



Covanta Projects, Inc.
A Covanta Energy Company
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RECEIVED

SEP 29 2006

September 27, 2006

BUREAU OF AIR REGULATION

Mr. Bruce Mitchell
Air Permit Engineer
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. 069-0046-006-AV
Comments on draft Title V Permit

Dear Mr. Mitchell:

Thank you for providing Covanta Lake II, Inc. (Covanta) with a very good draft Title V renewal permit which is proactive by incorporating the latest revisions made to EPA 40CFR60, Subparts Cb and Eb.

It is Covanta's opinion that the comments below are minor and the resulting changes are not considered a significant change to the draft Title V permit.

1. Section II. Facility-wide Conditions: Condition 3 is utilized twice in a row, requiring the re-numbering of subsequent conditions.
2. Page 7, second paragraph: The phrase "to be" should be deleted as the carbon system is operational.
3. Condition A.29: The averaging period for HCl is the average of 3 runs in conformance and is not necessary to be defined here because Condition A.49(5) specifies compliance determination from 3 test runs.
4. Condition A.46(1)(vii): The phrase "no more" should be replaced with "no less" to reflect the intent of the 9 to 15 month testing window.
5. Condition A.49(7): Covanta requests the 9 to 15 month testing window be allowed.
6. Condition A.50(5)(iii): There are four (4) instances where the standard for reduced testing "7 nanograms" should be revised and remain as "15 nanograms" since the units are regulated under 60.38b(b).
7. Condition A.51(6): The value "9095" should be replaced with "95".
8. Condition A.52(4): Covanta requests the 9 to 15 month testing window be allowed.
9. Condition A.80(14): Duplicate language should be deleted.
10. Condition A.88: Due to the definition of excess emissions in Condition A.89 and the fact that Covanta conducts testing of PM, HCl, multi-metals, dioxin/furan annually, Covanta

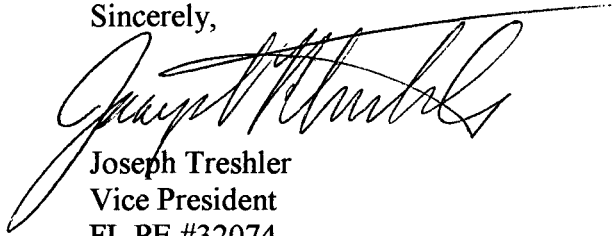
requests clarification that the quarterly report required by condition A.88 covers CEMS and COMS.

11. There appears to be stray subsection letters at the beginning of A.79, A.80, A.81 and A.82

In addition to the above, Covanta wishes to solicit your opinion regarding the necessity to include a clarification in the permit to the effect that the facility is allowed to feed internally generated hazardous waste subject to the exemption in 62-730.270(3), FAC as allowed under 40CFR sections 261.5(f) and (g), and sections 266.100(c)(3).

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

Sincerely,



Joseph Treshler
Vice President
FL PE #32074

Copy: Gary Main
Viet Q. Ta
Leon Brasowski



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