

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



February 15, 2013

Mr. Scott Sheplak
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

SUBJ: Draft Permit No. 0690046-014-AC/PSD-FL-113I
Lake County Resource Recovery Facility

Dear Mr. Sheplak:

Covanta Lake II, Inc., the owner and operator of the Lake County Resource Recovery Facility, is in receipt of the subject draft permit received January 22, 2013. As discussed with you and other Department staff on February 1, 2013, Covanta offers the following comments on the Draft permit:

The table on page 4 of 15 entitled "Baseline Actual Emissions vs. Projected Actual Emissions Used under this Project" specifies new Projected Actual Emissions in tons per year (tpy) in the 3rd column. It is our understanding that the tpy values in the 3rd column of the table are enforceable permit limits that are not to be exceeded. To the extent possible, we suggest that the Final permit more clearly indicate that these values are indeed permit limitations.

Further, and as discussed on February 1st, Covanta has identified an error with the Baseline Actual Emissions for the pollutant NO_x listed in the 2nd column of the table. The value listed (393 tpy) was derived from a previous permitting project and represents the baseline years 2009-2010. In reviewing more recent data (including the recently compiled 2012 annual emissions), Covanta has determined that the correct baseline value is 478 tpy, which is the two-year average of the actual NO_x emissions recorded by the Facility's Continuous Emissions Monitoring System in 2011 and 2012. Utilizing this correct baseline actual emission value, the "Projected Actual Emissions" listed in column 3 should be 517.9 tpy. As stated above, it is our understanding that this value will become an enforceable, not-to-exceed permit limit. Please also note that this new emissions limitation is approximately 20 tons per year less than the equivalent NO_x limitation of 205 ppm specified in the Facility's current permits.

Thank you for your consideration of these comments. If you have any questions, please do not hesitate to contact me at (352) 365-1611.

Mr. Scott Sheplak, P.E.

February 12, 2013

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Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Main".

Gary Main

Facility Manager

Covanta Lake II, Inc.