

Best Available Copy

COMMENTS OF COVANTA LAKE, INC.

On Draft Air Construction Permit/PSD Amendment No.s  
0690046-003-AC/PSD-FL-113(E) and;  
Initial Title V Air Operation Permit  
Revised DRAFT Title V Operations Permit No.:  
0690046-001-AV

**Brian Bahor, QEP**  
Vice President - Environmental Permitting



**Covanta Projects, Inc.**  
A Covanta Energy Company  
40 Lane Road  
Fairfield, NJ 07004  
Tel 973 882 7236  
Fax 973 882 4167  
Email bbahor@covantaenergy.com

August 24, 2001

RECEIVED

AUG 27 2001

BUREAU OF AIR REGULATION

Mr. Bruce Mitchell  
Title V Section  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Reference: Covanta Lake, Inc. - Lake County Resource Recovery Facility  
Draft Air Construction Permit/PSD Amendment No.s 0690046-003-  
AC/PSD-FL-113(E)  
Initial Title V Air Operation Permit and Revised DRAFT Title V  
Operation Permit No.: 0690046-001-AV

Dear Mr. Mitchell:

Covanta Lake, Inc. is please to provide comments on the Draft Air Construction Permit and Revised Draft Title V Operation Permit for the Lake County Resource Recovery Facility. The attached document is being submitted in a timely manner. If you have any questions or comments on this submittal, please do not hesitate to contact me direct at 973-882-7236.

Thank you for your assistance in this matter.

Brian Bahor  
Vice President, Environmental Permitting  
Covanta Waste to Energy, Inc.

Distribution

Cecil Boatwright (Lake)      Viet Ta (Pasco)      Joe Treshler (Pasco)      File



**COMMENTS OF COVANTA LAKE, INC.**

**On Draft Air Construction Permit/PSD Amendment No.s 0690046-003-  
AC/PSD-FL-113(E) and;  
Initial Title V Air Operation Permit  
Revised DRAFT Title V Operation Permit No.: 0690046-001-AV**

**Table of Contents**

**Part 1           Comments On Draft Air Construction Permit/PSD Amendment No.s  
0690046-003-AC/PSD-FL-113(E)**

**Part 2           Comments on the Initial Title V Air Operation Permit, Revised  
DRAFT Title V Operation Permit No.: 0690046-001-AV**

**Appendices**

**A               Recyclable 100, Inc. Permit Correspondence**

**B               Recyclable 100, Inc. Conveyor Information and Drawing**

**COMMENTS OF COVANTA LAKE, INC.**  
**On Draft Air Construction Permit/PSD Amendment No.s 0690046-003-AC/PSD-FL-113(E) and;**  
**Initial Title V Air Operation Permit**  
**Revised DRAFT Title V Operation Permit No.: 0690046-001-AV**

The comments provided herein are organized into two parts. Part 1 is for the referenced Draft Air Construction Permit/PSD Amendment and Part 2 is for the associated Initial Title V Air Operation Permit. This approach is consistent with the issuance by the Department of a combined set of documents and the public notice issued for both documents. The PSD amendment comments are presented first since they are a subset of the Title V comments and they are the foundation of the Title V conditions.

**Part 1 – Comments On Draft Air Construction Permit/PSD Amendment No.s 0690046-003-AC/PSD-FL-113(E)**

1. Comment/Request 2.b

The Facility proposes that the following terms should be removed from the first sentence of (2) Auxiliary Burners – “until design furnace gas temperature is achieved”. This change would make Condition 2.b consistent with Condition 2.a. ok

2. Comment/Request 2.b

The Facility proposes that Item (3)(a)(3) lead acid batteries and Item (3)(a)(10) beryllium-containing waste should be removed from Condition (3)(a) and added to Condition (3)(b). The Facility does not solicit lead-acid batteries or beryllium-containing waste for disposal and has signage to inform all transporters that lead-acid batteries are not to be delivered to the facility. The proposed change will not have an effect on air emissions because the Facility will continue its current efforts to prevent delivery of lead-acid batteries and beryllium-containing waste. The Facility will modify signage to inform transporters that beryllium containing waste is not to be delivered to the Facility. ok

Beryllium-containing waste is not inherent to local waste. The EPA defines this waste as that generated by a foundry, extraction plant, ceramic plant or propellant plant. The low beryllium stack emissions that supported the Departments decision to remove the requirement for testing of beryllium emissions, also supports the fact that this type of waste is not inherent in the waste stream.

While the Facility does not solicit these types of waste and does not want these types of waste to be delivered, the Facility prefers to avoid a situation where the Facility is asked to provide evidence that something is not being delivered. The Facility can demonstrate that we are not knowingly accepting this material but we cannot prove that lead batteries or beryllium waste does not exist anywhere and anytime.

3. Comment/Request 2.b

The Facility proposes that Item (3)(a)(8) should be removed from Condition (3)(a) in its entirety in order for the Title V permit to be consistent with the terms of the June 15, 1995 Amendment of Air Construction Permit PSD-FL-113 that allows for the processing of nonhazardous waste contaminated with virgin or used oil. New Specific Condition 1.e.1 specifically authorizes the firing of non-hazardous solid waste contaminated with virgin or used oil products. The proposed change will not have an effect of air emissions because the Facility because it is consistent with existing operations as defined by the June 15, 1995 permit amendment.

*-NO -  
this refers to  
the use of used oil  
as a liquid, which  
cannot be furnished  
from off-site vendors*

4. Comment/Request 2.b

The Facility proposes that items (7)(b), (7)(f) and (7)(g) should be consolidated into one condition to accurately and completely summarize all of the terms in the June 15, 1995 Amendment of Air Construction Permit PSD-FL-113 that allows for the processing of on-site and off-site nonhazardous waste contaminated with virgin or used oil. Please note that these items by themselves do not equal the June 15, 1995 amendment and that other items identified in Comment/Request 13. and 17. must be added to fully represent the June 15, 1995 amendment. Consolidation of these terms will not have an effect on air emissions and would avoid potential confusion in reporting data to the Department. As an example, the June 15, 1995 permit limits the amount of nonhazardous waste contaminated with virgin or used oil to not exceed twenty (20) percent by weight of the total solid waste input however Condition (7) limits the oil-based waste to five (5) percent. The proposed change would require a re-labeling of conditions however the results would yield a permit condition that is consistent with the underlying June 15, 1995 permit amendment.

*OK  
after compliance survey  
and PCB sentence  
for clarity.*

5. Comment/Request 2.h

The condition includes two time weighted averages; 3-hours for the stack concentration and 1-hour for removal efficiency. One common time weighted average is required to translate stack concentration into a removal efficiency, therefore a 3-hour time weighted average is proposed for both conditions. The use of a common time-weighted average will not cause an increase in air emissions but it will provide a clear method of calculations that is consistent with subpart Cb of 40 CFR part 60.

*No - SIP regulations  
and direct quote of  
Rule 62-286.40(4)(c)  
2) FAC*

6. Comment/Request 13. and 17. Page 11 of 16.

The Facility proposes that the following terms should be removed from the first sentence of (2) Auxiliary Burners - "until design furnace gas temperature is achieved". This change would make Condition 2.b consistent with Condition 2.a.

*See requirement  
comment  
term above  
(A.1)*

7. Comment/Request 13. and 17. Page 11 of 16.

The Facility proposes that Item (3)(a)(3) lead acid batteries and Item (3)(a)(10) beryllium-containing waste should be removed from Condition (3)(a) and added to Condition (3)(b). The Facility does not solicit lead-acid batteries or beryllium-containing waste for disposal and has signage to inform all transporters that lead-acid batteries are not to be delivered to the facility. The proposed change will not have an effect on air emissions because the Facility will continue its current efforts to prevent delivery of lead-

*See no signage  
to comment 2, above  
(A.2)*

acid batteries and beryllium-containing waste. The Facility will modify signage to inform transporters that beryllium containing waste is not to be delivered to the Facility.

Beryllium-containing waste is not inherent to local waste. The EPA defines this waste as that generated by a foundry, extraction plant, ceramic plant or propellant plant. The low beryllium stack emissions that supported the Departments decision to remove the requirement for testing of beryllium emissions, also supports the fact that this type of waste is not inherent in the waste stream.

While the Facility does not solicit these types of waste and does not want these types of waste to be delivered, the Facility prefers to avoid a situation where the Facility is asked to provide evidence that something is not being delivered. The Facility can demonstrate that we are not knowingly accepting this material but we cannot prove that lead batteries or beryllium waste does not exist anywhere and anytime.

8. Comment/Request 13. and 17. Page 11 of 16.

The Facility proposes that Item (a)(8) should be removed from Condition (3)(a) in its entirety in order for the Title V permit to be consistent with the terms of the June 15, 1995 Amendment of Air Construction Permit PSD-FL-113 that allows for the processing of nonhazardous waste contaminated with virgin or used oil. New Specific Condition 1.e.1 specifically authorizes the firing of non-hazardous solid waste contaminated with virgin or used oil products. The proposed change will not have an effect of air emissions because the Facility because it is consistent with existing operations as defined by the June 15, 1995 permit amendment

- no - this condition allows the burning of the solid waste - includes delivery of any material from same outside boundary

9. Comment/Request 13. and 17. Page 12 of 16.

The Facility proposes that three changes are necessary in Article (a) of *SOLID WASTE FROM ON SITE OPERATIONS* to maintain consistency with regulatory citations throughout the permit. The first change is the reference to 40 CFR 279.10. The Facility proposes that the more appropriate citation is 40 CFR 279.11. The second change is the reference to Rule 62-730.181, F.A.C. The Facility proposes that the appropriate citation is 62-710.210. The third and final change is to the Allowable Concentration of Total Halogens. The Facility proposes that the 4000 ppm Allowable Concentration in 40 CFR 279 is the appropriate value instead of the 1000 ppm maximum value. The Facility therefore proposes that a value of 4000 ppm should be used along with the appropriate note citing that *“Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 279.10(b)(1). Such oil is subject to subpart H of Part 266 of this chapter rather than this part when burned for energy recovery unless the presumption of mixing can be successfully rebutted”*.

OK

10. Comment/Request 13. and 17. Page 12 of 16.

Condition (5)(c) presents specific test methods for constituents/properties. The Facility proposes that the Test Methods in Item (c) do not fully represent the correct test method or the full range of currently available test methods. The Facility proposes that the

condition should be amended by adding " or equivalent EPA approved methods" to the condition.

11. Comment/Request 14. Page 14 of 16.

The existing condition establishes that the duration of excess emissions shall not exceed three (3) hours in any 24 hour period. Other Title V permits including FINAL Permit No.:0570261-001-AV for Hillsborough County Resource Recovery Facility establish that an excess emission event shall be limited to three (3) hours for any one occurrence and do not include the stipulation of one per day. The Facility proposes that the existing condition should be modified to be consistent with the Hillsborough condition.

The EPA has proposed an amendment to the startup, shutdown and malfunction provisions in the NSPS and EG for large MWC's ( Federal Register: December 18, 2000, Volume 65, Number 243). The Facility is proposing that the Final Title V permit should include a permit note that recognizes this pending EPA amendment and that the amendment can be incorporated in to the Title V permit as a permit amendment.

no - see NOTE below the table

already exists -  
sig. and edited  
startup;  
no change

NO - when proposed  
and adopted - we will  
evaluate a  
request

**PART 2 – Comments on the Initial Title V Air Operation Permit, Revised DRAFT Title V Operation Permit No.: 0690046-001-AV**

1.0 Section II. Facility-wide Conditions

1.1 Condition 2. General Pollutant Emission Limiting Standards. Objectional Odor Prohibited.

The Facility proposes that Condition 2 should identify that the condition is not federally enforceable because odor limitations are not related to the purpose of the New Source Review Program.

*AC 355-264176*

1.2 Condition 6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions

The Facility proposes that Condition 6 should be modified to identify that the condition is not federally enforceable. Condition 7 of Title V Permit No. 0570261 for the Hillsborough County Resource Recovery Facility includes the exact same language except the title of the Condition includes the statement, Not Federally Enforceable.

*No -  
March 1972  
SIP*

2.0 Section III. Emission Units and Conditions. Subsection A.

2.1 Condition A.11 (1) Municipal Solid Waste

The Facility proposes that the term “ non-hazardous waste contaminated with oil” should be replaced with “nonhazardous waste contaminated with virgin or used oil” in order to keep the Title V language consistent with the June 15, 1995 Amendment of Air Construction Permit PSD-FL-113.

*Done in the  
AC/PSD  
action*

2.2 Condition A.11 (2) Auxiliary Fuels

The Facility proposes that the first sentence should be modified by removal of the terms “until design furnace gas temperature is achieved”. This modification would make Condition A.11 (2) consistent with the terms of the Specific Condition 1.c of the Draft Air Construction Permit/PSD Permit Amendment Nos.:0690046-003-AC/PSD-FL-113(E).

*Done in the  
AC/PSD  
action*

2.3 Condition A.11 (3) Unauthorized Fuel

The Facility proposes that Item (3)(a)(3) lead acid batteries and Item (3)(a)(10) beryllium-containing waste should be removed from Condition (3)(a) and added to Condition (3)(b). The Facility does not solicit lead-acid batteries or beryllium-containing waste for disposal and has signage to inform all transporters that lead-acid batteries are not to be delivered to the facility. The proposed change will not have an effect on air emissions because the Facility will continue its current efforts to prevent delivery of lead-acid batteries and beryllium-containing waste. The Facility will modify signage to inform transporters that beryllium containing waste is not to be delivered to the Facility.

*Done in the  
AC/PSD  
action*



Beryllium-containing waste is not inherent to local waste. The EPA defines this waste as that generated by a foundry, extraction plant, ceramic plant or propellant plant. The low beryllium stack emissions that supported the Departments decision to remove the requirement for testing of beryllium emissions, also supports the fact that this type of waste is not inherent in the waste stream.

While the Facility does not solicit these types of waste and does not want these types of waste to be delivered, the Facility prefers to avoid a situation where the Facility is asked to provide evidence that something is not being delivered. The Facility can demonstrate that we are not knowingly accepting this material but we cannot prove that lead batteries or beryllium waste does not exist anywhere and anytime.

#### 2.4 Condition A.11 (3) Unauthorized Fuel

The Facility proposes that Item (a)(8) should be removed from Condition A.11 (3) in its entirety in order for the Title V permit to be consistent with the terms of the June 15, 1995 Amendment of Air Construction Permit PSD-FL-113 that allows for the processing of nonhazardous waste contaminated with virgin or used oil. New Specific Condition 1.e.1 specifically authorizes the firing of non-hazardous solid waste contaminated with virgin or used oil products. The proposed change will not have an effect of air emissions because the Facility because it is consistent with existing operations as defined by the June 15, 1995 permit amendment.

No change  
see response in  
AC/PSD action

#### 2.5 Condition A.11 (5) Other Solid Waste. *Solid Waste From On-Site Operations*

The Facility proposes that three changes are necessary in Article (a) to maintain consistency with regulatory citations throughout the permit. The first change is the reference to 40 CFR 279.10. The Facility proposes that the more current citation is 40 CFR 279.11 (. The second change is the reference to Rule 62-730.181, F.A.C. The Facility proposes that the appropriate citation is 62-710.210. The third and final change is to the Allowable Concentration of Total Halogens. The Facility proposes that the 4000 ppm Allowable Concentration in 40 CFR 279 is the appropriate value instead of the 1000 ppm maximum value. The Facility therefore proposes that a value of 4000 ppm should be used along with the appropriate note citing that "*Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 279.10(b)(10). Such oil is subject to subpart H of Part 266 of this chapter rather than this part when burned for energy recovery unless the presumption of mixing can be successfully rebutted*".

Done in the  
AC/PSD  
action

#### 2.6 Condition A.11 (5) Other Solid Waste. *Solid Waste From On-Site Operations*

Condition (5)(c) presents specific test methods for constituents/properties. The Facility proposes that the Test Methods in Item (c) do not fully represent the correct test method or the full range of currently available test methods. The Facility proposes that the condition should be amended by adding " or equivalent EPA approved methods" to the condition.

See the  
"NOTE"

2.7 Condition A.11 (7)

The Facility proposes that Items 5(a), 5(b) and 5(c) of *Solid Waste From On-Site Operations* and (7)(b), (7)(f) and (7)(g) of *Solid Waste From Off-Site Operations* should be added to Item (7)(i) of *Solid Waste From Off-Site Operations* and that a new condition should be created to consolidate all terms related to the June 15, 1995 Amendment of Air Construction Permit PSD-FL-113 that allows for the processing of on-site and off-site nonhazardous waste contaminated with virgin or used oil. Consolidation of these terms will not have an effect on air emissions and would avoid potential confusion in reporting data to the Department. As an example, the amount of nonhazardous waste contaminated with virgin or used oil cannot exceed twenty (20) percent by weight of the total solid waste input however Condition (7) limits the total of all items (including b, f, g and i) to five (5) percent. The proposed change would require a re-labeling of conditions however the results would yield a permit condition that is consistent with the underlying June 15, 1995 permit amendment.

Done in the  
AC 1995  
redline

2.8 Condition A.21 Visible Emissions

The existing condition identifies the opacity monitor as the only method to prove that a violation of the visible emission standard was attributable to one MWC instead of both MWCs. The Facility proposes that there are other methods available to prove that one MWC was the cause of a violation instead of both units. Therefore, the Facility is proposing a modification of the existing language to include "opacity meter results or other method acceptable to the Department" in lieu of "opacity meter results".

reviewed  
opacity

it's the rule quote  
no change

2.8 Condition A.29 Hydrogen Chloride

The condition includes two time weighted averages; 3-hours for the stack concentration and 1-hour for removal efficiency. One common time weighted average is required to translate stack concentration into a removal efficiency, therefore a 3-hour time weighted average is proposed for both conditions.

2.9 Condition A.31 Nitrogen Oxides

The existing condition does not contain the daily arithmetic time-weighted average established in Condition A.51 where EPA Method 19 shall be used to determine the daily arithmetic average NOX emission concentration. The Facility proposes that Condition A.31 should be modified to include the time-weighted average to create a condition that includes both the emission limit and the time-weighted average.

seems OK

2.10 Condition A.37

The existing condition establishes that the duration of excess emissions shall not exceed three (3) hours in any 24 hour period. Other Title V permits including FINAL Permit No.:0570261-001-AV for Hillsborough County Resource Recovery Facility establish that an excess emission event shall be limited to three (3) hours for any one occurrence and do not include the stipulation of one per day.

no change  
see AC 1995  
action

The Facility proposes that the existing condition should be modified to be consistent with the Hillsborough condition.

The EPA has proposed an amendment to the startup, shutdown and malfunction provisions in the NSPS and EG for large MWC's ( Federal Register: December 18, 2000, Volume 65, Number 243). The Facility is proposing that the Final Title V permit should include a permit note that recognizes this pending EPA amendment and that the amendment can be incorporated in to the Title V permit as a permit amendment.

### 2.11 Condition A.70

Item c of Condition 70 states that CEMS data shall be recorded during periods of startup, shutdown and malfunction, but shall be excluded from emission averaging calculations for CO, SO2 and opacity. The Facility proposes that NOX should also be included within this condition because NOX emissions are not controlled to normal levels when either the MWC or SNCR system is subject to startup, shutdown or malfunction conditions.

*✓ rule for inclusion... if not, then no*

### 3.0 Appendix I-1. List of Insignificant Emissions Units and/or Activities

The Facility would like to add a new ash conveyor to the scope presently considered in the group titled Ash Conveyors. The new conveyor will transfer ash from the ash storage building to the shared fence at the Recyclable 100, Inc. facility. Therefore as provided by Covanta of Lake, Inc. will be wetted in a manner consistent with existing operations.

*Add to App. I*

Recyclable 100, Inc. is separate from the Covanta of Lake, Inc. facility and is not owned or operated by Covanta Energy Corporation or any subsidiary or affiliate of Covanta. Recyclable 100, Inc. has secured an exemption from air permitting based upon Rule 62-210.300(3)(b)2., F.A.C. A copy of the exemption is provided herein as Appendix A.

The new conveyor will be designed and installed by Recyclable 100, Inc. and according to the information provided by Recyclable 100, Inc., will be fully enclosed and will therefore be an insignificant emission source in accordance with Rule 62-210.300(3)(b)2., F.A.C. Information pertaining to the conveyor design is provided as Appendix B of this document.

The Facility would like to add a new ash residue transfer conveyor system to the scope presently considered in the group titled Ash Conveyors. The new conveyor will transfer ash residue from the Facility's ash residue storage building to the ash residue storage building across the shared fence at the Recyclable 100, Inc. materials recovery facility. Therefore as provided by Covanta of Lake, Inc. the ash residue will be wetted in a manner consistent with existing operations.

The Recyclable 100, Inc material recovery facility is separate from the Covanta of Lake, Inc. facility and is not owned or operated by Covanta Energy Corporation or any subsidiary or affiliate of Covanta. Recyclable 100, Inc. has secured an exemption from air

permitting based upon Rule 62-210.300(3)(b)2., F.A.C. A copy of the exemption is provided herein as Appendix A.

The new ash residue transfer conveyor system will be designed and installed by Recyclable 100, Inc. and according to the information provided by Recyclable 100, Inc., will be fully enclosed and will therefore be an insignificant emission source in accordance with Rule 62-210.300(3)(b)2., F.A.C. Following completion of construction/installation of the new ash residue transfer conveyor system, Covanta Lake will assume ownership and responsibility for the systems long term operation and maintenance. Information pertaining to the new ash residue transfer conveyor system design is provided as Appendix B of this document.

**Appendix A**

**Recyclable 100, Inc. Permit Correspondence**



Jeb Bush  
Governor

# Department of Environmental Protection

DEC 20 2001

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803 3767

David B. Struhs  
Secretary

cc: Nick  
Kyle

Recycling 100, Inc.  
1616 South 14<sup>th</sup> Street  
Orlando FL 34748

OCD-AP-00-278

Attention: Dennis Kenney, President

Lake County - AP  
Oklahumka Materials Recovery Facility  
Permit Exemption

Dear Mr. Kenney:

In response to a letter submitted on your behalf by Steven C Cullen, P.E., Koogler & Associates, requesting an exemption from air permitting for the above-referenced facility, the Department confirms that Rule 62-210.300(3)(b)2., F.A.C. provides a generic air pollution permit exemption for facilities that meet the following criteria:

- a. No emissions unit or pollutant-emitting activity within the facility would be subject to any unit-specific regulatory requirement;
- b. The facility would not emit or have the potential to emit:
  - (i) 1,000 pounds per year or more of lead and lead compounds expressed as lead;
  - (ii) 1.0 ton per year or more of any hazardous air pollutant;
  - (iii) 2.5 tons per year or more of total hazardous air pollutants;
  - (iv) 25 tons per year or more of carbon monoxide, nitrogen oxides and sulfur dioxide;
  - or
  - (v) 10 tons per year or more of any other regulated pollutant; and
- c. The facility would not emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source, nor would the facility be a Title V source for any other reason.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Dennis Kenney, President  
Oklahumka Materials Recovery Facility  
OCD-AP-00-278  
Page 2

Based on information provided in the letter received November 20, 2000, the referenced facility located on Haywood Worm Farm Road, 0.6 miles S. of SR 48, Okahumpka, Lake County, appears to qualify for this air permit exemption. Therefore, no air permit is required at this time.

In the future, please be aware this source may be required to obtain a permit if the Department establishes an air permitting rule for this source or if the source is the subject of complaints. This office should be notified prior to any significant increase in the source emissions. This source will be subject to all applicable sections of the Department's air pollution rule.

If you have questions, please call Alan Zahm at 407-893-3335 or write to the above address.

Sincerely,



L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

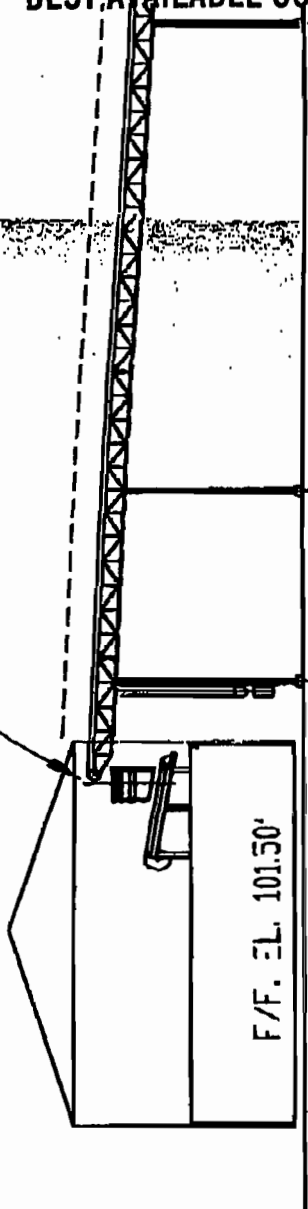
DATE: 12-1-00

AB  
LTK/aze

cc: Steven C. Cullen, P.E., Koogler & Associates

WP. EL. 133.50'

F/F. EL. 101.50'



<b>RECYCLABLE 100, INC.</b>			
<b>LEESBURG</b>		<b>FLORIDA</b>	
DATE	12/5/00	APPROVED BY	CHECKED BY
SCALE	1'130'0"		J.M.C.
G.A. CHARGE CONVEYOR LAKE COUNTY RESOURCE RECOVERY FACILITY			
KAI UMPKA FLORIDA		DRAWING NUMBER	ASH024-1/1
			B

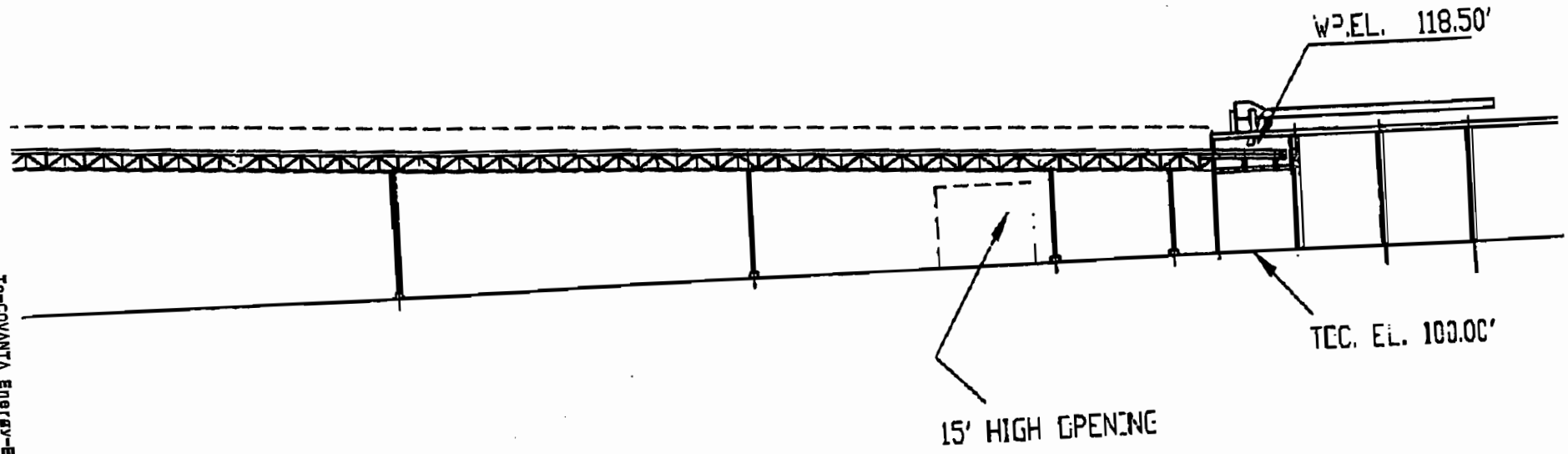
1/10/01	JMC
DATE	BY

CADFILE ASH02410.DWG



Received Aug-16-01 08:38am

From-



15' HIGH OPENING

W.P. EL. 118.50'

TEC. EL. 100.00'

To-COVANTA Energy-Envir

Page 008



**Appendix B**  
**Recyclable 100, Inc. Conveyor Information and Drawing**

August 21, 2001

Mr. Brian Bahor  
Vice President Environmental Permitting  
Covanta Waste to Energy, Inc.  
40 Lane Road  
Fairfield, NJ 07007

Subject: Lake County Resource Recovery Facility  
Ash Residue Transfer Conveyor System

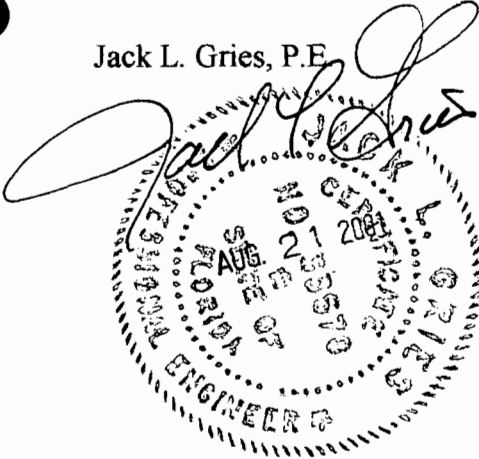
Dear Mr. Bahor:

Please find attached the following certified drawing for the above identified system.

The transfer conveyor system will be fully enclosed and is being designed to accept wetted ash residue as it is currently generated by your Lake County Resource Recovery Facility.

Thank you for your assistance in this matter.

Jack L. Gries, P.E. (Seal)



CERTIFIED BY:  
JACK L. GRIES PE  
LICENSE NO. 33570, FLORIDA  
PHONE NO. 352.787.6161  
715 BALMORAL CIRCLE  
LEESBURG, FL. 34748

August 21, 2001

Mr. Brian Bahor  
Vice President Environmental Permitting  
Covanta Waste to Energy, Inc.  
40 Lane Road  
Fairfield, NJ 07007

Subject: Lake County Resource Recovery Facility  
Ash Residue Transfer Conveyor System

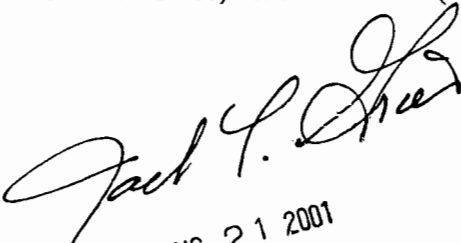
Dear Mr. Bahor:

Please find attached the following certified drawing for the above identified system.

The transfer conveyor system will be fully enclosed and is being designed to accept wetted ash residue as it is currently generated by your Lake County Resource Recovery Facility.

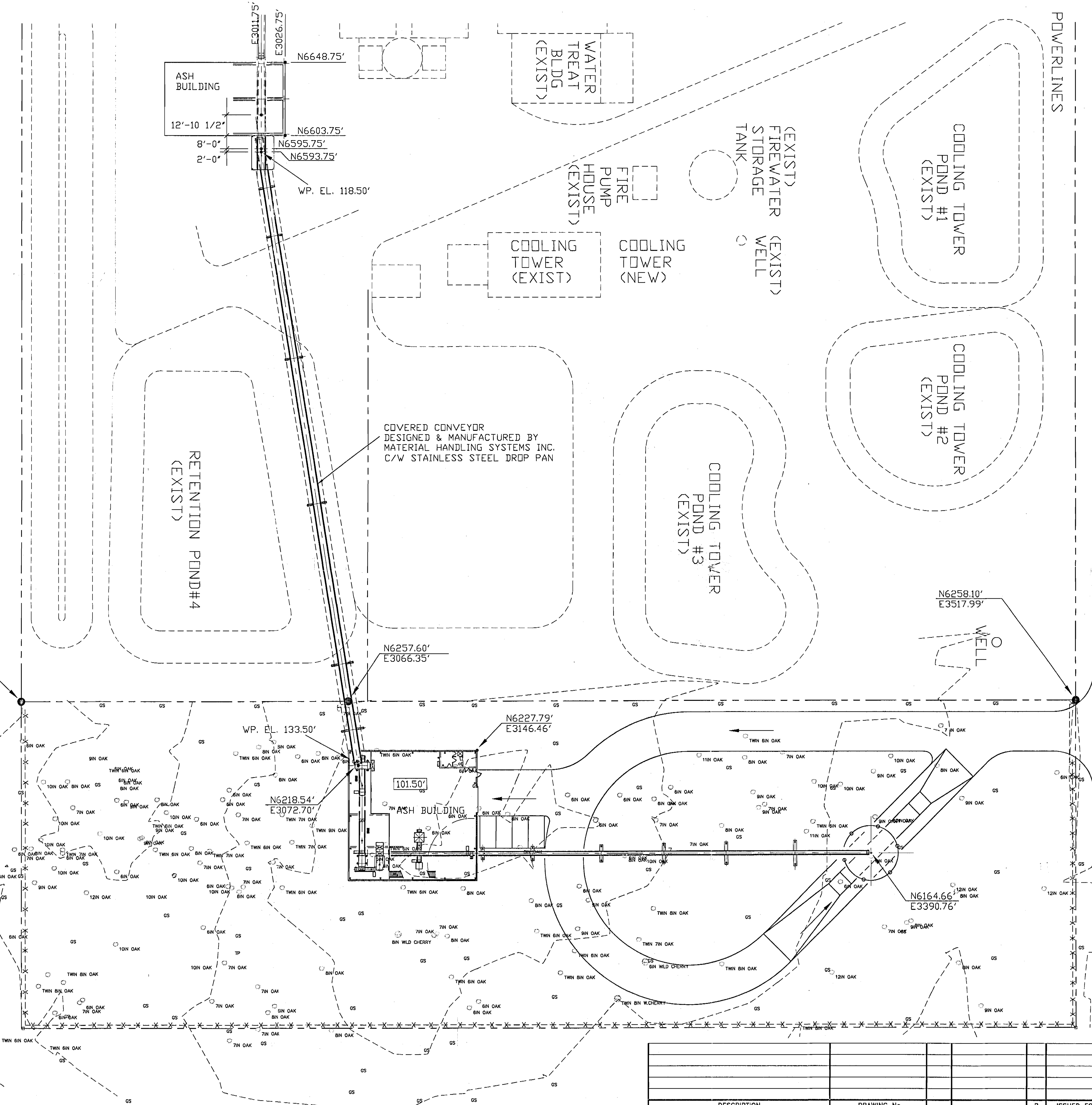
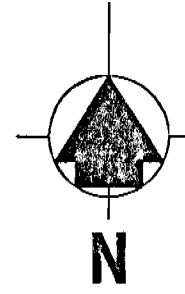
Thank you for your assistance in this matter.

Jack L. Gries, P.E. (Seal)



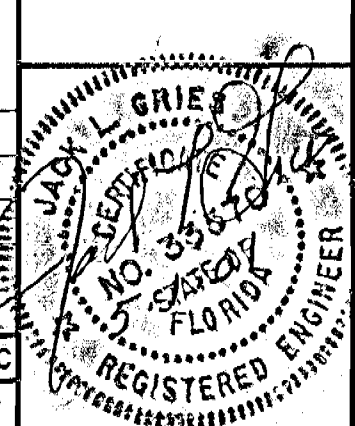
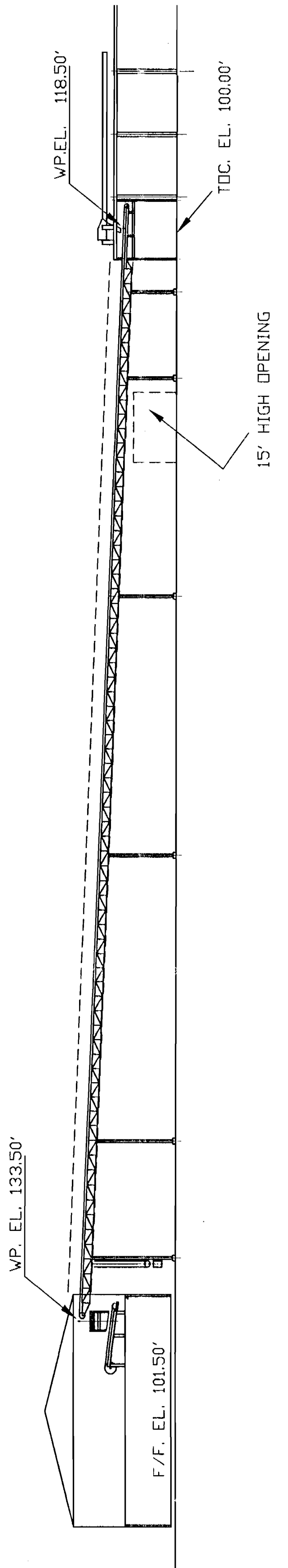
AUG. 21 2001

CERTIFIED BY:  
JACK L. GRIES PE  
LICENSE NO. 33570, FLORIDA  
PHONE NO. 352.787.6161  
715 BALMORAL CIRCLE  
LEESBURG, FL. 34748



HAYWOOD WORM FARM ROAD

POWERLINES



**RECYCLABLE 100, INC.**  
**LEESBURG FLORIDA**  
 DATE 12/5/00 APPROVED BY CHECKED BY DRAWN BY  
 SCALE 1'30"=0' J.M.C.  
 G.A. CHARGE CONVEYOR  
 LAKE COUNTY RESOURCE RECOVERY FACILITY  
 OKAHUMPKA FLORIDA  
 DRAWING NUMBER  
 ASH024-1/1

DESCRIPTION	DRAWING No	DATE	ISSUED TO	NO.	REVISION	DATE	BY
REFERENCE DRAWINGS							