off container

C. The establishment must use rigid leak-proof containers with tightly-fitting covers if not separating garbage by location. The containers shall be lettered with the words "REGULATED GARBAGE" or a similar acceptable phrase in English and any appropriate foreign language. Lettering shall be at least two (2) inches high on indoor containers and at least four (4) inches high on outdoor containers. Containers used for regulated garbage shall **not** be used for domestic garbage, nor shall containers used for domestic garbage be used for regulated garbage.

The container to be used for a purpose **other than** hauling foreign garbage must have markings obliterated and must be disinfected with APHIS-approved disinfectant under APHIS/CBP supervision prior to such use.

Scraped residue and runoff may be ground into an approved sewage system as defined in 7CFR 330.400 or 9CFR 94.5 or be collected and treated as regulated garbage. All materials associated or in contact with regulated garbage must be treated as regulated garbage.

- D. The plant premises and the area around the incinerator shall be kept clean and free of loose garbage at all times. Dumpster leakage and garbage spills in Bay 1 shall be contained in a manner acceptable to CBP/APHIS as indicated here:

Covanta will follow the cleaning and disinfecting procedures outlined in the **Addendum to Compliance Agreement**.

- E. The company is responsible for all regulated garbage including food waste, loose trays of food, and unused meals, and will **not** allow its unauthorized diversion, removal, use, or consumption.

F. Spills and Routine Disinfection

APHIS will be notified of any spillage outside of the facility at **407-725-2960**. Cleaning and disinfecting will be accomplished immediately. APHIS-approved disinfectant must be kept at the processing facility for garbage spills and routine surface disinfections including areas around the sterilizers, incinerators dumpsters and compactors and must be used after thorough pickup and cleaning. The company must provide trained personnel and equipment for immediate clean up (see Addendum to Compliance Agreement).

A log or record book containing information on the amounts and concentrations of disinfectants used will be kept in order to fulfill EPA reporting requirements.

Reporting requirements include:

- i. The number of disinfection treatments performed (including by designation – routine surface disinfections and cleaning of spills);
- ii. If applicable, the number of pounds of sodium carbonate used (with or without sodium silicate);
- iii. If applicable, the concentration of bleach (stated as a percentage) and the number of gallons of each concentration of bleach used;
- iv. Location of spills.

The record or log book must be kept indefinitely. Information on the amounts and concentrations of disinfectants used during a specified reporting period must be provided to CBP/APHIS upon request.

APHIS-approved disinfectant is **not** to be used in enclosed food handling areas. Only EPA-approved sanitizers should be used in food handling areas. Records of these instances will also be maintained.

3. Equipment - Incinerator

- A. The incinerator must reduce burned materials to an ash. Glass and metal shall be the only residue in the ash. The establishment will maintain records which will include the name of the approved cartage firm, date, time, number of units (bags,

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bins, containers) and quantity of garbage (weight) incinerated. The records must be retained for a minimum of one (1) year from the end of the month in which the incineration occurred.

- B. The equipment shall be properly maintained to ensure that each load of regulated garbage is incinerated to ash. If the incinerator malfunctions, then immediately report the malfunction to the local APHIS office at **407-725-2960**.
- C. The incinerator must be observed after major repairs or malfunction to ensure that regulated garbage is properly incinerated to ash.
- D. In order to store regulated garbage, the following conditions must be met:
 - i. Material to be stored must be adequately containerized and marked (per Section 2. B.). Location of storage facility if not in the same building/area as the processing equipment:

Regulated garbage will be processed immediately on receipt.

- ii. Storage of regulated garbage in plastic bags must be inside a closed building; if outside storage, garbage must be in sealed, plastic bags in a rigid leak-proof container with a tight-fitting lid. The container, room, or other confined area where the regulated material is to be stored must be leak-proof and capable of being locked. The material must be inaccessible to birds, rodents, and other vermin. Storage of regulated garbage must not exceed 48 hours without prior approval from PPQ VRS or its designee.
 - iii. The processing firm must maintain logs or records of regulated garbage that is stored. This information must be kept for one (1) year from the end of the month the storage was initiated.
- E. The company must conspicuously post regulated garbage-handling procedures in the work area. The procedures must be in English and other appropriate languages.

4. Backup System

In the event the primary garbage disposal system is inoperable, the local APHIS office will be notified immediately at **407-725-2960** and will be advised, in advance, as to the use of the following prearranged approved backup system: *(check one)*

- Incinerator located at:

Stericycle Inc., 254 W. Keene Road, Apopka, FL 32773
Phone: 407-889-2800, ext. 3257

5. Training

- A. The company shall present a training program to employees before they are permitted to handle or supervise the handling of regulated garbage. This training program should be of sufficient duration to adequately provide the required

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information. All previously trained employees shall be provided review training annually (this training may be given in more than one session).

- B. The training package must be approved by the local APHIS/CBP Port Director or his/her designee, and may include both formal classroom training and on-the-job training, as follows:
- i. Definition of regulated garbage;
 - ii. Explanation and purpose of the regulations;
 - iii. Inclusion of film, slides, or other training aids on foreign animal and plant diseases and pests;
 - iv. Specific outline — by demonstration, illustration, or picture — of proper regulated garbage handling procedures for the facility and step-by-step procedures from stripping of aircraft to disposal. A written, step-by-step protocol for reporting and handling emergency spills, maintaining control of regulated materials, and the cleaning and disinfecting of affected areas and equipment must be available for CBP/APHIS review;
 - v. This compliance agreement;
 - vi. Presentation in English and other appropriate languages.
- C. The records must be retained for a minimum of one (1) year from the end of the month in which the training occurred.

Addendum to Compliance Agreement

Cleaning and Disinfection

1. Articles Requiring Cleaning and Disinfection

Any article, means of conveyance, or other surface contaminated with animal origin material or spillage from USDA regulated garbage must be cleaned and disinfected with one of the USDA APHIS-approved disinfectants listed below.

Contaminated carts, pallets, machinery, handling containers, trucks, or railroad cars used for transporting USDA regulated garbage and any dock or warehouse surfaces contaminated with leakage from such garbage must be cleaned and disinfected before the items are reused. Cleaning of portable items shall be accomplished over a drain leading to an approved sewage system.

2. Materials and Equipment

When a spill occurs, the following items must be immediately available to workers tasked with cleaning up the spill:

- A. APHIS-approved disinfectant
 - i. Virkon® S (either in bulk or pre-measured for mixing or a premixed solution for immediate use); or
 - ii. Household bleach (sodium hypochlorite) in either full strength for mixing or premixed for immediate use
- B. A gallon container filled with clean water
- C. A detergent solution (facility choice)
- D. Spray bottle to apply disinfectant
- E. Whisk broom and dust pan or shovel
- F. Paper towels or other absorbent material
- G. Plastic leak-proof bags to hold collected material

It is suggested that a disinfection kit, incorporating the above required items as well as the equipment listed below, be available at the work site, and if applicable, on each conveyance transporting regulated garbage. This allows for immediate cleaning and disinfection of any spillage of regulated garbage.

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The additional items recommended for inclusion in the disinfection kit are:

- H. A scrub brush and scraping tool
- I. Disposable plastic shoe covers
- J. A box for holding the equipment which can be labeled "Disinfection Kit" (it is recommended that the disinfection procedures are affixed to the inside of the box)
- K. Appropriate personal protective equipment such as rubber or latex gloves and safety goggles and/or other equipment as required by the facility
- L. Copy of all applicable Material Safety Data Sheets

Disinfectant Information

1. Virkon® S is available through many Internet sources. Follow the directions on the label. Premixed Virkon® S is effective for seven (7) days from the date of mixing. Write the date the solution was mixed on the container holding the solution.
2. Household bleach (chemical name: sodium hypochlorite). Off-the-shelf bleach is 5.25% or 6% sodium hypochlorite.

The minimum effective dilution for a garbage spill is 3% sodium hypochlorite.

Directions for use:

- With 5.25% sodium hypochlorite, mix the solution of 1.5 cups of bleach to 1 cup of water to make a 3% solution.
- When larger quantities are needed, mix at a ratio of 3 parts bleach to 2 parts water, such as 3 gallons of bleach to 2 gallons of water to make a 3% solution.
- With 6% sodium hypochlorite, mix at a ratio of 1 part bleach to 1 part water, such as 1 cup of bleach with 1 cup of water or 1 gallon of bleach to 1 gallon of water to make a 3% solution.

A premixed solution of bleach and water is only effective for a 24-hour period post mixing. A date and time should be applied to the bulk container holding the solution.

Disinfectant Procedures

1. Sweep up or scrape off as much of the contaminant as possible. Apply absorbent material if needed. Place the sweepings, scrapings, and absorbent material in a leak-proof plastic bag for incineration or sterilization. Free surfaces of grease or dirt when applicable.

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2. Scrub the contaminated area or areas where the spill occurred. Use a good detergent solution of the facility's choice. **Note:** if the area is not effectively scrubbed first, remaining debris will protect viruses embedded below the surface, where they will remain untouched by the disinfectant.
3. Flush the scrubbed surfaces with clean water. Flushing is important because the detergent may react with the disinfectant and reduce the disinfectant's activity.
4. If using a premixed solution of disinfectant, then agitate the solution thoroughly. If the temperature is below freezing, delay the application of the disinfectant until the temperature is above freezing. Apply the disinfectant generously, covering the entire area.
5. Incinerate or sterilize all refuse, sweepings, and scrapings that are in the plastic bag.

WARNING: Do not use sodium carbonate, sodium silicate, or Virkon® S around food, in areas where food is handled, prepared, or transported such as inside a catering kitchen, galley areas aboard aircraft, or in trucks used to transport food and supplies to an aircraft. When disinfecting in these areas, allow the use of a sanitizer/disinfectant approved by the Environmental Protection Agency (EPA) for use around food or on food contact surfaces.

Do not use sodium hypochlorite (household bleach) on passenger areas or cargo areas of aircraft as it can corrode sensitive aircraft or electronic parts. Virkon® S should not be used in passenger areas, to include galley or food preparation areas, as it is not approved by the Environmental Protection Agency (EPA) for use around food or on food contact surfaces. Virkon® S may damage carpets or seat covers in passenger areas of aircraft.

*Detergents may be used inside aircraft, in accordance with the manufacturer's specifications and Department of Defense or Department of Transportation regulations, as applicable, to mitigate the threat of animal diseases. According to U.S. Air Force regulations, citrus-based cleaners may be used in non-food passenger areas.

Contact APHIS at 407-725-2960 when a spill occurs inside an aircraft.

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Company Representative Initials LSM

**Addendum to Compliance Agreement for
Covanta Lake II, Inc.
June 2009**

Process:

- i. The regulated garbage will be weighed and the load will receive a ticket at Covanta's weigh station; the hauler will notify the Control Room that the garbage has arrived. The hauler will deliver the garbage in a roll-off container to Bay 1. The garbage, in 4-MIL bags, will be dumped into the concrete pit, collected by the claw, and placed into one of the two hoppers for delivery to the boilers and incineration. The claw operator will monitor the placement of the garbage into the hopper; any regulated garbage that has fallen from the claw will also be picked up and placed in one of the hoppers.
- ii. The Control Room supervisor will notify the staff that regulated garbage has begun the incineration process. Since the burn process takes approximately 90 minutes, workers will monitor the ash pile for a period of 60 to 120 minutes after the process has begun, to ensure that all the regulated garbage has burned to ash.
- iii. If any regulated garbage has not been reduced to ash, it will be collected and re-incinerated. The time and temperature of the process will be adjusted to ensure that the garbage will be burned to ash.

Training:

Covanta will use USDA's CD/DVD "No Free Ride" to meet the training requirements.

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Company Representative Initials *[Signature]*

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, December 03, 2009 4:19 PM
To: 'gmain@covantaenergy.com'
Cc: 'vta@covantaenergy.com'; 'jgorrie@covantaenergy.com'; Shine, Caroline; 'abrams.heather@epa.gov'; 'forney.kathleen@epa.gov'; 'oquendo.ana@epa.gov'; Friday, Barbara; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Covanta Lake II, Inc. - Lake County Resource Recovery Facility; 0690046-008-AC/ PSD-FL-113H
Attachments: 0690046-008-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0690046.008.AC.F_pdf.zip

Owner/Company Name: COVANTA LAKE II, INC.
Facility Name: LAKE COUNTY RESOURCE RECOVERY FACILITY
Project Number: 0690046-008-AC/ PSD-FL-113H
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: LAKE
Processor: Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Ta,Viet [VTa@CovantaEnergy.com]
Sent: Wednesday, December 09, 2009 11:41 AM
To: Livingston, Sylvia
Subject: RE: Covanta Lake II, Inc. - Lake County Resource Recovery Facility; 0690046-008-AC/ PSD-FL-113H

Hi Sylvia,
I can view the project documents. Thank you.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, December 03, 2009 4:19 PM
To: Main,Gary
Cc: Ta,Viet; Gorrie,Jason; Shine, Caroline; abrams.heather@epa.gov; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Covanta Lake II, Inc. - Lake County Resource Recovery Facility; 0690046-008-AC/ PSD-FL-113H

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Livingston, Sylvia

From: Ta,Viet [VTa@CovantaEnergy.com]
Sent: Wednesday, December 16, 2009 11:29 AM
To: Livingston, Sylvia
Cc: Main,Gary
Subject: RE: Covanta Lake II, Inc. - Lake County Resource Recovery Facility; 0690046-008-AC/ PSD-FL-113H

Yes I can acknowledge receipt of the document for Covanta Lake II.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, December 16, 2009 11:25 AM
To: Ta,Viet
Subject: RE: Covanta Lake II, Inc. - Lake County Resource Recovery Facility; 0690046-008-AC/ PSD-FL-113H

Viet Ta,

I have not received a confirmation from Mr. Gary Main and wonder if you were accepting receipt of this document for your company. If so please, include his e-mail address in your response to me.

Thank you.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

From: Ta,Viet [mailto:VTa@CovantaEnergy.com]
Sent: Wednesday, December 09, 2009 11:41 AM
To: Livingston, Sylvia
Subject: RE: Covanta Lake II, Inc. - Lake County Resource Recovery Facility; 0690046-008-AC/ PSD-FL-113H

Hi Sylvia,
I can view the project documents. Thank you.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, December 03, 2009 4:19 PM
To: Main,Gary
Cc: Ta,Viet; Gorrie,Jason; Shine, Caroline; abrams.heather@epa.gov; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
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Facility Name: LAKE COUNTY RESOURCE RECOVERY FACILITY

Project Number: 0690046-008-AC/ PSD-FL-113H

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: LAKE

Processor: Bruce Mitchell

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Sylvia Livingston
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Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

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.