



# Florida Department of Environmental Protection

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November 2, 2012

*Sent via Electronic Mail - Read Receipt Requested*  
[gmain@covantaenergy.com](mailto:gmain@covantaenergy.com)

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

Re: **Second Request for Additional Information**  
Project Nos. 0690046-013-AV, 0690046-014-AC  
Lake County Resource Recovery Facility  
Applications for Fuel Slate Changes and Title V Revision

Dear Mr. Main:

On October 23, 2012 Covanta Lake II submitted a response to our request for additional information (RAI) dated August 15, 2012. The applications are to increase acceptance and processing of non-hazardous solid and liquid wastes and to revise the facility Title V air operation permit to reflect the requested changes as well as the recently approved injection of leachate into the scrubbers.

The application is still incomplete. The response to our first question states: *“Unfortunately the projected ‘future actual emissions’ are difficult, if not impossible, to predict”*.

Following is the definition and procedure required by the applicable rule:

*“Projected Actual Emissions” means the maximum annual rate, in tons/year, at which an existing emissions unit is projected to emit a PSD pollutant in **any one** of the 5 years following the date the unit resumes regular operation after the project, or in **any one** of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that PSD pollutant and full utilization of the unit would result in a significant emissions increase or a significant net emissions increase at the major stationary source. One year is one 12-month period. In determining the projected actual emissions, the Department:*

- (a) Shall consider all relevant information, including historical operational data, the company's own representations, the company's expected business activity and the company's highest projections of business activity, the company's filings with the State or Federal regulatory authorities, and compliance plans or orders, including consent orders; and*
- (b) Shall include fugitive emissions to the extent quantifiable and emissions associated with startups and shutdowns; and*
- (c) Shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth; or*
- (d) In lieu of using the method set out in paragraphs (a) through (c) above, may be directed by the owner or operator to use the emissions unit's potential to emit, in tons per year.*

An example of the procedure used at a waste to energy facility is contained in the recent technical evaluation and preliminary determination conducted for the Pinellas County Resource Recovery Facility. The document may be accessed at: [Link to Pinellas Draft Permit Package](#) Refer to pages 11-12.

## REQUEST FOR ADDITIONAL INFORMATION

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As provided in paragraph (d) above, the owner or operator may direct the Department to use the emissions unit's potential to emit (PTE) in tons per year. Table 1 of your RAI response contains a column labeled "Annual Not-to-Exceed Emissions". Please advise whether Covanta Lake II is requesting to include these values as 12-month limits in the requested permit as the PTE for each pollutants in lieu of the methodology described in paragraphs (a) through (c) above.

We discussed with Mr. Jason Gorrie the possibility of providing some past stack test results from the Covanta Tulsa and Huntsville facilities while receiving fuel slates and look forward to receiving that information.

The Department will resume processing the application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. 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 responsible official (R.O.). Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within **ninety (90)** days or provide a written request for an additional period of time to submit the information.

If you should have any questions, please contact Scott Sheplak, by telephone at (850) 717-9074 or by e-mail at [scott.sheplak@dep.state.fl.us](mailto:scott.sheplak@dep.state.fl.us).

Sincerely,  
(*Electronic Signature*)

Jeffery F. Koerner, Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

JFK/aal

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

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