



# Florida Department of Environmental Protection

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Herschel T. Vinyard Jr.  
Secretary

August 15, 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: **Request for Additional Information**  
Project Nos. 0690046-012-AC, 0690046-013-AV, 0690046-014-AC  
Lake County Resource Recovery Facility  
Applications for Permanent Leachate Use and Fuel Slate Changes

Dear Mr. Main:

On July 13, 2012, Covanta Lake II submitted an application for a permanent leachate injection air construction permit and a revision to Title V air operation permit conditions regarding the acceptance and processing of non-hazardous solid and liquid waste for the existing Lake County Resource Recovery Facility.

On August 9, 2012, Department representatives met with Jason Gorrie and Ryder Rudd of Covanta to discuss the requested changes. We reached agreement on the additional information needed to process the requests.

The application is complete with respect to the permanent injection of leachate and we will send a draft air construction permit shortly under separate cover. That action will be taken as Project No. 0690046-012-AC.

The application is incomplete with respect to the requested changes in the fuel slate. That request has been designated as an air construction permit application (Project No. 0690046-014-AC) because the present fuel slate was limited in a previous construction permit (Project No. 0690046-003-AC). The Title V Air Operation Permit will be revised as Project No. 0690046-013-AV concurrently with the fuel slate changes and will also incorporate the leachate project.

In order to continue processing the fuel slate and Title V Revision applications, the Department needs the additional information requested below. Should a response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

1. For major stationary sources such as Lake County Resource Recovery Facility, PSD applicability for modification projects is based on thresholds known as the significant emission rates (SER) as defined in Rule 62-210.200, F.A.C. Any "net emissions increase" as defined in Rule 62-210.200, F.A.C. of a PSD pollutant from the project that equals or exceeds the respective SER is considered "significant." Please provide the baseline actual emissions and projected actual emissions and determine the increase (if any) due to the expanded fuel slate.  
[Rules 62-4.070, 62-210.200, 62-212.300 and 62-, F.A.C.]

## REQUEST FOR ADDITIONAL INFORMATION

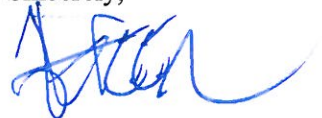
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2. Please advise regarding the capability of the units to accept increased level of segregated non-hazardous solid and liquid waste in lieu of conventional municipal solid waste. [Rule 62-4.070, F.A.C.]
3. Please provide your planned operating procedures for the acceptance and processing of non-hazardous solid and liquid waste. These may be similar to the procedures implemented at the Covanta Tulsa facility.
4. Please advise of a reasonable upper limit for segregated waste considering the design of the two units.

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. 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, feel free to contact Yousry (Joe) Attalla, by telephone at (850) 717-9078 or by e-mail at [yousry.attalla@dep.state.fl.us](mailto:yousry.attalla@dep.state.fl.us).

Sincerely,



Justin Green, Environmental Administrator  
Office of Permitting & Compliance  
Chemicals & Combustion Key Industry Group  
(850) 717-9024

JG/yha

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

Mr. Gary Main, Covanta Lake II, Inc.: [gmain@covantaenergy.com](mailto:gmain@covantaenergy.com)  
Mr. Jason Gorrie, P.E., Covanta Energy: [jgorrie@covantaenergy.com](mailto:jgorrie@covantaenergy.com)  
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