



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 26, 2011

Sent via Electronic Mail - Read Receipt Requested
gmain@covantaenergy.com

Mr. Gary Main, Facility Manager
Covanta Lake II, Inc.
3830 Rogers Industrial Park Road
Okahumpka, Florida 34762

Re: **Request for Additional Information**
Permit No. 0690046-011-AC
Lake County Resource Recovery Facility
Minor Air Construction Permit
Leachate Injection Project

Dear Mr. Main:

On July 29, 2011, Covanta Lake II submitted an application for an air construction permit for the existing Lake County Resource Recovery Facility proposing to inject leachate generated at the Astatula landfill (approximately nine miles east northeast of the Lake County facility) directly into the two municipal solid waste (MSW) combustors (EU001 and EU002). Leachate is the liquid product formed by water (precipitation and dissolved materials) that has come into contact with MSW. It percolates through the landfill and leaches out material, some of which can have air permitting implications if the leachate is combusted.

The application is incomplete. In order to continue processing the application, the Department needs the additional information requested below. Should a response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

Questions:

1. What is the typical or expected sulfur content of the landfill leachate, and is it of sufficient quantity to impact MSW acid gas emissions, considering the additional chloride (Cl) that will also be added via leachate injection?
2. What is the temperature in the selective non-catalytic reduction (SNCR) zone where the landfill leachate will be injected? What will be the impact on dioxin/furan formation potential from injecting the Cl and organic matter into this temperature zone versus injecting it into the MSW combustion zone?
3. Are the landfill leachate storage tanks going to be new tanks? Will these new tanks be subject to any federal or state rules?
4. Will the total dissolved solids in the landfill leachate yield particulate matter (PM), PM₁₀ or PM_{2.5} emissions when combusted?
5. Please provide any results from testing at other resource recovery facilities where liquid has been injected into the SNCR in a manner consistent with the proposed project. Include if possible any observed effect on emissions resulting from combustion of the liquid or from the liquid's impact on the operation of the combustors or control devices.

REQUEST FOR ADDITIONAL INFORMATION

6. If the Department's permit included a trial period for leachate injection, what meaningful emissions or operating parameters could be measured in a cost-effective manner to demonstrate that the projected emissions increase from combusting the leachate is less than the significant emission rates for the prevention of significant deterioration rules? How long should the trial period last to allow for initiating leachate injection, stabilizing operation, measuring impacts and reporting results?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a construction permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. Rule 62-4.055(1), F.A.C., also requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you should have any questions, feel free to contact Yousry (Joe) Attalla, by telephone at (850) 717-9078 or by e-mail at yousry.attalla@dep.state.fl.us.

Sincerely,



Gregory P. DeAngelo, P.E.
Office of Permitting & Compliance
Administrator, Chemicals & Combustion Key Industry Group
(850) 717-9024

GPD/yha

This letter was sent to the following people by electronic mail with received receipt requested.

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
Mr. Brad James, P.E., Trinity Consultants: bjames@trinityconsultants.com
Ms. Caroline Shine, DEP Central District Office: caroline.shine@dep.state.fl.us
Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov
Ms. Ana Oquendo, U.S. EPA Region 4: oquendo.ana@epa.gov
Ms. Lynn Scarce, DEP OPC: lynn.scarce@dep.state.fl.us (for reading file)

From: Searce, Lynn
To: "gmain@covantaenergy.com"; Shine, Caroline
Cc: "vta@covantaenergy.com"; "igorrie@covantaenergy.com"; "bjames@trinityconsultants.com"; "Shine, Caroline"; "forney.kathleen@epa.gov"; "oguendo.ana@epa.gov"; Attalla, Yousry; DeAngelo, Gregory; "lynn.searce@dep.state.fl.us"; Friday, Barbara
Subject: 0690046-011-AC, Lake County Resource Recovery Facility, Request for Additional Information
Date: Friday, August 26, 2011 1:32:00 PM
Attachments: 0690046-011-AC, Lake County Request for Additional Information 8-26-11.pdf

Dear Mr. Main:

Attached is a **Request for Additional Information** for the project referenced above. The Permit project document addressed in this email may require immediate action within a specified time frame. Please open and review the document as soon as possible, and verify that it is 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 document or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

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

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>> .

Regards,
Lynn Searce
Office of Permitting and Compliance (OPC)
Division of Air Resources Management
850-717-9025

Scearce, Lynn

From: Brad James [bjames@trinityconsultants.com]
Sent: Friday, August 26, 2011 2:03 PM
To: Scearce, Lynn
Subject: 0690046-011-AC, Lake County Resource Recovery Facility, Request for Additional Information

Return Receipt

Your 0690046-011-AC, Lake County Resource Recovery Facility, Request for document: Additional Information

was received bjames@trinityconsultants.com
by:

at: 08/26/2011 02:03:04 PM EDT

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you Received this in error, please contact the sender and delete the material from any computer.

Scearce, Lynn

From: Gorrie, Jason [jgorrie@CovantaEnergy.com]
To: Scearce, Lynn
Sent: Friday, August 26, 2011 1:42 PM
Subject: Read: 0690046-011-AC, Lake County Resource Recovery Facility, Request for Additional Information

Your message was read on Friday, August 26, 2011 1:41:34 PM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Microsoft Exchange
To: bjames@trinityconsultants.com
Sent: Friday, August 26, 2011 1:33 PM
Subject: Relayed: 0690046-011-AC, Lake County Resource Recovery Facility, Request for Additional Information

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

bjames@trinityconsultants.com

Subject: 0690046-011-AC, Lake County Resource Recovery Facility, Request for Additional Information

Sent by Microsoft Exchange Server 2007