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DIVISION OF AIR
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Covanta Lake, Inc.
A Covanta Energy Company
3830 Rogers Industrial Park Road
Okahumpka, FL 34762
Tel 352 365 1611
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August 26, 2011

VIA EMAIL

Mr. Jeffery F. Koerner
Air Program Administrator
FDEP, Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: Covanta Lake II, Inc.
Lake County Resource Recovery Facility - ID No. 069-0046-010-AV
Comments on draft Title V Permit

Dear Mr. Koerner:

Thank you for providing Covanta Lake II, Inc. (Covanta) with the draft Title V renewal permit on August 12, 2011 via email. Covanta submits the comments below for the Department's consideration.

1. Section I. Subsection A.

- Facility Description on page 2 of 27: In the first sentence, please change the combustors' grate system from "horizontal" to "inclined". In the second sentence, please change "municipal solid waste monofils via truck or rail" to "municipal solid waste Class I landfill".
- Condition A.11 Nitrogen Oxides on page 12 of 27: Please add "Compliance determination is based on 24-hr daily block average".
- Condition A.13 Dioxin/Furan on page 12 of 27: Please add "Compliance determination is by stack tests".
- Condition A.23 Federal Requirements on page 13 of 27: Please add Appendix ZZZZ.
- Condition A.28 NSPS Startup, Shutdown and Malfunction Provisions on page 14 of 27: Please add paragraph "d. During a loss of boiler water level control or loss of combustion air control malfunction period as specified in 40CFR60.58b(a)(1)(iii), a diluents cap of 14% for oxygen or 5% for carbon dioxide may be used in the emissions calculations for sulfur dioxide and nitrogen oxides".

- Condition A.30.b Activated Carbon Injection on page 15 of 27: Please add a clarification to paragraph b to specify that compliance determination is based on 8-hr block average.
- Condition A.34.f CEMS Operation on page 17 of 27: Please delete the sentence stating “A carbon monoxide value of 400 ppmvd shall indicate good combustion”.
- Condition A.35 Test Methods on page 17 of 27: Please add Method 22 for Fugitive ash emissions.
- Condition A.39 Reporting Schedule on page 18 of 27: Please delete MSW Charging Rate Monitoring and Segregated Solid Waste Record Keeping from the Table. The underlying conditions require that the documents be prepared and maintained – there is no requirement for submittal of a Report to the Compliance Authority. Please add semi-annual and annual NSPS Subpart Cb reports to the table.
- Condition A.46.a Other Operating and Training Requirements on page 20 of 27: Please add a clarification as to the duration of the absents as follow:

When the certified chief facility operator (CFO) and certified shift supervisor (SS) are both off-site for 12 hours or less, and no other certified operator is on-site, the provisionally certified control room operator (CRO) may perform the duties of the certified CFO or certified SS. [40 CFR 60.54b(c)(2)(i)]

When the certified CFO and certified SS are off-site for more than 12 hours, but for two weeks or less, and no other certified operator is on-site, the provisionally certified CRO may perform the duties of the certified CFO or certified SS without notice to, or approval by the administrator. However, the owner or operator of the affected facility must record the period when the certified CFO or certified SS are off site and include that information in the annual report as specified under 40 CFR 60.59b(g)(5). [40 CFR 60.54b(c)(2)(ii)]

When the certified CFO and certified SS are off site for more than 2 weeks, and no other certified operator is on-site, the provisionally certified CRO may perform the duties of the certified CFO or certified SS without approval by the Administrator. However, the owner or operator must take two actions:

- a. Notify the Administrator in writing ...; and*
- b. Submit a status report and corrective action summary every 4 weeks following the initial notification.... [40 CFR 60.54b(c)(2)(iii)].*

Mr. Jeffery Koerner

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- Condition A.46.b Other Operating and Training Requirements on page 20 of 27: Please add a clarification for newly promoted operator and transferred personnel as follows:

A provisionally certified operator who is newly promoted or recently transferred to a shift supervisor position or a chief facility operator position at the municipal waste combustion unit may perform the duties of the certified chief facility operator or certified shift supervisor without notice to, or approval by, the Administrator for up to six months before taking the ASME QRO certification exam.

2. Section VI. Appendices

- Appendix NSPS Eb. The attached version dated 11/21/03 does not contain Federal revisions of 5/10/06 so it should be replaced with version dated 4/21/08 or later.

If additional information is needed, please do not hesitate to contact Viet Q. Ta, Facility Environmental Engineer at (727) 919-7671.

Sincerely,



Gary Main
Facility Manager
Covanta Lake II, Inc.

Copy: B. Crispell
V. Ta
J. Gorrie