

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Braintree MA		Facility: Braintree Transfer Station				
3/4/2002	Solid Waste Permit	Mass. DEP	Notice of Noncompliance	A Notice of Noncompliance was issued alleging MADEP personnel observed Facility personnel transferring white goods for disposal in violation of 310 CMR 19.017(3) and 310 CMR 19.017(7).	The facility has requested a rescision of the NON via letters dated April 10 and April 22, 2002 based on the fact the facility believes the actions witnessed are not a violation of 310 CMR 19.017 which allows for "de minimus" quantities.	\$0.00

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Location: Carver MA		Facility: CMW Landfill				
9/11/1998	Solid Waste Permit/Cell IVA ATO	Massachusetts DEP	Administrative Consent Order	The Department alleged various violations of 310 CMR 19.000 et. al. resulting from an unusually heavy rainfall event.	Section IV contains a compliance schedule with various corrective actions to be completed. A fine of \$1,000/day that an activity went beyond its deadline was stipulated. All items were completed within the specified time period. No penalty was assessed.	\$0.00

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Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Chester PA		Facility: Covanta Delaware Valley, L.P.				
9/3/1997	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	On August 10 & 11, 1997, Condition 5(E)(2) - Malodor beyond the property line. On August 11, 1997, Condition 5(E)(4) - Fugitive emissions observed from feed chute building. On August 2, 5, & 10, 1997, Condition 6(D)(3)(b) - Tipping floor doors open at unauthorized times.	In response to PADEP's request for an abatement plan the facility submitted an abatement plan to the Department on September 23, 1997. The facility has requested a written confirmation from PADEP that compliance has been achieved.	\$0.00
12/9/1997	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	During the 2nd Quarter of 1997, the facility experienced CEM exceedances and data availability violations.	Ref-Fuel has paid the fine requested.	\$12,400.00
2/2/1998	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	During the 3rd Quarter of 1997, the facility experienced CEM exceedances and data availability violations.	The Department assessed Ref-Fuel \$46,592. Ref-Fuel and the Department agreed that the fine should be \$42,592. Ref-Fuel has paid the fine.	\$42,592.00
4/14/1998	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	During the 4th Quarter of 1997, the facility experienced CEM exceedances and data availability violations.	Ref-Fuel has paid the fine requested.	\$21,870.00
4/23/1998	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Administrative Letter	The facility did not complete an Opacity RATA during 1997, as required by the compliance assurance document.	The Department had requested an \$115,200 fine from the facility. Subsequently, the Department sent a letter to Ref-Fuel on 7/17/98 indicating that they would exercise enforcement discretion and waive the penalty.	\$0.00

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4/24/1998	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	The facility exceeded its permitted particulate levels on Units #2 and #4 during the December 1997 stack test.	The Department requested a fine of \$60,900. Ref-Fuel and the Department agreed that the fine should be \$45,000. The fine was paid on 2/23/00, and an abatement plan was submitted to resolve this matter.	\$45,000.00
4/30/1998	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	The facility exceeded its permitted waste acceptance limit of 4350 tons per day by 6 tons.	An abatement plan was submitted to the Department on 5/13/98 to resolve this matter.	\$0.00
12/8/1998	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	Alleges that facility had fugitive dust emanating from the top of the lime silo while silo was being filled.	An abatement plan was submitted to the Department on 12/16/99 to resolve this matter.	\$0.00
10/22/1999	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Consent Assessment of Civil Penalty	The facility entered into an agreement with the Department to settle 1998 CEMS exceedances and availability issues.	A penalty of \$27,718 was paid by the facility.	\$27,718.00
11/3/1999	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	Alleges that excess quantities of facility ash are being transported along with the recovered metals to a ferrous processor.	The facility requested a rescission of the notice of violation. The minimization of fugitive emissions from the ferrous processor is a duty that is placed upon the operator of the site accepting the ferrous materials. Ref-Fuel takes steps to minimize the amount of ash on the ferrous materials by using magnetic loading.	\$0.00

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11/17/1999	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	During an inspection of the facility Department personnel noted there may have been some fugitive emissions from the facility's roof vents on 11/17/99. Subsequently, the Department issued a formal notice of violation from the event.	A meeting was held with the Department on 12/6/99 to resolve this matter. Ref-Fuel agreed at the meeting to make certain operational adjustments to minimize the reoccurrence of this event. The Department has assessed a fine of \$2,750 for this event. In order to resolve this and other similar violations outstanding, Ref-Fuel met with the Department on Nov. 16, 2001 and is in the process of finalizing a consent order with a stipulated penalty. PADEP agreed to reduce the penalty to \$2,500 and Ref-Fuel signed a consent order settling the events of 11/17/99, 9/6/2000, 9/21/2000, and 3/5/2001. Ref-Fuel received an executed consent order from PADEP and on August 13, 2002 transferred \$48,226 to Crozer Medical Center as part of the CEP. The penalty assessed for this incident was included in the money transferred.	\$2,500.00
9/6/2000	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	Alleges that the facility had fugitive emissions during compliance inspections on 7/11/00 and 7/31/00.	The facility submitted an abatement plan on 9/27/00. The Department has assessed a fine of \$2,970 for the 7/11/00 event and \$3,190 for the 7/31/00 event. In order to resolve this and other similar violations outstanding, Ref-Fuel met with the Department on Nov. 16, 2001. PADEP agreed to reduce the penalties to \$2,970 and \$2,900 respectively. Ref-Fuel signed a consent order settling the events of 11/17/99, 9/6/2000, 9/21/2000, and 3/5/2001. Ref-Fuel received an executed consent order from PADEP and on August 13, 2002 transferred \$48,226 to Crozer Medical Center as part of the CEP. The penalty assessed for this incident was included in the money transferred.	\$5,870.00

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9/21/2000	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	Alleges that the facility had fugitive emissions during a compliance inspection on 9/14/00.	The facility submitted an abatement plan on 10/11/00. The Department has assessed a fine of \$3,300 for this event. Ref-Fuel met with the Department on Nov. 16, 2001. PADEP agreed to reduce the penalty to \$3,000 and Ref-Fuel signed a consent order settling the events of 11/17/99, 9/6/2000, 9/21/2000, and 3/5/2001. Ref-Fuel received an executed consent order from PADEP and on August 13, 2002 transferred \$48,226 to Crozer Medical Center as part of the CEP. The penalty assessed for this incident was included in the money transferred.	\$3,000.00
2/23/2001	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Consent Order and Agreement	The facility entered into an agreement with the Department to settle 1999 CEMS exceedances and availability issues. As per the agreement, the fines are applied to the Community Environmental Project for asthma management run by the Crozier-Chester Medical Center.	The consent order was signed in February 2001 and a payment of \$59,502 was paid into an interest bearing account on 3/6/01. At the discretion of the PADEP, the funds were transferred to Crozier Medical Center on 7/12/01.	\$59,502.00

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3/5/2001	PADEP Operating Permit OP-23-0004	Pensylvania DEP	Notice of Violation	Alleges that the facility had fugitive emissions during a compliance inspection on 2/20/01.	The facility submitted an abatement plan on 3/20/01. The Department has assessed a fine of \$3,300 for this event. In order to resolve this and other similar violations outstanding, Ref-Fuel met with the Department on Nov. 16, 2001. PADEP agreed to reduce the penalty to \$3,000 and Ref-Fuel signed a consent order settling the events of 11/17/99, 9/6/2000, 9/21/2000, and 3/5/2001. Ref-Fuel received an executed consent order from PADEP and on August 13, 2002 transferred \$48,226 to Crozer Medical Center as part of the CEP. The penalty assessed for this incident was included in the money transferred.	\$3,000.00
7/26/2001	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Consent Order and Agreement	The facility entered into an agreement with the Department to settle 2000 CEMS exceedances and availability issues. As per the agreement, the fines are applied to the Community Environmental Project for asthma management run by the Crozier-Chester Medical Center.	The consent order was signed in July 2001 and a payment of \$37,856 was paid into an interest bearing account on 5/24/01. At the discretion of the PADEP, the funds were transferred to Crozier Medical Center on 10/10/01.	\$37,856.00
7/29/2002	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Consent Order and Agreement	The facility entered into an agreement with the Department to settle 2001 CEMS exceedances and availability issues. As per the agreement, the fines are applied to the Community Environmental Project for asthma management run by the Crozier-Chester Medical Center.	The consent order was signed in July 2002. A penalty of \$34,126 was assessed. Ref-Fuel received an executed consent order from PADEP and on August 13, 2002 transferred \$48,226 to Crozier Medical Center as part of the CEP. The penalty assessed for this incident was included in the money transferred.	\$34,126.00

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8/21/2002	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the second quarter 2002 totaling \$18,642.	The consent order was signed June 12, 2003 and a payment of \$37,150 for Quarters 1 through 3 was paid. As per agreements with the PADEP, the funds will be transferred to Crozier Medical Center.	\$18,642.00
8/27/2002	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the first quarter 2002 totaling \$11,811.	The consent order was signed June 12, 2003 and a payment of \$37,150 for Quarters 1 through 3 was paid. As per agreements with the PADEP, the funds will be transferred to Crozier Medical Center.	\$11,811.00
1/9/2003	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the third quarter 2002 totalling \$6,697.	The consent order was signed June 12, 2003 and a payment of \$37,150 for Quarters 1 through 3 was paid. As per agreements with the PADEP, the funds will be transferred to Crozier Medical Center.	\$6,697.00

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10/23/2003	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for unit 1 only for third quarter 2003 totalling \$1236. These fines were assessed separately due to the Department's approval of the facility's Phase I plan for thereplacement of the opacity monitor.	The facility met with PADEP in May 2003 to discuss this fine prior to it being assessed. The Department stated that upon the facility being assesed the fine, they would entertain arguments for reductions from the facility based on SO2/HCl surrogacy data and an accelerated plan to replace CEMS with low availability. On May 3, 2004 the facility submitted a letter requesting a mitigation of the CEMS Fines for the fourth quarter of 2002 through the third quarter 2003. The basis of a fine reduction is that SO2 monitoring performed during the periods of HCl downtime provide a surrogate measurement for HCl. The Department in a letter dated May 20, 2004 denied the request, however the facility met with the Department in July 2004 to discuss further. Subsequently the facility has reached an agreement with the Department to pay the fines and is working to finalize the written agreement. The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064for 3Q 2002 though 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$1,236.00

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11/12/2003	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the third quarter 2003 totalling \$10,224.	The facility met with PADEP in May 2003 to discuss this fine prior to it being assessed. The Department stated that upon the facility being assessed the fine, they would entertain arguments for reductions from the facility based on SO2/HCl surrogacy data and an accelerated plan to replace CEMS with low availability. On May 3, 2004 the facility submitted a letter requesting a mitigation of the CEMS Fines for the fourth quarter of 2002 through the third quarter 2003. The basis of a fine reduction is that SO2 monitoring performed during the periods of HCl downtime provide a surrogate measurement for HCl. The Department in a letter dated May 20, 2004 denied the request, however the facility met with the Department in July 2004 to discuss further. Subsequently the facility has reached an agreement with the Department to pay the fines and is working to finalize the written agreement. The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 through 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$10,223.00

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12/31/2003	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the first quarter 2003 totalling \$51,725.	The facility met with PADEP in May 2003 to discuss this fine prior to it being assessed. The Department stated that upon the facility being assessed the fine, they would entertain arguments for reductions from the facility based on SO2/HCl surrogacy data and an accelerated plan to replace CEMS with low availability. On May 3, 2004 the facility submitted a letter requesting a mitigation of the CEMS Fines for the fourth quarter of 2002 through the third quarter 2003. The basis of a fine reduction is that SO2 monitoring performed during the periods of HCl downtime provide a surrogate measurement for HCl. The Department in a letter dated May 20, 2004 denied the request, however the facility met with the Department in July 2004 to discuss further. Subsequently the facility has reached an agreement with the Department to pay the fines and is working to finalize the written agreement. The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 though 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$115,951.00

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12/31/2003	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the fourth quarter 2002 totalling \$115,951.	The facility met with PADEP in May 2003 to discuss this fine prior to it being assessed. The Department stated that upon the facility being assessed the fine, they would entertain arguments for reductions from the facility based on SO2/HCl surrogacy data and an accelerated plan to replace CEMS with low availability. On May 3, 2004 the facility submitted a letter requesting a mitigation of the CEMS Fines for the fourth quarter of 2002 through the third quarter 2003. The basis of a fine reduction is that SO2 monitoring performed during the periods of HCl downtime provide a surrogate measurement for HCl. The Department in a letter dated May 20, 2004 denied the request, however the facility met with the Department in July 2004 to discuss further. Subsequently the facility has reached an agreement with the Department to pay the fines and is working to finalize the written agreement. The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 though 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$51,725.00

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1/6/2004	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the second quarter 2003 totalling \$40,793.	The facility met with PADEP in May 2003 to discuss this fine prior to it being assessed. The Department stated that upon the facility being assessed the fine, they would entertain arguments for reductions from the facility based on SO2/HCl surrogacy data and an accelerated plan to replace CEMS with low availability. On May 3, 2004 the facility submitted a letter requesting a mitigation of the CEMS Fines for the fourth quarter of 2002 through the third quarter 2003. The basis of a fine reduction is that SO2 monitoring performed during the periods of HCl downtime provide a surrogate measurement for HCl. The Department in a letter dated May 20, 2004 denied the request, however the facility met with the Department in July 2004 to discuss further. Subsequently the facility has reached an agreement with the Department to pay the fines and is working to finalize the written agreement. The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 through 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$40,793.00

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2/13/2004	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for part of the fourth quarter 2003 totalling \$1,420. Remaining fines will be assessed once the certification of the newly installed monitors is approved.	The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 through 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$1,420.00
5/7/2004	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the first quarter 2004 totalling \$5,610. Remaining fines will be assessed once the certification of the newly installed monitors is approved.	The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 through 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$5,610.00
8/16/2004	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the second quarter 2004 totalling \$1,400. Remaining fines will be assessed once the certification of the newly installed monitors is approved.	The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 through 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$1,400.00
11/19/2004	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the third quarter 2004 totalling \$2,705. Remaining fines will be assessed once the certification of the newly installed monitors is approved.	The consent order was signed on April 4, 2005 for a total fine assessed in the amount of \$231,064 for 3Q 2002 through 3Q 2004. The facility transferred \$100,000 of the assessment to Crozer medical Center as an approved CEP. The facility paid \$131,604 directly to the Department as settlement for the remainder of the fine in assessment.	\$2,705.00

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3/14/2005	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for CEMS Exceedences and Availability for the fourth quarter 2004 totalling \$2,623. Remaining fines will be assessed once the certification of the newly installed monitors is approved.	As has been past practice, these fines will be accumulated for multiple quarters and once all quarters for the year are assessed they will be settled in a consent order. The facility will be requesting that these fines be applied to an acceptable CEP.	\$0.00
3/16/2005	PADEP Storage Tank Facility #23-44947	Pennsylvania DEP	Notice of Non-compliance	Two in-service above ground storage tanks greater than 5,000 gallons were required to be inspected by October 2003. No fine or penalty was assessed.	The facility had a certified tank inspector inspect the tanks on May 19, 2005 and is awaiting the final report. The certified tank inspector had the inspection schedule and report submittal schedule approved by PADEP.	\$0.00
6/6/2005	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for the first quarter of 2005 totalling \$1,908. Remaining fines will be assessed once the certification of the recently installed monitors is approved.	The facility is awaiting certification of its inlet O2, opacity, and outlet analyzers. At that time the facility will submit the remainder of the first quarter 2005 report.	\$1,908.00
9/2/2005	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for the second quarter of 2005 totalling \$615. Remaining fines will be assessed once the certification of the recently installed monitors is approved.	The facility is awaiting certification of its inlet O2, opacity, and outlet analyzers. At that time the facility will submit the remainder of the second quarter 2005 report.	\$1,908.00
1/4/2006	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for the third quarter of 2005 totalling \$0. Remaining fines will be assessed once the certification of the recently installed monitors is approved.	The facility is awaiting certification of its inlet O2, opacity, and outlet analyzers. At that time the facility will submit the remainder of the third quarter 2005 report.	\$1,908.00

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3/24/2006	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for the fourth quarter of 2005 totalling \$0. Remaining fines will be assessed once the certification of the recently installed monitors is approved.	The facility is awaiting certification of its inlet O2, opacity, and outlet analyzers. At that time the facility will submit the remainder of the fourth quarter 2005 report.	\$1,908.00
5/24/2006	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Penalty Assessment	The facility received a Notice of Penalty Assessment for the first quarter of 2006 totalling \$1404. Remaining fines will be assessed once the certification of the recently installed monitors is approved.	The facility is awaiting certification of its inlet O2, opacity, and outlet analyzers. At that time the facility will submit the remainder of the first quarter 2006 report.	\$1,404.00
7/27/2006	PADEP Operating Permit OP-23-0004	Pennsylvania DEP	Notice of Violation	The facility received a Notice of Violation for a nickel exceedance that occurred in May 2005 during stack testing.	On 8/23/2006 submitted its response to the Department stating that the facility re-tested unit #1 for nickel in July 2005 and was well below its nickel limit. During testing in November 2005 and May 2006 tested unit #1 again for nickel and the facility was well below its nickel limit for both tests.	\$0.00

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Location: Chester, PA		Facility: ARC Waste LLC				
12/3/2002		Pennsylvania DEP	Consent Assessment of Civil Penalty	The Department Alleges that on October 22, 2002 an ARC Waste vehicle was witnessed allowing waste to leak onto the ground in violation of 25 PA Code 285.13(c) and is requesting a \$1,000 penalty.	American Ref-Fuel negotiated a reduced fine of \$750. The consent assessment was fully executed on 1/30/03 and the \$750 fine paid to the Department.	\$750.00

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Location: Lynn MA

Facility: Lynn Transfer Station

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
5/28/2004	MADEP Solid Waste Operating Permit	Mass. DEP	Notice of Noncompliance	Based upon a brief, DEP inspection of the facility conducted on April 28, 2004, a Notice of Noncompliance (NON) was issued alleging concerns regarding the knowledge and training of the controlling individual at the Station at the time of the inspection, and the completion of comprehensive waste load inspections for DEP waste-banned materials.	<p>TransRiver Marketing/American Ref-Fuel responded via letter on June 10, 2004 stating that the NON should be retracted. In the response letter it was noted that the required number of comprehensive DEP waste ban inspections (ten per month) were completed in accordance with the DEP-approved Waste Ban Plan during both April and May 2004, the relevant time periods of the inspection/NON. In addition, the letter noted the ongoing, supervisory training of Station Operators and the degree of additional supervisory support provided. The letter further emphasized that the DEP's one, brief inspection was not representative of the larger picture from many Department inspections during the past several years which demonstrated operational compliance with solid waste requirements. On 11/23/2004 the MADEP issued a return to compliance letter to the facility.</p> <p>We have implemented several actions to reinforce ongoing, operational practices including: a) refresher training on solid waste requirements, b) additional supervisory oversight/support, and c) continued comprehensive inspections. As of this date, the DEP has not responded in writing and a follow-up DEP inspection has not yet occurred at the facility. However, we believe that their concerns have been addressed and that further enforcement action will be unnecessary.</p>	\$0.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Newark NJ		Facility: Essex County Resource Recovery Facility				
11/30/1990	Air PermiUS101A, B, C	New Jersey DEP	Administrative Consent Order	The air permits for the Newark facility contained a limit on nitrogen oxide emissions of 95 pounds per hour per unit. As it became apparent that the facility would be unable to attain the limit, Ref-Fuel approached NJDEP for a resolution. The agreed upon resolution was the ACO which provided for operation of the facility while Ref-Fuel designed and constructed a Thermal DeNOx System to control Nox emissions from the facility including a compliance schedule of activities and an administrative penalty if the stack emissions tests indicated that the uncontrolled Nox emissions would exceed 95 pounds per hour, as well as penalties for delays not due to force majeure in the installation and startup of the NOx control equipment. An administrative penalty of \$200,000 was paid. This penalty assessment was in lieu of all other enforcement action by the DEP.	NOx reduction system was installed and is operating.	\$200,000.00
1/30/1991	Air PermiUS101A, B, C	New Jersey DEP	Administrative Order and Notices of Civil Administrative Penalty Assessments	Alleged exceedances of permit limitations based on continuous emissions monitoring.	Matter settled with Mercury/CEMS ACO dated January 11, 1994.	\$0.00

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3/1/1991 7/26/91	Solid Waste Permit / 071424	New Jersey DEP	Notice of Violation	Condition 28 - Housekeeping	The facility took steps to correct.	\$0.00
3/5/1991	NPDES StormwaterPermit/ 0055247	New Jersey DEP	Notice of Violation	Alleges the facility exceeded its NPDES limits and operated treatment works without approval for connection to the Passaic Valley Sewer Commission system, oil/water separator and one unpermitted source	Approvals for the sewer connection and oil/water separators were granted on 3/15/91, unpermitted sources have been approved.	\$0.00
10/30/1991 1/10/92, 5/12/92, 6/1/92, 6/10/92, 7/27/92, 12/92, 12/14/92, 1/4/93, 4/9/93, 6/23/93, 7/19/93, 8/6/93, 9/3/93, 9/30/93, 11/10/93, 11/17/93, 11/30/93, 1/26/94, 5/26/94	NPDES StormwaterPermit/ 0055247	New Jersey DEP	Notice of Violation and resulting Administrative Consent Order	Stormwater outfall exceedances of discharge limits	Entered into ACO requiring investigation into exact causes of exceedances and corrective actions. Human waste from the trash was determined to be the cause of the exceedances. ACO terminated by NJDEPE on 11/8/96 due to compliance. \$487,000 fine.	\$487,000.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
11/15/1991	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order and Notices of Civil Administrative Penalty Assessments	Allegations of mercury emissions violations and NOX, SO2, opacity and O2 exceedances of permit limitations based on Continuous Emissions Monitoring.	On January 11, 1994, Ref-Fuel entered into a combined CEMS/Mercury Administrative Consent Order with NJDEP regarding alleged violations of certain air permit requirements. Ref-Fuel agreed to pay a monetary sanction of \$212,600 in full settlement of all outstanding and pending Notices of Civil Administrative Penalty Assessments, including alleged emissions excursions for the period of July 1, 1991 through June 30, 1993. Since July 1, 1993, NJDEP has assessed and Ref-Fuel has paid an additional \$34,200 in fines. The ACO settled all prior alleged CEMS and mercury violations and required actions to ensure facility will maintain compliance with mercury and CEMS permit conditions. During ACO negotiations, NJDEP promulgated a general standard for control of mercury emissions from all municipal waste combustors. Ref-Fuel installed and is operating a carbon injection system in order to comply with the new limits on mercury emissions. \$246,000 fine.	\$246,800.00
12/5/1991 1/2/92, 12/17/93	Solid Waste Permit / 071424	New Jersey DEP	Notice of Violation	Condition 28 - Housekeeping. Accumulation of ash on floor and ash equipment	The facility responded to NJDEP outlining modifications of the ash and ferrous systems. Ref- Fuel agreed to a less subjective standard but with automatic \$500 fines.	\$9,000.00
1/8/1992	Solid Waste Permit / 071424	New Jersey DEP	Notice of Violation	Condition 25 - exceedance of alleged capacity to store and process waste, based upon an accumulation of refuse on the tipping bay	Ref-Fuel responded to the allegations in a letter dated 1/22/92, identifying steps being taken to address the situation. This particular incident was the result of circumstances beyond Ref-Fuel's control. No violations of this permit condition have occur	\$0.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
2/21/1992	Air Permit/S101A, B, C	Superior Court of NJ	Injunction	None	NJDEP enjoined from issuing SO2 NOV's caused by gypsum wallboard NJDEP ordered delivered to Ref-Fuel's facility.	\$0.00
3/16/1993	Solid Waste Permit / 071424	New Jersey DEP	Notice of Violation	Condition 28 - Housekeeping - 3/5/93- 3/16/93	On 3/31/93 Ref-Fuel responded explaining the extenuating circumstances and described clean-up programs being implemented.	\$0.00
5/28/1993	NPDES StormwaterPermit/ 0055247	New Jersey DEP	Notice of Violation	Use of an uncertified laboratory to analyze fecal coliform	On 6/2/93 Ref-Fuel notified NJDEP that Woodward Clyde had erroneously represented that Terra Bio Chem was certified, and requested that the NOV be retracted due to the misrepresentation by Woodward Clyde. Ref-Fuel switched to another laboratory.	\$0.00
12/17/1993	Solid Waste Permit / 071424	New Jersey DEP	Notice of Violation	Condition 28 - Housekeeping. Accumulation of excess ash in the ferrous recovery area and under conveyors.	Ref-Fuel responded on 12/30/93 outlining steps being taken to correct the conditions.	\$0.00
1/11/1994	Solid Waste Permit / 071424	New Jersey DEP	Permit Modification	None	Ref-Fuel and NJDEP agreed to modify the wording of Permit Condition 28 to make objective the standard of compliance. Since the language modification agreement, there have been no additional allegations regarding this permit condition.	\$0.00
4/10/1996	Air Permit/S101A, B, C	New Jersey DEP	Notice of Violation	Failure to submit to the Department the annual emission fee and supplemental surcharge fee for fiscal year 1996 by January 31, 1996, extended to February 29, 1996	The payment was submitted to the Department on April 17, 1996.	\$0.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
8/14/1997	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order and Notices of Civil Administrative Penalty Assessments	Alleges operation of boiler #3 on April 30, 1996 with mercury controls, in violation of N.J.A.C. 7:27-8.3(e).	The facility met with the NJDEP and negotiated a settlement payment of \$3,000 for the carbon system malfunction event.	\$3,000.00
9/10/1997	NJDEP-Community Right to Know	New Jersey DEP	Notice of Violation	Alleges failure to submit an annual report, pursuant to N.J.S.A. 7:1G-3.1(a) and 5.1(a).	The facility is contesting the NOV, on the basis that the report was submitted. An additional copy of report has been submitted to the NJDEP along with a request to remove the NOV from our record.	\$0.00
2/27/1998	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	Alleges facility exceeded the Hydrogen Chloride emission standard stated in the permit.	Ref-Fuel reponded to the alleged facility exceedance by proving that this limitation was not in effect at the time of testing. An adjudicatory hearing request was filed by Ref-Fuel on 3/18/98 contesting a \$6,000 fine. American Ref-Fuel withdrew its request for a hearing and entered into a Consent Order of Settlement on 8/15/01. No liability was assigned in the Order, and a \$4,500 fine was paid.	\$4,500.00
1/12/1999	Solid Waste Permit/07124	New Jersey DEP	Notice of Violation	Failure to comply with NJAC 7:26- 2.11(b)11 - rejected load containing hazardous waste returned to generator.	A response letter was submitted on 2/2/99, noting the corrective actions taken and asking that the Department consider alternatives to the permit condition. Permit condition modification being requested in permit renewal submitted 7/00.	\$0.00
2/16/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 1998.	A penalty of \$3,200 was requested. Ref-Fuel negotiated and paid a \$750 penalty to settle this matter.	\$750.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
5/6/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the first calendar quarter of 1999.	A \$1000 fine was requested and paid.	\$1,000.00
6/1/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 1996.	A fine of \$3,600 was requested. Ref-Fuel requested an adjudicatory hearing which was acknowledged by the Department on 7/20/99. Letter to DEP dated 7/7/00 sent requesting a settlement meeting. Settlement agreement #NEA010001 was signed on 4/17/01 assessing a penalty of \$3,060.	\$3,060.00
6/29/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 1996.	The facility requested an adjudicatory meeting. The Department responded on 8/6/99 that our request had been received and a meeting would be scheduled. The requested fine is \$800. Letter to DEP dated 7/7/00 sent requesting a settlement meeting. Settlement agreement #NEA010002 was signed on 4/17/01 assessing a penalty of \$680.	\$680.00
8/30/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the second calendar quarter of 1999.	A \$200 fine was requested and paid.	\$200.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
9/10/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the first calendar quarter of 1997.	A fine of \$3,200 was requested. Ref-Fuel requested an adjudicatory hearing which was acknowledged by the Department on 10/9/99. Letter to DEP dated 7/7/00 sent requesting a settlement meeting. Settlement agreement #NEA010003 was signed on 4/17/01 assessing a penalty of \$2,620.	\$2,620.00
9/30/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the second calendar quarter of 1997.	A \$200 fine was requested and paid.	\$200.00
10/5/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 1997.	A fine of \$800 was requested. Ref-Fuel requested an adjudicatory hearing which was acknowledged by the Department on 11/16/99. Letter to DEP dated 7/7/00 sent requesting a settlement meeting. Settlement agreement #NEA010005 was signed on 4/17/01 assessing a penalty of \$680.	\$680.00
11/1/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the PSD standards. Specifically, the Department alleges that the carbon system malfunction is a violation of the standard.	A fine of \$45,000 was requested. The ANOCAPA's dated 11/1/99, 1/8/02, and 3/11/02 have been settled for an overall fine of \$41,000 via an Administrative Consent Order dated 12/23/2002.	\$41,000.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
11/19/1999	Solid Waste Permit/071424	New Jersey DEP	Notice of Violation	Alleges a failure to comply with Condition 15(b) of the SWF permit. See NJAC 7:26-2.11(b)(11). On 11/4/99, Boiler #1 exceeded the 4-hour steam block average of 990.0 kbls/hr; steam block of 16:00-20:00 measured at 990.6 kbls/hr.	The facility responded to the notice and will be taking additional steps to prevent the reoccurrence of this violation.	\$0.00
12/2/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 1999.	A fine of \$4,200 was requested. Ref-Fuel paid a fine of \$2,200 to settle this matter.	\$2,200.00
12/2/1999	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the first calendar quarter of 1998.	A fine of \$1,200 was requested. Ref-Fuel requested an adjudicatory hearing which was acknowledged by the Department on 1/4/00. Settlement agreement #NEA010006 was signed on 4/17/01 assessing a penalty of \$1,020.	\$1,020.00
2/22/2000	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 1999.	A \$2,200 fine was requested and paid.	\$2,200.00
5/26/2000	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order from the third quarter of calendar year 1998 was received.	A \$1,000 penalty was requested and paid.	\$1,000.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
5/31/2000 6/12/00	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the first calendar quarter of 2000.	A fine of \$400 was requested and paid.	\$400.00
6/21/2000 6/23/00	Solid Waste Permit/071424	New Jersey DEP	Notice of Violation	Notice of violation issued for excess waste on the tipping floor of the facility. The facility was cited with violating permit conditions 15 and 18 of the Solid Waste Permit.	A response letter was sent on 7/13/00. No penalty has been assessed.	\$0.00
6/30/2000	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order from the third quarter of calendar year 1997 was received.	No penalty was assessed.	\$0.00
8/11/2000	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the second calendar quarter of 2000.	A fine of \$400 was requested and paid.	\$400.00
11/27/2000	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 2000.	A penalty of \$400 was requested and paid.	\$400.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
2/6/2001 2/9/01	Solid Waste Permit/071424	New Jersey DEP	Notice of Violation	Notice of violation issued for excess waste on the tipping floor of the facility. The facility was cited with violating permit condition 15 of the Solid Waste Permit.	A response letter was sent on 2/26/01. No penalty has been assessed.	\$0.00
2/15/2001	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 2000.	A penalty of \$400 was requested and paid.	\$400.00
8/31/2001	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the second calendar quarter of 2001.	A penalty of \$8,800 was requested and paid.	\$8,800.00
11/27/2001	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 2001.	A penalty of \$4,000 was requested and paid.	\$4,000.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
1/8/2002	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order of Revocation and Notice of Civil Administrative Penalty Assessment	An "Administrative Order of Revocation and Notice of Civil Administrative Penalty Assessment" was received from NJDEP for allegedly exceeding a mass emission rate of 0.053 lbs/hr on of mercury on Boiler #3 during the June, 2001 quarterly mercury emissions test.	A fine of \$10,000 was requested. The ANOCAPA's dated 11/1/99, 1/8/02, and 3/11/02 have been settled for an overall fine of \$41,000 via an Administrative Consent Order dated 12/23/2002.	\$0.00
2/1/2002	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continucus Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 2001.	A penalty of \$1,000 was requested and paid.	\$1,000.00
3/11/2002	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order of Revocation and Notice of Civil Administrative Penalty Assessment	An "Administrative Order of Revocation and Notice of Civil Administrative Penalty Assessment" was received from NJDEP for allegedly exceeding mercury emission rates set forth in NJAC 7:27-8.3(e) on unit #3 for 2001. A fine of \$20,000 was assessed.	A fine of \$20,000 was requested. The ANOCAPA's dated 11/1/99, 1/8/02, and 3/11/02 have been settled for an overall fine of \$41,000 via an Administrative Consent Order dated 12/23/2002.	

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
4/11/2002	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	This order supercedes the Order from 10/4/99. Assessment was issued by the Department for exceeding the regulatory three hour shutdown provision. The Department believes that the unit must be come off line during this period, and not that it is merely an exemption from regulatory limits during the three hours. A fine of \$15,000 was assessed.	RESCINDED. A fine of \$45,000 was originally requested, however, this ANOCAPA is rescinded via Administrative Consent Order dated 12/23/2002 settling ANOCAPA's dated 11/1/99, 1/8/02, and 3/11/02 for an overall fine of \$41,000.	\$0.00
5/6/2002	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the first calendar quarter of 2002.	A penalty of \$1,200 was requested and paid.	\$1,200.00
9/6/2002	Air Permit/S101 A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the second calendar quarter of 2002.	A penalty of \$2,400 was requested and paid.	\$2,400.00
11/15/2002	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 2002.	A penalty of \$400 was requested and paid.	\$400.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
2/10/2003	Air Permit/S101A, B, C	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 2002.	A penalty of \$18,400 was requested, Since this fine was primarily the result of two unusual excursion events, Ref-Fuel requested and received a 25% reduction in the fine from Metro Enforcement. A penalty of \$13,800 was paid.	\$13,800.00
8/13/2004		USEPA	CERCLA -Notice of Potential Liability	The facility received a Notice Letter from USEPA regarding potential liability under CERCLA Section 107(a) for response actions in Lower Passaic River Study Area, New Jersey	ARC is among 52 named PRPs for a \$10MM study. ARC response is pending as background information is gathered. The Port Authority of NY/NJ and EIL insurance carrier have been notified.	\$0.00
6/28/2005	Title V Permit ID #07736	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the first calendar quarter of 2004.	A penalty of \$3,600 was requested and paid.	\$3,600.00
6/28/2005	Title V Permit ID #07736	New Jersey DEP	Notice of Violation	An Notice of Violation was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This violation was for the fourth calendar quarter of 2004. The NJDEP granted affirmative defense in the violation.	The NJDEP granted affirmative defense in the violation.	\$0.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
6/28/2005	Title V Permit ID #07736	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the fourth calendar quarter of 2004.	A penalty of \$12,200 was requested and paid.	\$12,200.00
6/29/2005	Title V Permit ID #07736	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 2003.	A penalty of \$17,700 was requested and paid.	\$17,700.00
6/30/2005	Title V Permit ID #07736	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 2003.	A penalty of \$10,400 was requested and paid.	\$10,400.00
9/2/2005	Title V Permit ID #07736	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the second calendar quarter of 2005.	A penalty of \$1,800 was requested and paid.	\$1,800.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
1/19/2006	Title V Permit ID #07736	New Jersey DEP	Administrative Order	An Administrative Order and Notice of Administrative Penalty Assessment was issued by the Department for violations of the Continuous Emissions Monitoring system limits. This assessment was for the third calendar quarter of 2005.	A penalty of \$2,000 was requested and paid.	\$2,000.00
6/7/2006	DPCC ID#071402277002	New Jersey DEP	Notice of Violation	During the facility's annual DPCC inspection it was alleged that the facility was not performing an annual spill drill as per the approved DPCC Plan. Also, it was alleged that the facility was not performing routine in-service inspections of applicable above ground storage tanks as per the approved DPCC Plan and API 653. On September 7, 2006 the facility received an AONOCAPA assessing a \$5,000 fine for this penalty.	Both deficiencies have been addressed at the facility, and it is now in compliance with the two items stated. An attempt is being made to reduce the fine.	\$0.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Niagara Falls NY		Facility: Niagara Waste-to-Energy Facility				
10/6/1993	Sanitary Sewer Discharge Permit	City of Niagara Falls	Notice of Violation	Alleges pH less than 5 for 5.8 minutes on 9/27/93.	Ref-Fuel wrote a letter to the City explaining the cause and corrective actions taken.	\$0.00
1/12/1996	Sanitary Sewer Discharge Permit	City of Niagara Falls	Notice of Violation	Alleges pH less than 5 on 1/10/96.	RESCINDED. The City rescinded the Notice of Violation on 1/24/96, stating that an investigation determined that the pH probe was defective and recorded erroneous values.	\$0.00
4/18/1996	Sanitary Sewer Discharge Permit	City of Niagara Falls	Notice of Violation	Alleges pH greater than 10 for more than 5 hours in one day.	RESCINDED. The NOV has been rescinded as per letter received from City of Niagara Falls on April 29, 1997.	\$0.00
2/28/1997	Sanitary Sewer Discharge Permit	City of Niagara Falls	Letter Citation	Alleges pH less than 5 on 2/28/97, exceedance was for approximately 5 minutes, since duration was short no formal NOV will be issued.	No further action was taken.	\$0.00
6/6/1997	Sanitary Sewer Discharge Permit	City of Niagara Falls	Notice of Violation	Alleges pH less than 5 on 5/25/97	Ref-Fuel paid a \$150.00 fine to the City of Niagara Falls.	\$150.00
11/25/1997	Air Permit - Certificate to Operate	New York State DEC	Notice of Violation / Consent Order	Special Permit Condition III.5 - simultaneous operation of boiler B-110 firing oil and boiler R1B02 firing alternative fuel.	Ref-Fuel paid a \$500.00 fine to the NYSDEC. In addition, training was given to all facility personnel on permit conditions.	\$500.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
2/26/1998	Air Permit - Certificate to Operate	New York State DEC	Notice of Violation	Special Conditions 1.M, 1.N, 1.O - exceedence of applicable limits for dioxin/furan, PAHs, selenium, and manganese on DBA Unit 3, and dioxin/furan on DBA Unit 4.	Ref-Fuel submitted an Emission Reduction Plan to the NYSDEC, and has successfully retested for the affected parameters. The Department subsequently issued a letter stating that the problems encountered are design flaws, and thus were unavoidable.	\$0.00
10/8/2002	Sanitary Sewer Discharge	City of Niagara Falls	Notice of Violation	Alleges pH less than 5 on 9/21/2002 in violation of Sewer Ordinance 250.5.1a.	Facility reported sanitary sewer exceedence verbally and by letter dated 9/30/02. An investigation found a failure of the dilution water system, and a valve arrangement that allowed concentrated acid to enter the sewer sytem via a sampling station. Procedures at the facility have been revised and logic in the control sytem has been enacted to prevent a recurrence, .	\$150.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Preston CT		Facility: Southeastern Connecticut Resource Recovery Facility				
2/25/1993	Final Air Permit/ 150-0012-0001-0	Connecticut DEP	Notice of Violation	Allegations of delinquent continuous emissions system report.	Ref-Fuel contested the NOV.	\$0.00
7/30/1993	Solid Waste Permit to Operate/ SW-1140201	Connecticut DEP	Notice of Violation	Allegations that metal and bulky waste non-ash residue were not stored in covered leak-proof containers.	Ref-Fuel contested the NOV.	\$0.00
5/1/1994	Final Air Permit/ 150-0012-0001-0	Connecticut DEP	Summons & Complaint	Civil action filed by Attorney General alleging an employee adjusted a continuous emissions monitoring device in Feb, 1993 to alter a reading in order to pass a CEMS audit	Stipulated Judgment. \$20,000 fine.	\$20,000.00
5/1/1995	Solid Waste Permit to Operate/ SW-1140201	Connecticut DEP	Notice of Violation	Allegations of visible ash residue dragout on the entrance and exit driveways to the ash loading building from ash loading vehicles inside the building.	Ref-Fuel contested the NOV.	\$0.00
2/5/1999	General Permit - Discharge of Stormwater	Connecticut DEP	Notice of Violation	Alleges failure to submit stormwater monitoring results for October 1, 1997 - September 30, 1998 pursuant to general permit Section 5(d)(3)(A).	RESCINDED. Ref-Fuel has contested the NOV, and received a letter from the Department stating that since the facility no longer discharges stormwater the violation and the regulations did not apply to the facility.	\$0.00

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Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
10/22/1999	Solid Waste Permit to Operate/ SW-1140201	Connecticut DEP	Notice of Violation	Alleges that the facility accepted demolition debris that was not permitted without utilizing the special waste approval plan.	The facility requested a rescission of this violation because statutory language exists that specifically permits the acceptance of this material. In addition, Ref-Fuel attended a meeting with the Department prior to the acceptance of this material to resolve any potential issues with the waste stream. A response from the Department is pending.	\$0.00
11/18/2002	Solid Waste Permit to Operate/ SW-1140201	Connecticut DEP	Notice of Violation	The Department alleges violations of the Department's Special Waste Disposal Plan. Specifically, the NOV alleges that Southeast failed to maintain a written special waste inspection program and failed to obtain analytical data for a "off-spec" commodity waste material.	A response to the NOV was submitted to the Department on 12/13/02 contesting the NOV and correcting the allegations noted. The CTDEP responded on 12/24/02 by closing out the NOV and stating no further action regarding this matter would take place.	\$0.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Rochester MA		Facility: SEMASS Waste-to-Energy Facility				
8/22/1996		Mass. DEP	Notice of Noncompliance	Alleges operating as a large quantity generator of waste oil with a small quantity generator status; an accumulation of waste oil that was on site for more than 180 days; lack of an established waste oil accumulation area; improper labelling of tanks of waste oil; improper labelling of satellite drums.	Letter from the MADEP dated October 11, 1996 acknowledges that Ref-Fuel has corrected the noncompliance allegations.	\$0.00
8/19/1997		Mass. DEP	Notice of Noncompliance	Alleges failure to submit an annual report, pursuant to 310 CMR 22.15(5).	RESCINDED. The facility contested the NON and submitted proof of submittal by registered mail receipt and submitted an additional copy of report. A rescision notice was received from the DEP in September, 1997.	\$0.00
4/21/1999		Mass. DEP	Notice of Noncompliance	Alleging a failure by SEMASS to submit Form Rs for sodium hydroxide and sulfuric acid by July 1, 1998 for reporting year 1997.	RESCINDED. The facility requested a rescision of the NON and provided proof that the report had been submitted. In response, the Department sent a formal rescision notice dated 5/19/99, stating that SEMASS had complied with the Toxics Use Reduction Act.	\$0.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
9/25/2000		Mass. DEP	Notice of Noncompliance	Alleges that facility created nuisance odor conditions in an off-site area adjacent to the facility.	As requested, the facility sent a response to the Department. The response stated that the facility does not believe the odors were caused by the facility, but rather by associated truck traffic. Furthermore, we restated Ref-Fuels commitment to continue to implement feasible odor mitigation techniques.	\$0.00
4/10/2003		Mass. DEP	Notice of Noncompliance	Alleges the facility failed to file a complete toxic use report for the calendar year 2001. Specific forms for two chemicals were not filed as part of the report submittal. The subject forms are required to be submitted by May 15, 2003.	The facility requested and was granted an extension via telephone on May 13, 2003 and confirmed it via letter dated May 21, 2003. A response was provided prior to the June 16th extension deadline. The facility contends that according to the regulations, a deficiency letter, not a notice of non-compliance was warranted. Attempts were made to have the NON rescinded, however the DEP never agreed to do so. The DEP did issue a return to compliance letter dated July 7, 2003, stating that the Facility was now in compliance with Toxic Use reporting under Massachusetts Regulations.	\$0.00
5/27/2004	PWS ID# 4250007	Mass. DEP	Notice of Noncompliance	The facility received a notice of noncompliance and a notice of return to compliance for an alleged exceedance of the MCL for coliform bacteria in the second quarter of 2004.	The facility chlorinated the distribution system and collected repeat samples as required, which resulted in the notice of Return to Compliance. This is the first violation in a 12-month period therefore the facility is not considered a significant non-complier as per 310 CMR 22.00.	\$0.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
2/15/2006	Title V Permit Facility ID 131580, Permit No. 4V95055	Massachusetts DEP	Notice of Non- Compliance	A Notice of Non-Compliance (NON) was issued for failure to timely submit the 2005 "Operating Permit Annual Compliance Certification and Report" and Semi-Annual Compliance Monitoring Summary and Certification". The reports were submitted on 2/8 and 2/9/06 respectively, but were due by 1/30/06.	SEMASS submitted a response to MADEP on 2/23/06 identifying the nature of the error and outlining corrective actions to be taken. The Department was satisfied with this response and MADEP issued a Return to Compliance (RTC) Letter on 2/28/06	\$0.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Rochester, MA		Facility: Carver/Marion/Wareham/Rochester Convenience Center				
3/25/2002	Solid Waste Permit	Mass. DEP	Notice of Noncompliance	A Notice of Noncompliance was issued alleging there was insufficient signage at the Facility and that the Facility was collecting glass containers for disposal rather than recycling in violation of 310 CMR 19.017(3).	American Ref-Fuel responded via letter on April 4, 2002 stating that the NOV should be retracted on the basis that the CMW Regional Refuse Disposal District is the permittee, not American Ref-Fuel. The response letter also states that American Ref-Fuel believes the signage posted is adequate and consistent with the Facility's Waste Ban Plan. In addition, it is believed the disposal of the glass is not a violation, and permitted as per 310 CMR. 19.017(6)(b) as temporary disposal due to the lack of an end user. The DEP has not responded in writing to our submittal, however, we believe their concerns have been satisfied since follow-up site inspections have occurred and no issues were found.	\$0.00

Compliance History

Date	Permit/License/ EPA ID#	Issuing Agency	Type of action	Nature of alleged violation	Status/Disposition	Fine Paid
Location: Westbury NY		Facility: Hempstead Resource Recovery Facility				
9/5/1989	Toxic or Hazardous Material Storage Facility Permit/ 01243	Nassau County DOH	Citation	Allegation of violation of Nassau County ordinance requiring a permit for oil/chemical storage tanks.	Permit had previously been applied for and was subsequently received. Nassau County dropped all proceedings. The ordinance had been enacted after the facility was designed.	\$0.00
2/28/2001	Article 19: Title V Operating Permit #1- 2820-01727/00028	New York State DEC	Notice of Violation	The Department alleged that on 1/8/01 the facility exceeded its 24-hour average NOx limit on units 1 and 3. NYSDEC requested a penalty of \$9,500.	American Ref-Fuel responded by letter dated March 13, 2001 claiming the incident was a malfunction of APC equipment and meets the conditions of a waiver. Ref-Fuel requested NYSDEC to rescind NOV. Ref-Fuel submitted the "Engineering Evaluation of the Nox Control System" June 27, 2001. The Department continued to pursue the violation and an Order on Consent was signed and the fine paid on July 3, 2002.	\$9,500.00

Form HW-C Compliance History

Enforcement Actions

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
6/30/96	Alexandria	CAA / RACT	VA DEQ	Consent Agreement	NOx Control Retrofit. MACT	CLOSED	\$0.00
7/31/98	Alexandria	CAA / RACT	VA DEQ	Consent Agreement	Amended Nox Control Retrofit.	Retrofit complete CLOSED	\$0.00
2/11/99	Alexandria	SIU Wastewater	Alexandria Sanitation Authority	Warning Letter	Exceeding monthly daily average wastewater flow.	CLOSED	\$0.00
2/28/99	Alexandria	SIU Wastewater	Alexandria Sanitation Authority	NOV	Maximum daily average for total mercury was exceeded on 5/11/99.	Resample OK. CLOSED	\$0.00
5/1/00	Alexandria	SIU Wastewater	Alexandria Sanitation Authority	NOV	pH wastewater violation.	CLOSED	\$0.00
10/6/00	Alexandria	PSD Air Permit	VA DEQ	NOV	Failure to complete 2nd Quarter Certified Gas Audit (CGA).	CLOSED	\$4,000.00
4/18/02	Alexandria	Title V / PSD	VA DEQ	NOV	Failure to submit 3 quarterly reports on time.	HPV Status. Not paid pending bankruptcy proceeding of issuing note.	\$10,650.00

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
6/14/02 & 10/21/02	Alexandria	Solid Waste Permit	VA DEQ	2 Warning Letters	Failure to provide annual closure cost estimate and financial assurance.	Reports filed 11/4/02. CLOSED	\$0.00
4/1/03	Alexandria	Title V Air Permit	VA DEQ	NOV	Burning of supplemental waste which not defined as MSW.	Facility has agreed to not process supplemental waste. CLOSED	\$0.00
5/14/03	Alexandria	SIU Wastewater	Alexandria Sanitation Authority	Warning Letter	Improper sample collection for cyanide by testing contractor.	ASA conducted on-site compliance review meeting with contractor. CLOSED	\$0.00
8/3/04	Alexandria	Solid Waste Permit	VA DEQ	Warning Letter	Failure to submit annual update to the cost closure prior to 11/6/03.	Response sent 10/12/04. CLOSED	\$0.00
1/30/06	Alexandria	SIU Wastewater	Alexandria Sanitation Authority	Verbal Warning	pH wastewater excursion on 1/21/2006	Follow-up documentation submitted to resolve verbal warning CLOSED	\$0.00

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
2/9/01	Covanta Babylon	1-4720- 00777/00008	NY State DEC	NOV	NOX Exceedence	CLOSED	\$ 5000-

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
11/26/97	Bristol, CT	Solid Waste Permit No. 017- RR-5	CT DEP	NOV	NOV issued for storage of MSW and that waste was not being unloaded directly into the pit.	CLOSED	\$0

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
9/7/95	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
9/8/95	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
9/12/95	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
6/1/96	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
8/15/96	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
9/12/96	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None

Form HW-C Compliance History

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
9/16/96	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
10/22/96	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor	CLOSED	None
2/19/97	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	Letter to MDEQ	Odor Management Plan developed and implemented	CLOSED	None
9/25/97	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	MDEQ inspection/violation	Liquid industrial waste violation	CLOSED	None
10/30/97	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	MDEQ inspection-non compliance	Solid waste in doorway, Ash storage bldg.	CLOSED	None
11/26/97	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	MDEQ Letter of Warning	Regarding inspection on 9/25/97	CLOSED	None
1/28/98	Detroit	Permit No. 003-060	Detroit Water and Sewerage Department	Notice of exceedance	Effluent exceedance for PCB	CLOSED	None

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
4/3/98	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	Termination of Consent Order No. 3-1991	N/A	CLOSED	None
8/21/98	Detroit	Permit No. 003-060	Detroit Water and Sewerage Department	NOV	Six Month Report (SMR) . PCB holding time and ash water spill to sewer.	CLOSED	None
9/10/05	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV resinded	surpassed sulfur content #2 fuel oil.conflicting lab results. Retesting found 1st test in error.	CLOSED	None
1/14/99	Detroit	Permit No. 003-060	Detroit Water and Sewerage Department	NOV, NOA (Notice Of Acceptance)	Six Month Report (SMR) .Facility Lab (RTI) did not follow proper procedures for BOD plant time exceeding the 48 hour starting time.Superceded by NOA 4/7/99.	CLOSED	None
2/6/99	Detroit	Permit No. 003-060	Detroit Water and Sewerage Department	Notice of exceedance	Halogenated phenols from wastewater collected 11/18/98	CLOSED	None
6/5/02	Detroit	Permit No.s C-9190 through C9193 & C-6467 through C-6481	Michigan Dept. of Environmental Quality & Wayne County	NOV	Odor violation	CLOSED	None

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
4/3/98	Fairfax	CAA / RACT	VA DEQ	Consent Agreement	NOx SNCR retrofit system.	APC Installed. CLOSED	\$0.00
6/19/00	Fairfax	PSD Air Permit	VA DEQ	Warning Letter	Failure to calculate BTU/lb of MSW. Failure to calculate moisture content of MSW.	Response sent 7/24/00. CLOSED by DEQ on 8/21/00.	\$0.00
2/16/02 & 10/15/02	Fairfax	Solid Waste Permit	VA DEQ	Warning Letter	Failure to submit annual closure cost estimate adjusted for inflation. Failure to submit financial assurance statement.	Information submitted. CLOSED	\$0.00
4/1/03	Fairfax	PSD Air Permit	VA DEQ	NOV	Burning of supplemental waste not defined as MSW.	Open. Subject to resolution upon issuance of new Title V Air Permit.	\$0.00

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
2/10/04	Fairfax	Direct Discharge Water Permit VA 0090638	VA DEQ	Warning Letter	Failure to submit last (6) semi- annual water test results.	Response sent 2/25/04. Direct Discharge system has not been constructed and is not operational. CLOSED	\$0.00

Form HW-C Compliance History

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
12/1/87	Haverhill Landfill\Lawrence Facilities		MA DEQE	ACO 722	Lawrence (Stevens Pond) & Haverhill Landfill storm and wastewater discharges	Closed out in 2004	\$70,000.00
10/19/88	Haverhill Landfill		MA DEQE	Amended CO	Requirement to demonstrate sufficient landfill capacity	Ongoing	NONE
7/8/96	Haverhill Landfill		Haverhill WWTP	NOV	Exceeded daily maximum lead in leachate discharge to city WWTP	Repealed in 1997	NONE
10/2/96	Lawrence		MA DEP	NON	Not reporting O&HM release within MCP requirements	CLOSED	???
10/24/96	Haverhill Massburn		MA DEP	NON	Exceeding supplemental/special waste processing limit		??
4/23/97	Haverhill MassBurn		MA DEP	NON and CO	Failed to submit a Toxics Use Reduction Plan/Plan Update	CLOSED	\$500.00
9/3/97	Haverhill Massburn\ Lawrence Facilities		USEPA	NOV	Maintaining operating temperature\monitoring charging rates	CLOSED	???

Form HW-C Compliance History**Enforcement Actions**

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
11/5/1999	Hennepin Co., MN	05300400	MPCA	Notice of Non-Compliance	Failure of Compliance Unit 2 Stack Test: HCl June 7-9 and Indeterminate PCDD/PCDF June 10-15, 1999.	CLOSED 03-15-01	\$22,000.00
12/17/1999	Hennepin Co., MN	05300400	MPCA	Request for Information	In reference to June 99.stack test	CLOSED 09-25-01	
01/30/2003	Hennepin Co., MN	05300400	MPCA	Letter of Warning	Monitor Downtime - Failure to continuously operate SO2 monitor during the 3 rd Qtr2002.	CLOSED 02-11-03	
12/11/2003	Hennepin Co., MN	05300400	MPCA	Notice of Violation	Alleged violations of certifying six quarterly reports containing inaccurate information. Caused by a CO programming error that did not update correctly.	CLOSED 12-23-03	
12/10/2004	Hennepin Co., MN	05300400	MPCA	Administrative Penalty Order	Alleged violations of Air Permit for failure to maintain fully certified operations staff. Failure to properly report this violation (annual and semi-annual reports).	CLOSED 01-26-05	\$4,200.00

Form HW-C Compliance History

Covanta Hillsborough
350 N Falkenburg Rd
Tampa FL 33619

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
8/6/99	Covanta Hillsborough	PSD-FL-121(B)	Hillsborough County EPC	HC - EPC Warning Notice	Failure of compliance test. Retest successful. Consent Order 099-0721DML0261	CLOSED	\$8,250.00
12/31/02	Covanta Hillsborough	Title V Permit 07502-61-001-AV	Hillsborough County EPC	HC - EPC Warning Notice	Carbon monoxide air emissions.	CLOSED	\$0.00
11/5/03	Covanta Hillsborough	Title V Permit 07502-61-001-AV	Hillsborough County EPC	HC - EPC Warning Notice	Failure to inject carbon at rate determined by testing. Consent Ordar 03-0824AR0261	CLOSED	\$13,200.00

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
####	Honolulu	UO-1376	Safe Drinking Water Branch	HDOH acknowledge ment	Acknowledges report of UIC cooling tower water disposal quantities	No action taken	None
12/8/1994	Honolulu	UO-1376	Safe Drinking Water Branch	HDOH acknowledge ment	Acknowledges report of UIC cooling tower water disposal quantities	No action taken	None
10/25/96	Honolulu	UO-1376	Safe Drinking Water Branch	HDOH warning letter	Lab error in UIC analysis	No action taken	None
11/30/99	Honolulu	PTO 598-1475 and PSD HI 84-01	Clean Air Branch	HDOH warning letter	Late submittal of the 2nd qtr RATA repot	No action taken	None
10/8/01	Honolulu	COV 0255-01-C	Clean Air Branch	HDOH informal written notice	Late submittal of the semi annual fuel oil momitoring report	The report was completed on time, but was inadvertently left out when the semi annual report was mailed. Report was subsequently submitted.	None

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
5/7/03	Honolulu	COV 0255-01-C	Clean Air Branch	HDOH informal written notice	Six minute opacity averages greater than 20 percent for 2001, 2002 and 2003 during warm-up, start up, shut down and malfunctions were cited by the DOH.	The Title V air permit was amended to clarify opacity averages during abnormal events were not a violation of the air permit.	None
2/28/05	Honolulu	R70B771	Clean Water Branch	HDOH notice of apparent violation	Violation of Hawaii Revised Statutes and Administrative Rules regarding stormwater runoff	Facility addressed all items cited in the notice of apparent violation. Letter from DOH dated April 13, 2005 acknowledged the corrections made by the facility and closed the case. Facility is continuing work on improving onsite stormwater management.	None
12/5/05	Honolulu	COV 0255-01-C	Clean Air Branch	HDOH Notice of Finding and Violation Forthcoming	Failure of annual stack emissions test for dioxin/furan for unit 1 and lead for unit 2	3/29/06 received notice of finding and violation	Paid \$6200 fine. Docket closed 5/2/06

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
05/2/2006	Honolulu	COV 0255-01-C	Clean Air Branch	Informal NOV	For reported opacity exceedances on 3/25, 3/26 and 3/28/06	No action taken	None

Covanta Huntington
 99 Town Line Rd
 Huntington, NY 11743

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
8/17/98	Huntington NY	General Ordinance	Sukolk Co Dept of Health Services	Notice of Formal Hearing	Failure to upgrade ASTs to Article 12 standards.	Brought tanks into compliance	\$0.00
11/3/99	Huntington NY	Clean Air Act	NYSDEC	NOV	Failure to comply with increments of progress for Clean Air Act Amendments	Installation of carbon system approved - CLOSED	\$0.00

Form HW-C Compliance History

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
				NONE			

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
1/25/96	Ogden Martin Systems of Indianapolis	Industrial DischargePermit #495301	City of Indianapolis, Department of Public Works - Water and Land Protection Division	Notice of Violation	Wastewater Cd, Cu, Zn, Pb	CLOSED 2-23-96	None
11/12/97	Ogden Martin Systems of Indianapolis	NA	Indiana Department of Environmental Management	Notice of Non - Compliance	Stormwater Pollution Prevention procedures not met	CLOSED 4/15/1998- IDEM concurred with facility stance that storm water plan was not required	None
9/14/99	Ogden Martin Systems of Indianapolis	Solid Waste Permit # FP 49-13	Indiana Department of Environmental Management - Solid and Hazardous Waste Management	Notice of Violation	fugitive dust NOV received due to the malfunction of the street sweeper.	CLOSED 12/21/1999	\$1,000

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Date	Location	Permit/License/ EPA ID #.	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
11/26/01	Covanta Indianapolis, Inc.	Title V Air Permit #T097-5985-00123	Indiana Department of Environmental Management - Office of Air Quality	Notice of Violation	paperwork violation where carbon mass feed rate was reported using a 6-hour averaging period instead of the 1-hour averaging period requested by IDEM.	CLOSED 11/26/2001	None
4/20/01	Covanta Indianapolis, Inc.	Industrial Discharge Permit #495301	City of Indianapolis, Department of Public Works - Water and Land Protection Division	Notice of Violation - Rescinded	3/1/01 water sample analysis by city indicated lead permit limit exceedance	CLOSED 5/30/01 analysis results of split sample, averaged with city results met permit limit	None
3/11/04	Covanta Indianapolis, Inc.	Title V Air Permit #T097-5985-00124	Indiana Department of Environmental Management - Office of Air Quality	Inspection Violation letter	2/6/04 Inspection cited lack of quarterly baghouse inspections	CLOSED 3/15/04 facility developed quaterly program to inspect all baghouses	None
6/19/04					pH below permit limit	CLOSED - The facility sent a letter indicating	

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Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
8/31/04	Covanta Indianapolis, Inc.	Industrial Discharge Permit #495301	White River Environmental Partnership - United Water	Non - compliance Notification	Temperature above City Regulation limit	that unless they received any objections from the City's office regarding the NONs, they were considering them closed.	None
4/22/05	Covanta Indianapolis, Inc.	Title V Air Permit #T097-5985- 00125	Indiana Department of Environmental Management - Office of Air Quality	Violation Letter Recinded	Alleged violations regarding reporting of a carbon feed rate deviation.	CLOSED- On 10/25/05 the facility received a letter from IDEM confirming its' interpretation of compliance with permit limits for minimum carbon feed rate.	None

IPP Enforcement History – Revised 1/31/06

Year of Enforcement Action	Facility	Permit / License	Action/Issued Date	Allegation/Nature of Action	Fine Paid	Date Resolved/Date Paid
1998	Mt Lassen – ½ Mile West of Town Co. Road A-21, Westwood, CA, Lassen Co.	Title V Major Facility Operating Permit	NOV	Failed particulate test in 1997, replaced precipitator	N/A	06/10/1999
1999	Burney – Hwy 299 & Energy Drive, Burney, CA, Shasta Co.	Air Emissions Permit to Operate	Shasta County AQMD - NOV 6/99	Failure to promptly report opacity excursion 99-NV-26	\$250	08/12/1999
	Toyon – 5050 Mount Hollywood Drive, Los Angeles, CA	Air Emissions Permit to Operate	South Coast AQMD - NOV 9/99	Operating small condensate tank without permit	\$6,000	06/9/2000

IPP Enforcement History – Revised 1/31/06

	Otay – 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Wastewater Discharge Permit	San Diego Metro Water District - NOV 5/99	Exceeding oil & grease limit	\$100	07/4/1999
	Penrose – 8301 Tujunga Ave. Sun Valley, CA	Air Emissions Permit to Operate	South Coast AQMD - Notice to Comply 1/99	Excessive landfill gas emissions around well casing, resealed well casing.	N/A	Jan-99
2000	Otay – 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Wastewater Discharge Permit	San Diego Metro Water District - NOV 9/00	Exceeding oil & grease limit	\$100	03/14/2001
	Otay – 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Wastewater Discharge Permit	San Diego Metro Water District - NOV 9/00	Exceeding oil & grease limit	\$100	03/14/2001
	Chinese Station – 8755 Enterprise Drive, Jamestown, CA, Tuolumne Co.	No Permit Violation – Discharge of solid waste to land	Regional Water Quality Control Board - Abatement Order 5/00	Tramp material	Settlement of approx. \$150k paid to Tuolumne Co. Dist. Attorney	07/30/2004

IPP Enforcement History – Revised 1/31/06

	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA	Air Emissions Permit to Operate	Butte County AQMD - NOV 3/00	Fugitive emissions (dust) beyond property line	\$360	04/26/2000
2001	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Butte County AQMD. - NOV 1/01	Exceeding NMOC limit	\$1,140	04/3/2001
	Penrose – 8301 Tujunga Ave. Sun Valley, CA	Air Emissions Permit to Operate	South Coast AQMD - Notice to Comply 12/01	Excessive landfill gas emissions around well casing, resealed well casing	N/A	12/19/2001
	Second Imperial Geothermal Co.		Imperial County APCD - NOV 5/01	VRU not meeting permit limit. N/A Proposed \$15k penalty waived, probation thru 12/5/02.	N/A	12/5/2002
2002	Gude		Maryland Department of the Environment NOV 4/24/02	Record keeping violation, failure to maintain records for landfill daily condensate injection for 7/99-7/01.	See Gude 2003 below	Settlement combined with Gude NOV issued 3/19/03.

IPP Enforcement History – Revised 1/31/06

	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Butte County AQMD - NOV 1/02	Fugitive emissions and nuisance from fuel fire	\$32,604	04/4/2002
	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	AQMD - Notice of Non- Compliance 11/14/02	Replacement of opacity monitor in May 1999 without obtaining an Authority to Construct Permit authorizing the replacement. (Original	N/A	03/23/2003
	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Regional Water Quality Control Board - NOV 1/31/02	Unauthorized discharge to off-site creek (fire water percolation)	N/A	04/2/2002
	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Butte County AQMD - Notice of Non- compliance #1598 Nov. 14, 02	Authority to construct permit application not filed for replacement of opacity monitor in May 1999	Settlement proposed by AQMD - no fine or penalty. Probationary	11/14/2002
	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Regional Water Quality Control Board Warning Letter 8/02	Excess concentration of discharge water in January 2002.	N/A	12/3/2002

IPP Enforcement History – Revised 1/31/06

2003	Gude	Air Emissions Permit to Operate	Maryland Department of the Environment - NOV 3/19/03	Failure to maintain records for visible emissions observations and quantity of landfill condensate processed for 1/02-4/02. This NOV settlement combined with previous 4/24/02 Gude recordkeeping NOV.	\$17,010	09/5/2003
	Otay – 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Wastewater Discharge Permit	Notice of Violation #25-0049 8/25/03	Discharge outside of pH range.	\$50	09/28/2003
	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Notice of Non-Compliance 7/10/03	Nine opacity exceedances in March, April and May 2003.	\$17,010	07/25/2003
2004	Otay – 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Air Emissions Permit to Operate	Air Pollution Control District (APCD) Notice of Violation #213784	Excess landfill gas emissions around well bore.	\$1,275	04/8/2004
2004	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Notice of Noncompliance – Butte Co. AQMD	Exceedances of Opacity permit limits in Sept. and Oct. 2004	\$10,500	01/11/2005

IPP Enforcement History – Revised 1/31/06

2004	Otay – 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Air Emissions Permit to Operate	Notice of Violation – San Diego APCD	Exceedances of limits of emissions around well casings	\$1,275	01/30/2004
2005	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Notice of Noncompliance – #1180 and 1181, Butte Co. AQMD 6/2/05	Exceedances of NOx and Opacity permit limits in Dec. 2004 and Jan, March, and April of 2005.	\$1,837	09/9/2005
2005	Pacific Oroville Power – 3050 S. 5 th Ave. Oroville, CA – Butte Co.	Air Emissions Permit to Operate	Notice of Noncompliance – #1888, Butte Co. AQMD 8/18/05	Fugitive Dust Beyond Property Lines	N/A	Response submitted 10/10/05. No fine or penalty proposed as of this date.
2005	Otay- 1600 Maxwell Road, Chula Vista, CA, San Diego Co.	Wastewater Discharge Permit	San Diego Metro Water District- NOV 11/1/05	Omitted first discharge date of sampled wastewater on self monitoring report	\$50	12/28/2005
2005	Pacific Recovery Corporation Salinas – 350 Crazy Horse Canyon Rd., S. Salinas, CA – Monterey Co.	Permit to Operate	Notice of Violation #06-025 Monterey Bay United APCD	Late submittal of Annual Title V Certification & Semi-annual monitoring report	N/A	Pending
Total Fines Paid:					\$ 239,661	

Form HW-C Compliance History

Enforcement Actions

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date Issued	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
7/18/05	Kent Facility	199600163	MDEQ	LOV	Excess emissions of NOx & SNCR system not operated properly	Open	None at this time

Form HW-C Compliance History

Enforcement Actions

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
4/3/97	Lake	0690046-001-AV	FL DEP	Consent Order	Annual air compliance test showed hydrochloric acid exceeded permit limit	CLOSED	\$1,470.00
6/13/01	Lake	0690046-001-AV	FL DEP	Consent Order	Annual air compliance tests showed mercury exceeded permit limit. Exceeded throughput limit. Exceeded CO limit.	CLOSED	\$104,100.00
1/13/06	Lake	0690046-001-AV	FL DEP	Consent Order	Operation of a facility without a fully certified operator on duty	CLOSED	\$2,500.00

Form HW-C Compliance History - Lancaster County RRF

Enforcement Actions

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
8/5/97	Lancaster County RRF, Bainbridge, PA	36-340-001	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 1995, 1995, and 1996.	Closed	\$30,342.00
8/7/98	Lancaster County RRF, Bainbridge, PA	36-340-001	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 3rd/4th Qtr 1997 and 1st Qtr 1998.	Closed	\$4,302.00
6/28/99	Lancaster County RRF, Bainbridge, PA	36-02013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 2nd/4th Qtr 1998.	Closed	\$5,002.00
8/14/00	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 1st/2nd Qtr 1999.	Closed	\$1,906.00
6/4/01	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 3rd Qtr 1999 - 2nd Qtr 2000.	Closed	\$10,659.00
7/20/01	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 4th Qtr 2000 - 1st Qtr 2001.	Closed	\$4,600.00
5/20/02	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 3rd Qtr 2001.	Closed	\$12,879.00
8/9/02	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 2nd/4th Qtr 2001.	Closed	\$20,117.00
1/17/03	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 1st Qtr 2002.	Closed	\$17,400.00

Form HW-C Compliance History - Lancaster County RRF

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
3/26/03	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 2nd/3rd Qtr 2002.	Closed	\$4,801.00
4/22/03	Lancaster County RRF, Bainbridge, PA	36-62776	PaDEP	Consent Assessment of Civil Penalty	Settlement for unauthorized removal of a NaOCL storage tank	Closed	\$1,000.00
9/5/03	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 4th Qtr 2002 - 1st Qtr 2003.	Closed	\$4,300.00
3/12/04	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 2nd/3rd Qtr 2003.	Closed	\$2,600.00
3/22/04	Lancaster County RRF, Bainbridge, PA	Docket No. 19880901	Susquehanna River Basin Commission	NOV	Rescinded NOV issued 3/5/04 based on explanation of excessive water usage.	Closed	\$0.00
7/2/04	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 4th Qtr 2003 - 1st Qtr 2004.	Closed	\$7,564.00
11/1/04	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Unit #2 mercury stack test failure - November 2003.	Closed	\$12,000.00
8/5/05	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 2nd - 4th Qtr 2004.	Closed	\$11,289.00
11/22/05	Lancaster County RRF, Bainbridge, PA	36-05013	PaDEP	Consent Assessment of Civil Penalty	Settlement for emission violations for 1st - 2nd Qtr 2005.	Closed	\$7,529.00

Fort Meyers, FL 33905

Enforcement Actions

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
4/22/00	Lee Co	NPDES MSGP FLR05B588	EPA	NOV (rescinded)	Alleged reporting violations of the NPDES MSGP	CLOSED	NONE

Form HW-C Compliance History

Enforcement Actions Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

<u>Date</u>	<u>Location</u>	<u>Permit/ License/ EPA ID #</u>	<u>Issuing Agency</u>	<u>Type of Action</u>	<u>Nature of Violation</u>	<u>Dispositi on</u>	<u>Dollar Amount of Penalty</u>
03/4/1999	Marion OR	OR TV 24- 5398	Oregon DEQ	NON	Reporting	No further action	None

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Form HW-C Compliance History

Enforcement Actions

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
9/28/98	Hartford, CT	Air Permit 0044, 0045, 0046	CTDEP	NOV	Issued for an alleged violation of the odor regulations.	Closed	\$0
5/5/00	Hartford, CT	Waste Water Discharge Permit SP0000850	CTDEP	NOV	Issued for deficiencies in the sampling reporting on the waste water discharge monitoring reports.	Closed	\$0

Form HW-C Compliance History

Covanta Montgomery and Montgomery Transfer Station

Enforcement Actions

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
	Covanta Montgomery, Inc Dickerson, MD Montgomery Transfer Station, Derwoon MD			NONE NONE			

Form HW-C Compliance History**Enforcement Actions**

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
2/5,6/97	Onondaga, NY	7-3142- 00023/00002-0	NYSDEC	NOV, consent order	Stack test HCL lb/hr violation	Closed 9/3/97	\$3,000.00
1/29-2/1/99	Onondaga, NY	7-3142- 00023/00002-0	NYSDEC	NOV, consent order	Stack test HCL lb/hr violation	Closed 2/7/00	\$10,000.00
12/1/00	Onondaga, NY	7-3142- 00023/00002-0	NYSDEC	NOV, consent order	Stack test NOx ppm 3-hour average violation	Closed 3/6/01	\$3,000.00
10/6/02	Onondaga, NY	7-3142- 00028/00009 Title V	NYSDEC	NOV, consent order	Loss of carbon flow to scrubber	Closed 2/27/03	\$3,000.00
3/01 - 8/01 6-months	Onondaga, NY	7-3142- 00028/00009 Title V	NYSDEC	NOV, consent order	Improper disposal of solid waste; ash on steel	Closed 7/3/03	\$5,000.00

Form HW-C Compliance History

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
4/23/97	Pasco	1010056-002-AV	FL DEP	Consent Order	Annual air compliance test showed mercury exceeded permit limit	CLOSED	\$8,240.00

Form HW-C Compliance History

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
7/13/95	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Elevated SO2 due to wall board in MSW waste stream	CLOSED	\$250.00
12/27/95	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded 8-hour average SO2 limit	CLOSED	\$500.00
12/29/05	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded 8-hour average SO2 limit	CLOSED	\$500.00
8/30/96	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded permitted limit for opacity of 20%	CLOSED	\$500.00
11/18/96	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded 24-hour steam load limit	CLOSED	\$250.00
8/3/97	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded 8-hour average SO2 limit	CLOSED	\$1,000.00
2/11/98	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Did not maintain the permitted roof top temperature	CLOSED	\$500.00
4/7/00	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Discharge of hazardous waste without a permit. This citation was settled through a Consent Decree	CLOSED	\$150,000.00

Form HW-C Compliance History

Enforcement Actions

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
9/27/00	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded permitted limit for opacity of 10%	CLOSED	\$3,600.00
12/1/00	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded half of the daily NOx limit on one unit	CLOSED	\$2,480.00
9/28/01	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded half of the daily NOx limit on one unit	CLOSED	\$300.00
5/9/04	Stanislaus County Crows Landing, CA	N-2073	SJVAPCD	NOV	Exceeded the 4-hr Block CO limit	OPEN	N/A
3/4/05	Stanislaus County Crows Landing, CA	50-AA-0009	CIWMB	NOV	Exceeded the daily tons of MSW limit	CLOSED	No Penalty

Walter B. Hall Facility
 2122 S. Yukon Ave.
 Tulsa, OK 74107

Note that Covanta operation of this facility ceased in September 2003.

Enforcement Actions

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
8/12/99	Tulsa,OK	Industrial Waste Ordinance	Tulsa Dept of Public Works	NOV	Exceeded discharge pH on 8/9/99	CLOSED	\$50.00
12/9/99	Tulsa,OK	Operating Permit 84-023T-O (M-2)	DEQ	NOV	Failure of HCl and dioxin, failure to provide notice of stack test	Dioxin issue settled, HCl issue OPEN	\$0.00
5/3/01	Tulsa,OK	NPDES WD87- 014	DEQ	NOV	Exceedances of TSS limit in NPDES permit	OPEN	\$0.00
7/3/02	Tulsa,OK	99-018-TV 84-023T-O (M-2) 86-002T-O (M-2)	DEQ	Notice of Deficiency	Request for an applicability determination for issues related to Title V application and existing permits.	OPEN	\$0.00
9/2/03	Tulsa,OK	General Ordinance	Tulsa Dept of Public Works	NOV	Violation of Storm Water Ordinance on 8/23/03 due to failure of sanitary sewer line.	OPEN	\$0.00

Form HW-C Compliance History

Covanta Union
1499 Rt 1 North
Rahway, NJ 07065

Enforcement Actions

Including: NOV's; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
02/6/1996	Union County New Jersey	Permit No. 045	Rahway Valley Sewerage Authority	NOV	Exceedance of permitted limits for cadmium, lead and zinc due to potential contamination from tipping floor drain.	CLOSED	No penalty assessed
01/14/1998	Union County New Jersey	Permit No. 045	Rahway Valley Sewerage Authority	NOV	Exceedance of permitted limits for lead and zinc due to potential contamination from tipping floor drain.	CLOSED	No penalty assessed
08/4/2000	Union County New Jersey	Permit No. 045	Rahway Valley Sewerage Authority	NOV	Exceedance of permitted limits for zinc due to potential contamination from tipping floor drain.	CLOSED	No penalty assessed
09/6/2000	Union County New Jersey	Permit No. 045	Rahway Valley Sewerage Authority	NOV	Exceedance of permitted limit for zinc due to potential contamination from tipping floor drain.	CLOSED	No penalty assessed
4/6/94 – 12/31/96	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	ACO	Violation of air permit limits for CO, Opacity, NH3, NOx, NMHC, O2 and BHIT	CLOSED	\$65,200 fine paid
05/26/1997	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO	CLOSED	Paid \$6000 penalty
6/21-22/97	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO	CLOSED	Affirmative defense granted; No penalty
6/24-25/97	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO	CLOSED	Affirmative defense granted; No penalty
8/5-6/97	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO	CLOSED	Affirmative defense granted; No penalty

Form HW-C Compliance History

Covanta Union
1499 Rt 1 North
Rahway, NJ 07065

Enforcement Actions

Including: NOVs; administrative orders; civil penalties; permit or license suspensions; bond forfeiture actions; consent orders, adjudications or decrees; monetary settlements; court proceedings; or convictions concerning Environmental Protection Acts, or a regulation or order or a condition of a permit or license.

Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
02/26/1998	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to fire protection system PLC card failure	CLOSED	Affirmative defense granted; No penalty
03/10/1998	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to combustion upset	CLOSED	Pending
06/15/1998	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to ID fan trip caused by false vibration alarm	CLOSED	Affirmative defense granted; No penalty
06/17/1998	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to utility substation fault which tripped plant off	CLOSED	Affirmative defense granted; No penalty
08/3/1998	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO, NH3, NOx and SO2 caused by a tube leak	CLOSED	Affirmative defense granted; No penalty
04/12/1999	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for NOx caused by a damper malfunction	CLOSED	Affirmative defense granted; No penalty
05/17/1999	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for NH3, improperly functioning ammonia vaporizer	CLOSED	Affirmative defense granted; No penalty
01/25/2000	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO inadvertent damage to control air line	CLOSED	Paid \$2,600 penalty
03/25/2000	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for Opacity partially open bypass damper	CLOSED	Paid \$2,400 penalty
04/25/2000	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to loss of coolant to critical facility equipment	CLOSED	Affirmative defense granted; No penalty
08/21/2000	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO caused by a tube leak	CLOSED	Affirmative defense granted; No penalty

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09/18/2000	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO caused by a tube leak	CLOSED	Affirmative defense granted; No penalty
12/30/2000	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO caused by a tube leak	CLOSED	Affirmative defense granted; No penalty
05/10/2001	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for SO2 due to outlet SO2 values being higher than inlet SO2	CLOSED	Affirmative defense granted; No penalty assessed
05/29/2001	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion upset	CLOSED	Paid \$800 penalty
06/23/2001	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for NOx due to ammonia flow control difficulty	CLOSED	Paid \$1,600 penalty
07/22/2001	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion upset	CLOSED	Affirmative defense granted; No penalty
12/6/2001	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for Opacity due to the return of filtercake to bags after airflow and differential pressure was restored to baghouse following the clearing of a blockage while the unit was offline	CLOSED	Affirmative defense granted; No penalty assessed

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02/9/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO and NOx due to the loss plant control air and other auxiliary systems which resulted in the trip of the turbine. The cause was found to be the short circuit of the power supply for the DCS caused by a fuse that was misplaced during maintenance activities.	OPEN	Administrative hearing requested
02/25/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for NOx over a 24-hour period due to control difficulties associated with a vaporizer problems.	CLOSED	Affirmative defense granted. No penalty assessed.
07/19/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a plant trip caused by voltage fluctuation during thunderstorm activity.	CLOSED	Affirmative defense granted; No penalty assessed
08/7/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO, NOx and SO2 due to a fan trip caused by the malfunction of motor protective relay	CLOSED	Affirmative defense granted; no penalty assessed
09/2/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to an auxiliary burner trip caused by low gas pressure due to unusually high natural gas demand.	CLOSED	Affirmative defense granted; No penalty assessed

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
10/14/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit of NOx on a 24-hour basis due to a combustion upset.	CLOSED	Paid \$1,600 penalty
10/18-19/2002	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a plant trip caused by the malfunction of the positioner on the main steam vent.	CLOSED	Affirmative defense granted; No penalty assessed
02/5/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit of CO due to a feedchute plug.	CLOSED	Paid \$800 penalty
02/18/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit of CO due to a combustion upset.	CLOSED	Paid \$2,400 penalty
05/20/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit of CO due to combustion fan trip caused by the malfunction of a steam pressure switch	CLOSED	Affirmative defense granted; No penalty assessed
05/26/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit of CO due to a combustion upset.	CLOSED	Paid \$10,000 penalty
8/14-15/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limits for CO, NOx, SO2 and NH3 due to Northeast power outage.	CLOSED	Affirmative defense granted; No penalty assessed
08/31/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to fan trip resulting from turbine trip caused by local utility frequency disturbance.	CLOSED	Affirmative defense granted; No penalty assessed

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
10/1/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit of CO, NOx and SO2 due to a plant trip caused by the local utility voltage spike	CLOSED	Affirmative defense granted; No penalty assessed
11/9/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion upset	CLOSED	Paid \$9,600 penalty
11/17/2003	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion fan trip caused by a low boiler drum level	CLOSED	Paid \$6,000 penalty
03/18/2004	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion upset	CLOSED	Paid \$1,200 penalty
09/27/2004	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion upset	CLOSED	Paid \$800 penalty
5/14/04 – 9/30/04	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Failure to keep records of Carbon and Lime Silo baghouse inspections and monthly visible emissions monitoring; Failure to keep records of monthly visible emissions monitoring for Residue/Ferrous Handling System	CLOSED	No penalty assessed
11/7/2004	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a combustion upset	CLOSED	Paid \$1,200 penalty
12/2/2004	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for Opacity due to baghouse maintenance activities	CLOSED	Paid \$200 penalty

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12/31/2004	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limits for CO and SO2 due to a tube rupture	CLOSED	Affirmative defense granted; No penalty
01/13/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to tube rupture	CLOSED	Affirmative defense granted; No penalty
02/7/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for NOX due to combustion difficulties	CLOSED	Paid \$800 penalty
02/18/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to the short circuited of export line used to service the facility.	CLOSED	Affirmative defense granted; No penalty assessed
03/27/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to a sudden tube rupture	CLOSED	Affirmative defense granted; No penalty
04/18/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for NOX due to combustion difficulties	CLOSED	Paid \$1600 penalty
08/15/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to combustion difficulties	CLOSED	Paid \$7200 penalty
09/19/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limits for CO and SO2 due to a sudden tube rupture	CLOSED	Affirmative defense granted; No penalty
10/10/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for CO due to malfunction of auxiliary burner	CLOSED	Affirmative defense granted; No penalty
11/15/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for SO2 due to combustion difficulties	CLOSED	Paid \$800 penalty

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
11/16/2005	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Exceedance of permitted limit for SO2 due to combustion difficulties	CLOSED	Paid \$800 penalty
04/20/2006	Union County New Jersey	PSD Permit NO.PCP010001 / Final Operating Permit No. BOP990001	NJDEP	NOV	Report to be submitted by June 1, 2006	Open	Extension requested
01/8/2002	Union County New Jersey	Permit No. RRF030001	NJDEP	NOV	Failure to apply for a permit renewal at least 90 days prior to expiration	CLOSED	No penalty assessed

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
11/7/97	Wallingford, CT	Solid Waste Permit to Operate No. 1480153	CT DEP	NOV	Storage of MSW in excess of 48 hours exceeding tipping floor plan	Closed	\$0
2/4/02	Wallingford, CT	Solid Waste Permit to Operate No. 1480153	CT DEP	NOV	Noncompliance with approved tipping floor plan: unauthorized volumes of waste transferred	Closed	\$0
2/22/02	Wallingford, CT	Air Permit No. 189- 0062	CT DEP	NOV	DEP observed failure to meet particulate emission limit during May 2001 stack testing.	Open	\$0
2/24/02	Wallingford, CT	Solid Waste Permit to Operate No. 1480153	CT DEP	NOV	Operating without a valid Solid Waste permit	Closed	\$0
3/26/03	Wallingford, CT	Solid Waste Permit to Operate No. 1480153	CT DEP	Consent Order	Interim operation of the facility continues in accordance with the Consent Order until a valid Solid Waste permit is issued by the DEP.	Open	Covanta = \$6250 CRRA = \$16200
11/4/04	Wallingford, CT	Title V Permit No. 189-0157-TV	CT DEP	NOV	NOV for two Title V minor recordkeeping violations.	Closed 11/10/04	\$0

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Date	Location	Permit/License/ EPA ID #	Issuing Agency	Type of Action	Nature of Violation	Disposition	Dollar Amount of Penalty
1/5/95	Warren Co	85012	NJDEP	Administrative Consent Order (ACO)	Air emissions events 1992-1994	Closed	\$25,200.00
3/3/95	Warren Co	85012	NJDEP	ACO	Air emissions events 3rd and 4th Qtr 1994	Closed	\$5,200.00
4/10/96	Warren Co	NJ0103853	NJDEP	NOV	Violation of discharge pH	Closed	\$1,000.00
9/23/96	Warren Co	NJ0103853	NJDEP	AONOCAPA	Failure to report overflow of sewage discharge within 2 hours	Closed	\$5,000.00
9/30/96	Warren Co		NJDEP	Penalty Invoice	Operator Licensing Act violations	Closed	\$1,000.00
12/10/96	Warren Co	85012	NJDEP	NOV	Emissions parameters	Rescinded	\$0.00
9/19/97	Warren Co	85012	NJPIRG vs WERC	Civil Action - Consent Decree	Emissions violations	Open	\$530,000.00
7/23/98	Warren Co	85012	NJDEP	NOV and AONOCAPA (10/5/98)	Air emissions events 3rd Qtr 1997	Closed	\$10,000.00
8/25/98	Warren Co	85012	NJDEP	ACO	Air emissions events	Closed	\$64,000.00
10/5/98	Warren Co	85012	NJDEP	ACO	Air emissions events	Closed	\$10,000.00
8/11/99	Warren Co	85012	NJDEP	ACO	Air emission events 1st Qtr 1998	Closed	\$2,800.00
8/30/99	Warren Co	85012	NJDEP	ACO	Air emission events 2nd Qtr 1998	Closed	\$10,000.00
12/15/99	Warren Co	85012	NJDEP	ACO	Air emission events 3rd Qtr 1998	Closed	\$2,400.00
2/17/00	Warren Co	85012	NJDEP	ACO	Air emission events 4th Qtr 1998	Closed	\$5,100.00
2/29/00	Warren Co	85012	NJDEP	ACO	Air emissions events 1st Qtr 1999	Closed	\$400.00
4/19/01	Warren Co	85012	NJDEP	NOV			
4/19/01	Warren Co	NJ0109151	NJDEP	NOV	Water Quality - failure to sample for TPH at East & West Basine	Satisfied	\$0.00
5/7/01	Warren Co	85012	NJDEP	ACO	Air emissions events 2nd Qtr 2000	Closed	\$4,400.00

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11/15/01	Warren Co	NJ0103853	NJDEP	NOV	Water Quality - exceeded monthly flow limit	No further Action	\$0.00
12/10/01	Warren Co	85012	NJDEP	ACO	Air emissions events 4th Qtr 2000	Closed	\$13,600.00
6/20/02	Warren Co	NJ0103853	NJDEP	NOV	Water Quality - Complainece Inspection Violation	Satisfied	\$0.00
6/12/03	Warren Co	85012	NJDEP	NOV	Water Quality - non-compliance with stormwater plan	Satisfied	
10/23/03	Warren Co	85012	NJDEP	ACO	Failure to file a timely Annual Solid Waste Utility Report for 2001	Closed	\$1,825.00
4/23/04	Warren Co	NJ0103853	NJDEP	ACO	Water Quality - non-compliance with stormwater plan	Rescinded 6/2004	\$0.00