

Mitchell, Bruce

From: Zhu, Yi
Sent: Wednesday, September 25, 2002 3:14 PM
To: Mitchell, Bruce
Cc: Sheplak, Scott
Subject: RE: EARS to ARMs: Upload check for Covanta Lake, Inc.: 0690046-001-AV and 0690046-003-AC.

The upload was complete 9/19. Thanks.

-----Original Message-----

From: Mitchell, Bruce
Sent: Monday, April 01, 2002 4:37 PM
To: Zhu, Yi
Cc: Sheplak, Scott
Subject: EARS to ARMs: Upload check for Covanta Lake, Inc.: 0690046-001-AV and 0690046-003-AC.

4/1/02

Dear Yi,

Here's another one for your review for ARMS upload. The information/data lies in 0690046-DEP. Many thanks.

Bruce Mitchell

Permit File Scanning Request from Elizabeth

Priority: -ASAP (Public Records Request, etc.) -Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
0690046	001	AV			

- File Approved For Disposal Correspondence Intent Permit Draft
 Return File to BAR Amendment Application OGC Proposed

Document Date 9/25/02

Mitchell, Bruce

To: Kuberski, Garry
Cc: Turner, John B.; Fancy, Clair; Sheplak, Scott
Subject: FW: Covanta, permit 0690046-001-AV

-----Original Message-----

From: Mitchell, Bruce
Sent: Tuesday, May 14, 2002 11:07 AM
To: Linero, Alvaro
Subject: RE: Covanta, permit 0690046-001-AV

5/14/02

The maximum permitted capacity is 69,000 lbs/hr, not to be exceeded. The 110% issue associated with dioxins/furans does not replace the Department's Rule 62-297.310(2), F.A.C., which assures that the unit is tested at 90 to 100% of permitted capacity, but not greater than the permitted capacity; and, if the unit is tested less than 90% of permitted capacity, then operation is restricted to 110% of the capacity tested until another test can be scheduled at a higher capacity, but not greater than permitted capacity.

Bruce Mitchell

-----Original Message-----

From: Linero, Alvaro
Sent: Tuesday, May 14, 2002 10:32 AM
To: Mitchell, Bruce
Cc: Sheplak, Scott
Subject: FW: Covanta, permit 0690046-001-AV

Bruce, Scott: Can you guys handle? If not just shoot it back.

Thanks. Al.

-----Original Message-----

From: Kuberski, Garry
Sent: Tuesday, May 14, 2002 10:04 AM
To: Arif, Syed; Linero, Alvaro
Cc: Turner, John B.
Subject: Covanta, permit 0690046-001-AV

Viet Ta of Covanta asked a question about paragraph A7 of permit 0690046-001-AV, Covanta, Lake County Resource Recovery Facility. The question was about the maximum capacity of 69,000 pounds steam per hour for each of the 2 municipal waste combustors.

Condition A7(b) states in part that the throughput shall not exceed 69,000 pounds steam per hour while paragraph A7 (c) and A9 limit the load level to 110% of the maximum demonstrated unit load achieved during the most recent dioxin/furan performance, 4 hour average.

According to Viet Ta of Covanta, 110% of the maximum demonstrated unit load referenced above, is more than 69,000 pounds steam per hour.

The question is:

Is the 69,000 lb-steam/hr a maximum limit that cannot be exceeded or can they use 110% of the maximum demonstrated unit load.?

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Mitchell, Bruce

From: Mitchell, Bruce
Sent: Tuesday, May 14, 2002 11:17 AM
To: Kuberski, Garry
Cc: Turner, John B.; Fancy, Clair; Sheplak, Scott
Subject: FW: Covanta, permit 0690046-001-AV

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From: Mitchell, Bruce
Sent: Tuesday, May 14, 2002 11:07 AM
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Subject: RE: Covanta, permit 0690046-001-AV

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The question is:

Is the 69,000 lb-steam/hr a maximum limit that cannot be exceeded or can they use 110% of the maximum demonstrated unit load.?

Mitchell, Bruce

To: Zhu, Yi
Subject: RE: EARS data for 0690046

3/1/02

Dear Yi,

That was quick....you're good! Have a great week-end.

Bruce

-----Original Message-----

From: Zhu, Yi
Sent: Friday, March 01, 2002 2:58 PM
To: Mitchell, Bruce
Subject: EARS data for 0690046

It is in EARS as 0690046-DEP. You can work on it now. Yi

Mitchell, Bruce

To: BBahor@CovantaEnergy.com
Cc: Fancy, Clair; Sheplak, Scott
Subject: Drafts of the AC and AV permitting projects: Covanta Lake, Inc.: Lake County RRF: 0690046-001-AV & 0690046-003-AC.

10/19/2001

Dear Brian,

I apologize for the delay in getting the attached documents to you, but I believe that I have addressed the comments that you provided such that there are no surprises to you on the responses. I look forward to your evaluation and response. Give me a call if there are any readability problems or to discuss the projects. Take care.

Bruce Mitchell
850/413-9198

0690046.001.PD.doc 0690046p.001AV.doc 0690046.003.FD.DOC 0690046.003AC.letterA
C.Final.D...

Mitchell, Bruce

To: Pollock, Ross
Cc: Fancy, Clair; Sheplak, Scott; Friday, Barbara
Subject: Posting of PROPOSED permit project: 0690046-001-AV: Covanta Lake, Inc.

11/2/2001

Ross,

I have posted the permitting project's documents at:

o: Bar/Title V/Bruce/Permits/0690046

The documents that are associated are:

0690046.001.PD
0690046.SOB
0690046p.001AV
0690046H
0690046G

Many thanks for your help on the posting of the project.

Bruce

Mitchell, Bruce

From: Bahor, Brian [BBahor@CovantaEnergy.com]
Sent: Tuesday, September 25, 2001 9:21 AM
To: Mitchell, Bruce
Subject: Lake Title V

Bruce - this email is a followup to a brief voice mail that I left last week.

The original DRAFT Title V permit for the Lake facility established a design rated capacity of 250 TPD and a maximum rated capacity of 288 TPD. While there are also heat release and steam limits, the purpose of this email is to clarify how the tonnage value is determined. The DRAFT Title V did not establish how to apply the calendar monthly approach however it was logical that a measured field operating parameter would apply to the maximum value, not a design value.

The Initial Title V includes the same TPD values however Condition A.7(a) includes a reference to A.93 whereas A.7(b) does not. We believe that the reference to A.93 in A.7(a) should be removed to make the Initial Title V consistent with the DRAFT Title V and several other Title V permits issued to MWCs in Florida. Condition A.12 and A.79 of the South Broward Title V Permit and Condition A.7 and A.62 of the Pinellas Title V permit establish that the maximum MSW charging rate is determined as a calendar monthly average. The change proposed above for Lake would make the Lake permit consistent with the other permits.

Please call or email with any thoughts or questions.

As always, wish you well.

Brian

Mitchell, Bruce

From: Glenn, Lisa
Sent: Thursday, September 13, 2001 11:51 AM
To: Mitchell, Bruce; Beason, Doug
Cc: Sheplak, Scott; Fancy, Clair; Kozlov, Leonard
Subject: RE: Covanta Lake, Inc.: 0690046-001-AV and 0690046-003-AC: Extension of Time to File for an Administrative Hearing.

OK, Bruce, we'll do the order granting extension as soon as I get the request.

Lisa

Mitchell, Bruce

To: Beason, Doug
Cc: Glenn, Lisa; Sheplak, Scott; Fancy, Clair; Kozlov, Leonard
Subject: Covanta Lake, Inc.: 0690046-001-AV and 0690046-003-AC: Extension of Time to File for an Administrative Hearing.

9/13/2001

Dear Doug,

Based on an unresolved permitting issue contained in the above referenced permitting projects, the permittee or the attorney representing the facility will be asking for a 60-day extension to file for an administrative hearing. Please grant the extension. If there are any questions, please give me a call. Many thanks and take care.

Bruce Mitchell
413-9198

Mitchell, Bruce

From: Bahor, Brian [BBahor@CovantaEnergy.com]
Sent: Monday, September 10, 2001 3:58 PM
To: Mitchell, Bruce
Subject: Lake

Bruce, after we spoke today, I informed facility personel and was informed of a recent event. I am "cutting and pasting" information about a recent event at Lake;

Lake had a malfunction last Friday that resulted in excess CO emissions over 2 hours (from 2:28 to 4:45 AM). We called FDEP's Garry Kuberski and his boss John Turner to report the event. While on the phone we asked for their permission to startup the boiler at 4PM. They refused. We had to wait until 5 AM the following day to startup the boiler.

Rule 62-210.700(1), FAC, states: "...duration of excess emissions shall be minimized but in no case exceed 2 hour in any 24 hours period unless specifically authorized by the Department for longer duration."

Rule 62-210.700(5), FAC, states: "Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest."

Perhaps we should remind Bruce that the rules provide the Department authority to give us what we asked for. Having us wait 12 hours to start up a boiler is not "consistent with the public interest."

We requested that Lake have the same provisions as Hillsborough becasue we thought that it set a precedent that was allowable per State rules. I have since learned that McKay Bay and other s have the Hillsborough language. This is something that we would like to preserve for several reasons including;

1. Its been done before
2. It is not less stringent that the federal or state rule
3. the absence of a detailed definition of "occurence" leads to multiple and subjective interpretations by field personnel
4. The Lake event illustrates that the practice does not yeildd a better environment. MSW must still be processed in accordnace with standards.
5. Why shut down a facility for a day due to an occurrence?

I dont know if you are done yet or not but thought that you might find the above event to be relevant. I have not had a chance to research the event so I am going on the strength of our field personnel in reporting a complete story.

Brian

Mitchell, Bruce

From: Kuberski, Garry
Sent: Monday, April 30, 2001 3:32 PM
To: Mitchell, Bruce
Cc: Turner, John B.
Subject: Ogden Martin, Fl, Be, VOC

Fluoride, Beryllium and VOC were tested Jan 2000 and in 1996. The permit required testing once every 5 years. I doubt that I can find any testing for these prior to 1996. The attached stack test report review is the best record that I have in the office. The 1996 test report and others were archived

OM96.xls

Mitchell, Bruce

From: Steve Cullen [scullen@kooglerassociates.com]
Sent: Monday, August 13, 2001 4:45 PM
To: Kyle Garrett
Cc: Mitchell, Bruce
Subject: Covanta/Ogden: Inclusion of transfer conveyor in Title V Permit

Covanta.doc

Dear Kyle:

I spoke with Bruce Mitchell (FDEP Title V Section) earlier in regards to the ash transfer conveyor from the ash storage building to the shared fence at the Recyclable 100 facility.

The Title V permit is now out for public comment in DRAFT form. The comment period runs until August 27, 2001. Shortly thereafter, barring comments resulting in significant changes, the permit will be in PROPOSED form for 55 days for EPA comments. After that, the Title V permit will be FINAL.

Bruce told me that the ash storage building vents and ash conveyors are described in the DRAFT permit as insignificant activities. He would be willing to add the transfer conveyor as another insignificant activities, if one of two conditions are met:

1. The ash is wetted, and the conveyor is covered, or
2. The conveyor is enclosed.

Bruce also said that this change could be initiated by a letter from Covanta's Responsible Official, and that the letter could come at any time. FDEP receipt of the letter before August 27 would be a clean way to address this.

A draft letter is attached for your use.

Steven C. Cullen, PE
Koogler & Associates

8-16-01

~ 11:45 spoke w Brian Bahor - would need R.O. signature on the request letter, the P.E. seal on the assessment regarding the PM₁₀ potential from the transfer activity - it < 5 TGY, then subject to the e.u. exemption per Rule 62-210.300(b), F.A.C.
B

Mitchell, Bruce

To: Laisure, Debra
Cc: Shine, Caroline; Turner, John B.
Subject: RE: Covanta

7/31/02

No.

Bruce

-----Original Message-----

From: Laisure, Debra
Sent: Monday, July 29, 2002 3:07 PM
To: Mitchell, Bruce
Cc: Shine, Caroline; Turner, John B.
Subject: FW: Covanta

Bruce -

ARMs indicated that Covanta was your project so Caroline asked me to forward this to you for your input. John, Caroline and I have reviewed sections of the initial T-V permit and just aren't sure.

Thanks,
Deb

-----Original Message-----

From: Shine, Caroline
Sent: Monday, July 29, 2002 2:05 PM
To: Kozlov, Leonard; Laisure, Debra; Turner, John B.
Subject: Covanta

John or Deb,

Is covanta allowed in their permit to run contaminated soil through the incinerator? Need to know as soon as possible.

Thanks
Caroline

Mitchell, Bruce

From: Laisure, Debra
Sent: Monday, July 29, 2002 3:07 PM
To: Mitchell, Bruce
Cc: Shine, Caroline; Turner, John B.
Subject: FW: Covanta

Bruce -

ARMs indicated that Covanta was your project so Caroline asked me to forward this to you for your input. John, Caroline and I have reviewed sections of the initial T-V permit and just aren't sure.

Thanks,
Deb

-----Original Message-----

From: Shine, Caroline
Sent: Monday, July 29, 2002 2:05 PM
To: Kozlov, Leonard; Laisure, Debra; Turner, John B.
Subject: Covanta

John or Deb,

Is covanta allowed in their permit to run contaminated soil through the incinerator? Need to know as soon as possible.

Thanks
Caroline

Mitchell, Bruce

To: Beason, Doug
Cc: Fancy, Clair; Sheplak, Scott
Subject: Extension of Time to File for an Administrative Hearing: Covanta Lake, Inc.

7/17/2001

Doug,

Mary Smallwood, Esq., will be requesting for an "Extension of Time to File for an Administrative Hearing" for the Covanta Lake, Inc.'s permitting projects. Please accept the request and grant the extensions (also, please provide me with any paperwork - many thanks). If acted upon, I have not yet seen the response to Mary's request of July 5th? If there are any questions, give me a call at 413-9198. The permitting projects are:
0690046-001-AV and 0690046-003-AC

Take care.

Bruce Mitchell

Mitchell, Bruce

From: Beason, Doug
Sent: Tuesday, July 17, 2001 2:31 PM
To: Mitchell, Bruce
Subject: RE: Extension of Time to File for an Administrative Hearing: Covanta Lake, Inc.

Thanks for the heads up. You did the right thing by including Lisa G. in the loop.

-----Original Message-----

From: Mitchell, Bruce
Sent: Tuesday, July 17, 2001 2:30 PM
To: Beason, Doug
Cc: Fancy, Clair; Sheplak, Scott; Glenn, Lisa
Subject: Extension of Time to File for an Administrative Hearing: Covanta Lake, Inc.

7/17/2001

Doug,

Mary Smallwood, Esq., will be requesting for an "Extension of Time to File for an Administrative Hearing" for the Covanta Lake, Inc.'s permitting projects. Please accept the request and grant the extensions (also, please provide me with any paperwork - many thanks). If acted upon, I have not yet seen the response to Mary's request of July 5th? If there are any questions, give me a call at 413-9198. The permitting projects are:
0690046-001-AV and 0690046-003-AC

Take care.

Bruce Mitchell

Mitchell, Bruce

To: Carter, Kathy
Cc: Fancy, Clair; Sheplak, Scott
Subject: RE:

7/6/2001

Dear Kathy,

I did speak with Clair and Scott after I received a call from Mary Smallwood (attorney for Covanta Lake, Inc.). The request is OK and should be granted for 30 additional days. The permits that are being affected are:
0690046-001-AV and 0690046-003-AC

If there are any questions, please give me a call at 413-9198. Also, please provide me with a copy of the request and any OGC action. Take care.

Bruce

-----Original Message-----

From: Carter, Kathy
Sent: Friday, July 06, 2001 2:20 PM
To: Mitchell, Bruce
Cc: Beason, Doug
Subject:

Bruce:

OGC received a Request for Extension of Time from Covanta Lake, Inc. referring to "A Title V Operation permit (hereafter the "Permits)". They said they have talked with you about the extension, so I am hoping you can give me some information on the draft permits they are referring to, such as the DEP numbers and location so I can go ahead and input receipt into LCT.

Doug: a copy of this request is on its way to you

Kathy C. Carter
OGC
#SC278-9736
(850) 488-9736

Mitchell, Bruce

To: bbahor@covantaenergy.com
Cc: Fancy, Clair; Sheplak, Scott
Subject: Revised DRAFT Title V permit for Covanta Lake, Inc. facility: 0690046-001-AV.

7/10/2001

Dear Brian,

As we spoke of this morning, I am attaching the AC/PSD amendment permit package/Revised DRAFT Title V permit package for your use. Please advise if there is any problems. Take care and glad to see your father improving.

Bruce Mitchell
850/413-9198

0690046d.001AV.003
AC.doc

0690046G.doc

0690046H1.doc

0690046.003AC.letterA
C.Draft.d...

0690046.003.TPD.doc

Mitchell, Bruce

To: Boutwell, Barbara
Cc: Fancy, Clair; Sheplak, Scott
Subject: Posting of DRAFT T-5 permit package for EPA.

7/3/2001

Dear Barbara,

Please post the above referenced permitting project located at the following addresses:

o:Bar/Title V/Bruce/Permits/0690046:
0690046d.001AV.003AC.doc
0690046.SOB.doc
0690046.G.doc
0690046.H1.doc

o:Bar/Title V/Bruce/Permits/0690046.003:
0690046.003.TPD.doc
0690046.003AC.letterAC.Draft.doc
0690046I.003AC.001AV.doc

Thanks.

Bruce

Mitchell, Bruce

From: Boutwell, Barbara
Sent: Tuesday, July 03, 2001 1:04 PM
To: Elizabeth Bartlett; Gracy Danois; Gregg Worley; Joel Huey; Walker, Elizabeth (AIR)
Cc: Mitchell, Bruce
Subject: New Posting #0690046

There is a new posting on Florida's website.

0690046001AV/0690046003AC
Covanta Lake, Inc.
Lake County Resource Recovery Facility

Draft Permit Revision

If you have any questions, feel free to contact me.

Thanks,
Barbara

Mitchell, Bruce

From: Vielhauer, Trina
Sent: Friday, June 22, 2001 3:04 PM
To: Mitchell, Bruce; Sheplak, Scott; Pennington, Jim
Cc: Fancy, Clair; Rhodes, Howard; Beason, Doug
Subject: FW: Covanta, medical waste

FYI.

-----Original Message-----

From: Kuberski, Garry
Sent: Friday, June 22, 2001 2:44 PM
To: Kozlov, Leonard; Shine, Caroline; Turner, John B.; Ali, Alison; Vielhauer, Trina
Subject: Covanta, medical waste

We have just completed a quarterly inspection of Covanta, Lake County.

They have stopped burning medical waste. The last entry in their medical waste log was June 6, which means that the last day medical waste was burned was June 6, 2001.

The conveyer for the boxed medical waste has been removed.

No violations were found.

Sheplak, Scott

From: Mitchell, Bruce
Sent: Friday, June 22, 2001 12:36 PM
To: Fancy, Clair
Cc: Sheplak, Scott
Subject: FW: Covanta Lake, Inc.

*Bruce,
Please include in our
monthly report.*

6/22/2001

Dear Clair,

I made one additional change.

Bruce

*Scott
6/29*

-----Original Message-----

From: Mitchell, Bruce
Sent: Friday, June 22, 2001 12:25 PM
To: Fancy, Clair
Cc: Sheplak, Scott
Subject: FW: Covanta Lake, Inc.

6/22/2001

Dear Clair,

I have updated the blurb.

Bruce

-----Original Message-----

From: Mitchell, Bruce
Sent: Friday, June 22, 2001 12:18 PM
To: Fancy, Clair
Cc: Sheplak, Scott
Subject: Covanta Lake, Inc.

6/22/2001

Dear Clair,

Here is a blurb that overviews the latest action with Covanta Lake, Inc., regarding the finalization of the Consent Order and the issuance potential of the initial Title V Operation Permit for the Lake County Resource Recovery Facility:

The Consent Order with Covanta Lake, Inc. (formerly NRG/Recovery Group, Inc. and Ogden Martin of Lake, Inc.), was signed on June 13th and the penalty amount was for \$104,100. The Consent Order addressed failed performance tests regarding mercury emissions at their Lake County Resource Recovery Facility. Also, the Bureau of Air Regulation will issue a Revised DRAFT Title V Operation Permit for the Lake County Resource Recovery Facility on June 25th...this is the last facility in the State of Florida to obtain the initial Title V Operation Permit. The most important feature of the permit is the company's commitment to cease processing biomedical waste by September 1, 2001.

Bruce

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Bruce

6-19-01
Scott,
blurb read & edit.
Hester
Bum
Clair
Well lets issue
tomorrow, 6/22.
Scott
Small stuff
looks good!
lots of work
Scott
6/22

Mitchell, Bruce

To: bbahor@covantaenergy.com
Cc: Fancy, Clair; Sheplak, Scott
Subject: Edited draft PSD amendment letter.

6/21/2001

Dear Brian,

Many thanks for your time today, especially with the pressing personal issue with your dad. Hope he will be OK! I have attached the draft letter amendment and Revised DRAFT Title V Operation Permit for your review to confirm the changes agreed to by us. Please advise of any concerns. Take care.

Bruce Mitchell
850/413-9198

0690046.003AC.letterA
C.Draft.d...

0690046d.001AV.003
AC.doc

Mitchell, Bruce

From: Bahor, Brian [BBahor@CovantaEnergy.com]
Sent: Wednesday, June 20, 2001 4:34 PM
To: Mitchell, Bruce
Subject: Draft Permit

Bruce, thanks for the updated draft. At this time, everything looks okay with the exception of Item 4.b which is Specific Condition 1.b.

The draft as written would effectively de-rate the facility. Existing condition 1.b provides the facility with the ability to operate at 288 tpd (69,000 lb/hr) each and every day. The draft condition would not allow that to occur.

I am providing alternative language that is essentially the same as the April 4, 2001 permit application. I am also providing the citation from the Pasco permit so you can see the equivalency language. I hope that this makes our call more efficient.

Brian

Alternative 1.b

The maximum individual MWC throughput shall not exceed 288 tons MSW per day. This is equivalent to 69,000 pounds of steam per hour (four hour average) per emissions unit. The maximum individual MWC steam generation rate as a four hour block average shall not exceed 110 % of the four hour block average during the most recent dioxin/furan performance test demonstrating compliance with the applicable limit for dioxins/furans however in no case shall the four hour block average exceed 69,000 pounds per hour. The maximum individual MWC throughput shall not exceed the maximum capacity as a 12-month rolling average according to the Facility's truck scale weight data, refuse pit inventory data and other data as necessary to establish the average daily throughput of MSW. The 12 month rolling average is used for determining the maximum acceptable amount of waste that has assigned weight percentages including, tires, solid waste e contaminated with oil and other solid waste/ segregated loads.

Pasco Reference Citation

A.3. Capacity.

(a) Each of the three MWC's have a design rated capacity of 350 tons of municipal solid waste (MSW) per day, and 140 MMBtu heat input per hour, assuming a heating value of 4,800 Btu per pound. The maximum individual MWC's throughput shall not exceed 114% of either the design MSW charging rate of 350 TPD or the heat input of 140 MMBtu/hr. This is equivalent to a limit of 103,850 pounds of steam per hour (four-hour average) per emissions unit.

(b) The procedures specified in paragraph (1) shall be used for calculating municipal waste combustor unit capacity as defined under 40 CFR 60.51b.

(1) For municipal waste combustor units capable of combusting municipal solid waste continuously for a 24-hour period, municipal waste combustor unit capacity shall be calculated based on 24 hours of operation at the maximum charging rate. The maximum charging rate shall be determined as specified in paragraphs (i) and (ii) as applicable.

(i) For combustors that are designed based on heat capacity, the maximum charging rate shall be calculated based on the maximum design heat input capacity of the unit and a heating value of 12,800 kilojoules per kilogram for combustors firing refuse-derived fuel and a heating value of 10,500 kilojoules per kilogram for combustors firing municipal solid waste that is not refuse-derived fuel.

(ii) For combustors that are not designed based on heat capacity, the maximum charging rate shall be the maximum design charging rate. [40 CFR 60.31b and 40 CFR 60.58b(j); Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and PSD-FL-127, Specific Condition No. 1]

The new name for ENERGY is COVANTA.

Please Note: Effective 3/14/2001, Ogden Corporation is now Covanta Energy Corporation
(NYSE: COV).
Our new e-mail address is First Initial, Last Name, @CovantaEnergy.com (e.g.
JSmith@CovantaEnergy.com)
Please make this change in your address book. Our new web-site is www.CovantaEnergy.com.

Mitchell, Bruce

To: bbahor@covantaenergy.com
Cc: Fancy, Clair; Sheplak, Scott
Subject: Changes to the draft of the PSD amendment letter.

6/20/2001

Dear Brian,

Based on discussions regarding issues 4. and 5., yesterday, I met with Scott and Ed this morning and made some changes to them. Please look at the changes for tomorrows discussion. Take care.

Bruce Mitchell
850/413-9198

Mitchell, Bruce

To: bbahor@covantaenergy.com
Cc: Fancy, Clair; Sheplak, Scott
Subject: Draft of PSD amendment letter for the Covanta Lake, Inc. facility.

6/19/2001

Dear Brian,

It was good to hear from you yesterday. I believe that we are near the point that we can go out with the Intent package for a combined Public Notice for the AC/PSD and Title V permits. I have attached a copy of the PSD amendment letter that we spoke about and will go over issue by issue as soon as you have a chance to receive and review it. Please call me and advise. I look forward to hearing from you. Take care.

Bruce Mitchell
850/413-9198

0690046.003AC.letterA
C.Draft.d...

Mitchell, Bruce

From: Boutwell, Barbara
Sent: Monday, June 18, 2001 12:40 PM
To: Elizabeth Bartlett; Gracy Danois; Gregg Worley; Joel Huey; Walker, Elizabeth (AIR)
Cc: Mitchell, Bruce
Subject: New Posting #0250348

There is a new posting on Florida's website.

0250348004AV
MIAMI DADE RRF/MONTENAY

Proposed Permit Revision

If you have any questions, feel free to contact me.

Thanks,
Barbara

Mitchell, Bruce

From: Bahor, Brian [BBahor@CovantaEnergy.com]
Sent: Monday, June 18, 2001 5:13 PM
To: Mitchell, Bruce
Subject: NOX Averaging Period

Bruce , thanks for the heads up so I could do my homework. The regulatory logic is as follows;

1. Table 1 of 60.33b establishes an emission limit of 205 ppm but not the compliance period for this limit.
2. 60.38b Compliance and Performance Testing references the performance testing requirements for existing facilities in 60.58b as being applicable to existing facilities.
3. 60.58b(h) establishes the NOX test procedures and compliance procedures. The application of a 24 hour (or daily) standard is repeated throughout this section.

Hope that this helps.

Brian

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Mitchell, Bruce

From: Vielhauer, Trina
Sent: Tuesday, June 05, 2001 2:22 PM
To: Kozlov, Leonard; Shine, Caroline; Kuberski, Garry; Turner, John B.
Cc: Beason, Doug; Garfein, Vivian; Rhodes, Howard; Fancy, Clair; Sheplak, Scott; Mitchell, Bruce; Pennington, Jim; Costello, Martin
Subject: Ogden/Covanta Consent Order

I just spoke with Nancy Tammi and Mary Smallwood regarding the Ogden/Covanta Consent Order. We have reached a final agreement [attached] and the company anticipates signing the Order this week. They will fax me a copy and forward the original directly to Vivian for signature and filing. As soon as I receive the signed fax, I will let everyone know.

Thanks for all of your hard work [and patience!!] on this.

Trina

draft 5 no
strikethroughs.doc

Mitchell, Bruce

From: Garfein, Vivian
Sent: Tuesday, June 05, 2001 3:02 PM
To: Vielhauer, Trina; Kozlov, Leonard; Shine, Caroline; Kuberski, Garry; Turner, John B.
Cc: Beason, Doug; Rhodes, Howard; Fancy, Clair; Sheplak, Scott; Mitchell, Bruce; Pennington, Jim; Costello, Martin
Subject: RE: Ogden/Covanta Consent Order

Thanks to you for your great work on this in bringing us to this point!

-----Original Message-----

From: Vielhauer, Trina
Sent: Tuesday, June 05, 2001 2:22 PM
To: Kozlov, Leonard; Shine, Caroline; Kuberski, Garry; Turner, John B.
Cc: Beason, Doug; Garfein, Vivian; Rhodes, Howard; Fancy, Clair; Sheplak, Scott; Mitchell, Bruce; Pennington, Jim; Costello, Martin
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Trina

<< File: draft 5 no strikethroughs.doc >>

Mitchell, Bruce

To: Kuberski, Garry
Cc: Fancy, Clair; Sheplak, Scott; Turner, John B.; Kozlov, Leonard
Subject: RE: Ogden Martin, Fl, Be, VOC

5/1/2001

Dear Garry/John,

Many thanks for the fax and e-mail information. I'm currently working on a request that your information will be very helpful in the review. Take care.

Bruce

-----Original Message-----

From: Kuberski, Garry
Sent: Monday, April 30, 2001 3:32 PM
To: Mitchell, Bruce
Cc: Turner, John B.
Subject: Ogden Martin, Fl, Be, VOC

Fluoride, Beryllium and VOC were tested Jan 2000 and in 1996. The permit required testing once every 5 years. I doubt that I can find any testing for these prior to 1996. The attached stack test report review is the best record that I have in the office. The 1996 test report and others were archived

. << File: OM96.xls >>

4-30-01

2:40

Spoke w John Turner -
requested any test results
for Be, ¹⁰⁹Pb & VOC.

Mitchell, Bruce

From: Vielhauer, Trina
Sent: Wednesday, April 25, 2001 11:14 AM
To: Kuberski, Garry; Kozlov, Leonard; Shine, Caroline; Turner, John B.
Cc: Garfein, Vivian; Rhodes, Howard; Sheplak, Scott; Fancy, Clair; Mitchell, Bruce; Pennington, Jim
Subject: Ogden/Covanta

Hi folks. I traded voicemails with Mary yesterday. Nancy is forwarding the remaining information related to the 2/99 internal stack test ASAP. I believe she was sending it to me and that I should have it tomorrow morning. I will forward it to you ASAP.

I have not sent out our revised CO and penalty yet. I will send the revised CO and penalty out as soon as we confirm that the 2/99 internal stack test results were acceptable.

Thanks,

Trina

Mitchell, Bruce

From: Vielhauer, Trina
Sent: Wednesday, April 11, 2001 4:23 PM
To: Kozlov, Leonard; Shine, Caroline; Kuberski, Garry; Turner, John B.; Sheplak, Scott; Mitchell, Bruce; Fancy, Clair
Cc: Garfein, Vivian; Rhodes, Howard
Subject: Ogden/Covanta language

Here is a draft revision for you to review. I tried to streamline our "findings" to those necessary to support our Order. Also of note:

1. the CO warning letter is included in the findings so THIS Consent Order [as currently written] will resolve that warning letter also!
2. the civil penalty is \$104,100 as the District and I discussed yesterday;
3. I added language to 16aii regarding Covanta's obligation to fulfill USEPA's requirements once chosen regardless of funding;
4. I added language to 16aii2 to make clear DEP's reimbursement is up to and including the civil penalty amount [i.e. they can't get \$500,000 from us!]
5. paragraph 19 is the typical dispute resolution language we use. I added a bit to the beginning of the standard language to reflect Covanta's suggestion that Vivian/Howard be consulted first.

I think that is the "big" stuff to look for. Thanks!

Trina
s.c. 291-8875

draft 4 co.doc

Mitchell, Bruce

To: Vielhauer, Trina
Cc: Rhodes, Howard; Fancy, Clair; Sheplak, Scott
Subject: Draft Consent Order (OGC FILE No.: 00-1162) comments: Covanta Lake, Inc. (formerly NRG/Recovery Group, Inc./Ogden Martin of Lake).

4/9/2001

Dear Trina,

Thanks for the time this morning regarding the draft Consent Order, which directed me to look from condition #23 through the end. The following comment is made:

o In condition #26, 2nd line of the Public Notice, suggest recognizing/inserting the new name of the facility and text changes as follows (see green color):

.....a Consent Order with Covanta Lake, Inc. (formerly NRG/Recovery Group, Inc.) pursuant to

No other comments are suggested for the text reviewed. Scott and I look forward to discussing the other conditions, for we have some comments and suggestions to make. Take care.

Bruce Mitchell
921-9506

Mitchell, Bruce

From: Vielhauer, Trina
Sent: Monday, April 09, 2001 2:30 PM
To: Mitchell, Bruce
Cc: Rhodes, Howard; Fancy, Clair; Sheplak, Scott
Subject: RE: Draft Consent Order (OGC FILE No.: 00-1162) comments: Covanta Lake, Inc. (formerly NRG/Recovery Group, Inc./Ogden Martin of Lake).

Good point: I drafted this pre-Covanta. Thanks for your thoroughness-I appreciate it. Once we see how the meeting tomorrow goes I will come over and we can discuss the factual/historical stuff.

Have a good afternoon,
Trina

-----Original Message-----

From: Mitchell, Bruce
Sent: Monday, April 09, 2001 2:19 PM
To: Vielhauer, Trina
Cc: Rhodes, Howard; Fancy, Clair; Sheplak, Scott
Subject: Draft Consent Order (OGC FILE No.: 00-1162) comments: Covanta Lake, Inc. (formerly NRG/Recovery Group, Inc./Ogden Martin of Lake).

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Bruce Mitchell
921-9506

Mitchell, Bruce

From: Sheplak, Scott
Sent: Tuesday, April 03, 2001 2:15 PM
To: Beason, Doug; Mitchell, Bruce
Cc: Glenn, Lisa
Subject: OGC Order

Lisa,
Please mail us a copy of the Ogden Martin Systems of Lake, Inc. stipulation order. Doug Beason and Mary Smallwood worked on this.
Thank you

Mitchell, Bruce

From: Sheplak, Scott
Sent: Tuesday, April 03, 2001 2:58 PM
To: Glenn, Lisa
Cc: Mitchell, Bruce
Subject: RE: OGC Order

Anytime this week is fine. Thank you for promptly responding.

-----Original Message-----

From: Glenn, Lisa
Sent: Tuesday, April 03, 2001 2:53 PM
To: Sheplak, Scott
Subject: RE: OGC Order

Scott - I'm up to my eyeballs in some proposed legislation today.... can it wait until the morning, or do I need to go find it now? Let me know.

Lisa

Mitchell, Bruce

From: Bahor, Brian [BBahor@CovantaEnergy.com]
Sent: Wednesday, March 21, 2001 11:34 AM
To: Mitchell, Bruce
Subject: Draft PSD Application

Draft 6.doc

Bruce, as promised, a draft version of the PSD amendment is being submitted. My schedule has me arriving at your office around 1:00 on Monday the 26th. I will stay over so we can complete any work on the morning of the 27th. I should be in the office all of this week so please call with any questions.

<<Draft 6.doc>>

Brian

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