

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

September 18, 2009

Sent by Electronic Mail - Received Receipt Requested

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

Re: Request for Additional Information
Project Nos. 0690046-008-AC (PSD-FL-113H) and 0690046-009-AV
Covanta Lake II, Inc., Lake County Resource Recovery Facility
Municipal Solid Waste Combustor (MSWC) Units 1 and 2, Request to Burn International Regulated Garbage

Dear Mr. Main:

On August 24, 2009, we received your application for an air construction permit and a Title V air operation permit revision. A request was made to allow the facility to process international regulated garbage in MSWC Units 1 and 2 and to change the averaging period of the segregated loads weight limitation. The existing Lake County Resource Recovery Facility is located at 3830 Rogers Industrial Park Road in Okahumpka, Lake County, Florida. The application indicates that the project is subject to general preconstruction review pursuant to Rule 62-210.300 of the Florida Administrative Code (F.A.C.). The application is considered to be incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- 1. You have implied that your facility has had to divert segregated loads of solid waste materials to other processing facilities due to a permit restriction on the percentage of a segregated load that can be processed on a monthly basis. Please identify the segregated loads diverted from your facility over the last 12 months to other processing facilities due to the averaging period for segregated loads weight limitation in your permit.
- 2. The definition of regulated garbage includes the term "interstate movements", which is assumed to be domestic flights. Since you left this term in the description of "international regulated garbage" (see Appendix B of the application), is it your intention to include regulated garbage from domestic flights as part of this evaluation? If so, please provide how much (tons) of domestic regulated garbage will be processed monthly and annually for each MSWC and describe how this material will be handled (receiving, storage and processing) at this facility. Also, please complete and submit a Segment Description and Rate information part for each MSWC for this waste stream if you intend to process this type of material.
- 3. Complete and submit a Segment Description and Rate information part that represents the "international regulated garbage" proposed for this project for each MSWC. As stated in EPA's Source Classification Code Manual, EPA 450/4-90-003, specifically under Source Classification Code 1-01-012-01, you are to "specify the waste material", which should be stated as "international regulated garbage combustion" in the Segment Description area. This information is necessary for submitting the Annual Operating Report.
- 4. In the Addendum to Compliance Agreement, June 2009, the use of a roll-off container is mentioned in paragraph "i." under Process. Will these roll-off containers be rigid leak-proof containers with tight-fitting lids and capable of being locked? If not, please explain.
- 5. Explain in detail how the operator knows how the municipal solid waste will be comingled with other approved waste to meet the 5% segregated load restriction.

REQUEST FOR ADDITIONAL INFORMATION

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. 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.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Mitchell, at (850)413-9198.

Sincerely.

leffery F. Koerner, Administrator **New Source Review Section**

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

cc: Mr. Gary Main, Facility Manager, Covanta Energy II, Inc.: (gmain@covantaenergy.com)

Mr. Jason M. Gorrie, P.E., Covanta Energy II, Inc.: (jgorrie@covantaenergy.com)

Mr. Viet Ta, Application Contact, Covanta Energy II, Inc.: (vta@covantaenergy.com)

Ms. Caroline Shine, Central District Office: (caroline.shine@dep.state.fl.us)

Ms. Vickie Gibson, DEP BAR Reading File: (victoria.gibson@dep.state.fl.us)

JFK/rbm

To:

gmain@covantaenergy.com

Cc:

jgorrie@CovantaEnergy.com; vta@covantaenergy.com; Shine, Caroline; Gibson, Victoria;

Mitchell, Bruce; Koerner, Jeff

Subject:

Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Attachments:

GaryMainRAI0690046-008-AC(PSDFL113H)0690046-009-

AVCovantaLakeII,Inc.LakeCountyRRF.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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 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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

From: Sent: Main, Gary [GMain@CovantaEnergy.com] Friday, September 18, 2009 1:02 PM

To:

Friday, Barbara

Subject:

RE: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II, Inc., Lake County Resource Recovery Facility

Gary Main
Facility Manager

COVANTA ENERGY

for a cleaner world

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

352.365.1611 ext.226 Fax: 352.365.6359

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Friday, September 18, 2009 12:49 PM

To: Main, Gary

Cc: Gorrie, Jason; Ta, Viet; Shine, Caroline; Gibson, Victoria; Mitchell, Bruce; Koerner, Jeff

Subject: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV -

Covanta Lake II, Inc., Lake County Resource Recovery Facility

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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 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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

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 <a href="https://doi.org/10.1016/jhis.com/this.link.to.the.new.ci.nlm.new.ci.nl

From: Sent: Ta,Viet [VTa@CovantaEnergy.com] Friday, September 18, 2009 1:05 PM

To:

Friday, Barbara

Subject:

RE: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II, Inc., Lake County Resource Recovery Facility

Dear Ms. Friday,

I received the email. Thanks.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Friday, September 18, 2009 12:49 PM

To: Main, Gary

Cc: Gorrie, Jason; Ta, Viet; Shine, Caroline; Gibson, Victoria; Mitchell, Bruce; Koerner, Jeff

Subject: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV -

Covanta Lake II, Inc., Lake County Resource Recovery Facility

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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 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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

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.

From:

Ta,Viet [VTa@CovantaEnergy.com] Friday, Barbara

To:

Sent:

Friday, September 18, 2009 12:58 PM

Subject:

Read: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Your message

VTa@CovantaEnergy.com

Subject:

was read on 9/18/2009 12:58 PM.

From:

System Administrator

To:

Shine, Caroline

Sent:

Friday, September 18, 2009 12:49 PM

Subject:

Delivered:Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Your message

To: gmain@covantaenergy.com

Cc: igorrie@CovantaEnergy.com; 'vta@covantaenergy.com'; Shine, Caroline; Gibson,

Victoria; Mitchell, Bruce; Koerner, Jeff

Subject: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-

113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery

Facility

Sent: 9/18/2009 12:49 PM

was delivered to the following recipient(s):

Shine, Caroline on 9/18/2009 12:49 PM

From:

System Administrator

To:

Koerner, Jeff; Gibson, Victoria; Mitchell, Bruce

Sent:

Friday, September 18, 2009 12:50 PM

Subject:

Delivered:Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Your message

To: gmain@covantaenergy.com

Cc: jgorrie@CovantaEnergy.com; 'vta@covantaenergy.com'; Shine, Caroline; Gibson,

Victoria; Mitchell, Bruce; Koerner, Jeff

Subject:

: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-

113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery

Facility

Sent: 9/18/2009 12:49 PM

was delivered to the following recipient(s):

Koerner, Jeff on 9/18/2009 12:50 PM Gibson, Victoria on 9/18/2009 12:50 PM Mitchell, Bruce on 9/18/2009 12:50 PM

From:

Koerner, Jeff

To: Sent: Friday, Barbara Friday, September 18, 2009 1:09 PM

Subject:

Read: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Your message

To: gmain@covantaenergy.com

Cc: <u>jgorrie@CovantaEnergy.com</u>; 'vta@covantaenergy.com'; Shine, Caroline; Gibson,

Victoria; Mitchell, Bruce; Koerner, Jeff

Subject:

Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-

113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery

Facility

Sent: 9/18/2009 12:49 PM

was read on 9/18/2009 1:08 PM.

From:

Gibson, Victoria

To:

Friday, Barbara

Sent:

Friday, September 18, 2009 12:50 PM

Subject:

Read: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Your message

To: gmain@covantaenergy.com

Cc: igorrie@CovantaEnergy.com; 'vta@covantaenergy.com'; Shine, Caroline; Gibson,

Victoria; Mitchell, Bruce; Koerner, Jeff

Subject

Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-

113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery

Facility

Sent: 9/18/2009 12:49 PM

was read on 9/18/2009 12:50 PM.

From:

Mitchell, Bruce

Sent:

Friday, September 18, 2009 1:48 PM

To:

Friday, Barbara

Subject:

RE: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II. Inc. , Lake County Resource Recovery Facility

9/18/09

Thanks, Barbara, for handling. Take care and have a great day and week-end!

Bruce

From: Friday, Barbara

Sent: Friday, September 18, 2009 12:49 PM

To: gmain@covantaenergy.com

Cc: jgorrie@CovantaEnergy.com; 'vta@covantaenergy.com'; Shine, Caroline; Gibson, Victoria; Mitchell, Bruce; Koerner,

Jeff

Subject: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV -

Covanta Lake II, Inc., Lake County Resource Recovery Facility

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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 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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

From:

System Administrator

To:

Livingston, Sylvia; Walker, Elizabeth (AIR)

Sent:

Friday, September 18, 2009 12:50 PM

Subject:

Delivered: FW: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery

Facility

Your message

To: Livingston, Sylvia; Walker, Elizabeth (AIR)

Subject: FW: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-

FL-113H) and 0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource

Recovery Facility

Sent: 9/18/2009 12:50 PM

was delivered to the following recipient(s):

Livingston, Sylvia on 9/18/2009 12:50 PM Walker, Elizabeth (AIR) on 9/18/2009 12:50 PM

From:

Livingston, Sylvia

To:

Friday, Barbara

Sent:

Friday, September 18, 2009 1:22 PM

Subject:

Read: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-FL-113H) and

0690046-009-AV - Covanta Lake II, Inc. , Lake County Resource Recovery Facility

Your message

To: Livingston, Sylvia; Walker, Elizabeth (AIR)

Subject: FW: Request for Additional Information - Project Nos. 0690046-008-AC(PSD-

FL-113H) and 0690046-009-AV - Covanta Lake II, Inc., Lake County Resource

Recovery Facility Sent: 9/18/2009 12:50 PM

was read on 9/18/2009 1:22 PM.