



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHEAST REGIONAL OFFICE

MEMO

RE Covanta Delaware Valley, L. P.
1st, 2nd, 3rd and 4th Quarter 2009 and 1st Quarter 2010 CEMS Violations

TO Enforcement File

FROM Jillian Gallagher
Compliance Specialist 

THRU William Stroble
Operations Chief 

DATE August 20, 2010

Covanta owns and operates a resource recovery facility located at 10 Highland Avenue, City of Chester, Delaware County, which includes the operation of 6 municipal waste combustors under Title V Permit 23-00004.

Covanta's permit requires that Department approved CEMS shall be operated and maintained in accordance with the Department's "Continuous Source Monitoring Manual".

Covanta's permit also states that visible air contaminants from any combustor stack shall not be emitted in such a manner that the opacity of the emissions is equal to or greater than 10% for a period aggregating more than 3 minutes in any 1 hour; or equal to or greater than 30% at any time.

Their permit requires that the CEMS be maintained and operated to achieve the following data availability requirements:

- (1) CO and temperature: 100% valid hours per day, where a valid hour is defined as greater than or equal to 90% valid readings/hour (54 minutes);
- (2) Opacity, CO and Oxygen: Greater than or equal to 95% valid hours per day, where a valid hour is defined as greater than or equal to 75% valid readings per hour (45 minutes); and
- (3) Hydrochloric Acid, SOx and NOx: Greater than or equal to 90% valid hours per month, where a valid hour is defined as greater than or equal to 75% valid readings per hour (45 minutes).

On April 24, 2009, Covanta submitted its 1st Quarter 2009 CEMS report to the Department. The 1st Quarter 2009 CEMS report showed that Covanta did not achieve the opacity data availability requirements for MWI 4.

On July 28, 2009, Covanta submitted its 2nd Quarter 2009 CEMS report to the Department. The 2nd Quarter 2009 CEMS report showed that Covanta did not achieve the CO data availability requirements for MWI 1, 2, 3, 4, 5 and 6, opacity data availability requirements for MWI 1 and MWI 4, and temperature data availability requirements for MWI 3. The report also showed that on May 14, 2009, MWI 6 exceeded the opacity standard.

On October 26, 2009, Covanta submitted its 3rd Quarter 2009 CEMS report to the Department. The 3rd Quarter 2009 CEMS report showed that Covanta did not achieve the opacity data availability requirements for MWI 1, 2 and 5. In a December 8, 2009, Covanta requested the Department to waive the \$472 data availability penalty on MWI 3 and the \$417 data availability penalty on MWI 5 on April 21, 2009. A lightening strike occurred at approximately 9:00pm and caused damage to the opacity analyzers. Covanta replaced the opacity analyzer on MWI 3 by April 24, 2009 and on MWI 5 by April 23, 2009. The Department agreed to waive these two penalties.

On January 28, 2010, Covanta submitted its 4th Quarter 2009 CEMS report to the Department. The 4th Quarter 2009 CEMS report showed that Covanta did not achieve the CO data availability requirements for MWI 1, 2, 5 and 6.

On April 20, 2010, Covanta submitted its 1st Quarter 2010 CEMS report to the Department. The 1st Quarter 2010 CEMS report showed that Covanta did not achieve the opacity data availability requirements for MWI 1, 5 and 6.

The actions listed above and contrary to the Continuous Source Monitoring Manual and TVOP-23-00004 and therefore constitute violations of 25 Pa. Code § 127.444.

A proposed civil penalty of \$8,576 was calculated by Central Office using the "Air Quality Compliance Assurance Policy for Municipal Waste Incinerators". The penalty per quarter is listed in the table below. The proposed CACP was sent to the facility on August 2, 2010. The CACP was executed on August 17, 2010 and payment in full of \$8,576 was received on August 2, 2010. The case is now closed.

Year	Quarter	Violation	Penalty
2009	1st	DA	\$300.00
	2nd	DA & Op	\$4,500.00
	3rd	DA	\$905.00
	4th	DA	\$1,969.00
2010	1st	DA	\$902.00
Total:			\$8,576.00

Aug 12 '10



August 11, 2010

Ms. Jillian Gallagher
Air Quality Compliance Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, Pennsylvania 19401

Subject: Covanta Delaware Valley, L.P.
Delaware Valley Resource Recovery Facility (DVRRF)
1st - 4th Quarter 2009 and 1st Quarter 2010 CACP

Dear Ms. Gallagher:

Please find attached the signed Consent Assessment of Civil Penalty (CACP) for CEMS violations for the 1st - 4th Quarter 2009 and 1st Quarter 2010, Transmittal of Penalty Payment, and a settlement check for \$8,576.00.

If you have any questions regarding the above information, please feel free to contact me or Steve Jenness at (610) 497-8100.

Sincerely,



Timothy Grogan
Facility Manager

cc: Bill Stroble - DEP Southeast Regional Office
Heather Henry - DEP Southeast Regional Office
Joe Walsh - Covanta
File- Compliance Regulatory- Air

Gallagher, Jillian

CFACTS: 1801828

Viol: 593427

From: Gallagher, Jillian
Sent: Tuesday, June 02, 2009 8:31 AM
To: 'tgregan@covantaenergy.com'
Subject: Covanta Quarterly Emissions Report covering Quarter 1 of 2009

Dear Mr. Gregan:

Attached is a copy of the Quarterly Emissions Report covering Quarter 1 of 2009 for the Covanta Delaware Valley LP facility located in Chester, Delaware County. Based on the information submitted by Covanta Delaware Valley LP, penalties are indicated for violations identified in this report and summarized as follows:

Source	Violation type	Parameter	Units of Measure
MWI 4	data availability	Opacity	%

Please review the attached report for accuracy. Should you wish to discuss this report, contact me within two weeks of receipt. Otherwise, the Department will contact you regarding resolution of these violations.

Please verify the receipt of this e-mail since this is the first report sent to you instead of Mr. Bonner.

Sincerely,

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

QUARTERLY CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection
Bureau of Air Quality
Harrisburg, PA 17105-8468

The Bureau prepared this report based on the Continuous Source Monitoring System (CSMS) data submitted by the company. The Facility Summary appears below. The individual Continuous Source Monitoring System Reports contain summary and daily data and appear on the remaining pages.

If you have questions concerning the data summaries, please contact Charles J. Zadakis (717-772-3944 or czadakis@state.pa.us). If you have questions concerning the enforcement information, please contact Ronald G. Gray (717-772-4482 or rongray@state.pa.us). If you have questions concerning any case settlement matters, please contact Jillian Gallagher (484-250-7517 or JiGallaghe@state.pa.us) from your regional office.

FACILITY SUMMARY

Company: **Covanta Delaware Valley LP** Year: **2009**
Location: **Chester** Quarter: **1**
Region: **Southeast**

Monitored Parameter	Quarterly Average	Time Subject to Monitoring re Quarter	Emission Violation Days	Excess Invalid Averages	Report Penalties			Emission Result ID
					Emission	Data Availability	Late	

Source: MWI 1

Steam Flow	135.001	Klbs/hr	88.01 %	0	0	\$ 0	\$ 0	\$ 0	681
Temperature	2,381.94	Degrees F	88.01 %	0	0	\$ 0	\$ 0	\$ 0	478
Temperature-Bag	289.707	Degrees F	88.01 %	0	0	\$ 0	\$ 0	\$ 0	726
Source summary:			88.01 %	0	0	\$ 0	\$ 0	\$ 0	3

Source: MWI 2

Steam Flow	137.881	Klbs/hr	93.98 %	0	0	\$ 0	\$ 0	\$ 0	682
Temperature	2,419.08	Degrees F	93.98 %	0	0	\$ 0	\$ 0	\$ 0	481
Temperature-Bag	291.571	Degrees F	93.98 %	0	0	\$ 0	\$ 0	\$ 0	727
Source summary:			93.98 %	0	0	\$ 0	\$ 0	\$ 0	3

Source: MWI 3

Opacity	0.08856	%	91.67 %	0	0	\$ 0	\$ 0	\$ 0	605
Steam Flow	140.359	Klbs/hr	91.67 %	0	0	\$ 0	\$ 0	\$ 0	683
Temperature	2,361.61	Degrees F	91.62 %	0	0	\$ 0	\$ 0	\$ 0	485
Temperature-Bag	287.759	Degrees F	91.67 %	0	0	\$ 0	\$ 0	\$ 0	728
Source summary:			91.66 %	0	0	\$ 0	\$ 0	\$ 0	4

Source: MWI 4

Opacity	0.60977	%	90.37 %	0	1	\$ 0	\$ 300	\$ 0	607
Steam Flow	141.739	Klbs/hr	90.37 %	0	0	\$ 0	\$ 0	\$ 0	684
Temperature	2,368.18	Degrees F	90.37 %	0	0	\$ 0	\$ 0	\$ 0	488
Temperature-Bag	290.263	Degrees F	90.37 %	0	0	\$ 0	\$ 0	\$ 0	729
Source summary:			90.37 %	0	1	\$ 0	\$ 300	\$ 0	4

Source: MWI 5

Steam Flow	139.843	Klbs/hr	86.62 %	0	0	\$ 0	\$ 0	\$ 0	685
Temperature	2,361.42	Degrees F	86.62 %	0	0	\$ 0	\$ 0	\$ 0	492
Temperature-Bag	290.160	Degrees F	86.62 %	0	0	\$ 0	\$ 0	\$ 0	730

Bag									
Source summary:			86.62 %	0	0	\$ 0	\$ 0	\$ 0	3
Source: MWI 6									
Steam Flow	139.426	Klbs/hr	99.44 %	0	0	\$ 0	\$ 0	\$ 0	686
Temperature	2,425.98	Degrees F	99.44 %	0	0	\$ 0	\$ 0	\$ 0	495
Temperature-Bag	290.238	Degrees F	99.44 %	0	0	\$ 0	\$ 0	\$ 0	731
Source summary:			99.44%	0	0	\$ 0	\$ 0	\$ 0	3
Location summary:			91.61 %	0	1	\$ 0	\$ 300	\$ 0	20
Total Penalty:						\$ 300			

COMMENTS

The facility is in the process of changing over to new CEMSs equipment. The changes include the installation of new dry O2 analyzers at the inlet, new outlet analyzers on all six units, and new opacity analyzers on units 1,2,5,6. New dry O2 inlet analyzers and new outlet analyzers for Units 1,4,5 were installed during 4th quarter 2003; new outlet analyzers on Units 2, 3 & 6 were installed during the 2nd quarter 2004, and the Opacity analyzers were installed in the 3rd quarter 2003. The application for certification of the CEMSs have been submitted to the Department The new monitors have not yet been certified, therefore no data collected by these CEMSs was included in this report. Upon certification of the new CEMSs the Department will provide the instructions relative to data reporting back to the certification date.



Agree to
Unit #3 & 5 opacity

December 8, 2009

Ms. Jillian Gallagher
Air Quality Compliance Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, Pennsylvania 19401

Subject: Covanta Delaware Valley, L.P.
Delaware Valley Resource Recovery Facility (DVRRF)
Comments – 2nd Quarter 2009 Emissions Report

Ms. Gallagher:

Thank you for the opportunity to provide you comments on the 2nd Quarter 2009 Emissions Report. Our comments are grouped by operating unit or parameter.

Excess Emissions

Unit #1 (MWI 1)

None.

Unit #2 (MWI 2)

None.

Unit #3 (MWI 3)

None.

Unit #4 (MWI 4)

None.

Unit #5 (MWI 5)

None.

Unit #6 (MWI 6)

During baghouse maintenance on Unit #6, there were two instances on 5/14/09 where the outlet damper did not seal properly and resulted in two opacity excursions at 11:36 a.m. and 5:12 p.m. In order to eliminate such issues in the future, efforts have been employed via a standardized maintenance work permit to ensure that the dampers are properly sealed and the installation of a blank plate in front of the damper during online maintenance.

Data Availability

CO - Units #1 (MWI 1) - #6 (MWI 6)

There were several instances during the quarter where analyzer maintenance, malfunction and recalibration required analyzer downtime. The DVRRF does not contest any of these data availability events. To maximize data availability in the future, the DVRRF has procured and is already installing redundant CO analyzers at the inlet to the APC equipment to supplement the outlet analyzers during such events. We expect installation and performance testing to be complete by the end of December 2009.

Opacity - Units #1 (MWI 1), 3 (MWI 3), 4 (MWI 4), and 5 (MWI 5)

The data availability issue with Unit #1 involved a recalibration of the analyzer on 6/18/09 due to excessive drift. The issue with Unit #4 involved polling computer issues on 5/7/09 and 5/26/09. The DVRRF does not contest any of these data availability events.

A lightning strike at the facility at approximately 9:00 p.m. on 4/21/09 caused damage to the opacity analyzers on Units #3 and #5. The opacity analyzer on Unit #3 was repaired, recalibrated and placed back into service at approximately 10:00 a.m. on 4/24/09, resulting in approximately 59 hours of analyzer downtime. Similarly, the opacity analyzer on Unit #5 was repaired, recalibrated, and placed back in service at approximately 4:00 p.m. on 4/23/09, resulting in approximately 44 hours of analyzer downtime. Due to the unavoidable nature of this event, the DVRRF requests that the CEMS availability fines for the period involving this lightning strike event be waived.

Approved
[Signature]

To maximize data availability in the future, the DVRRF has recently installed three new opacity analyzers on Units #2, 3, and 4 in October and November 2009. Additional work to replace the blower and heating systems on all six units is expected in December 2009.

Combustion Temperature - Unit #3 (MWI 3)

Computer polling and clock synchronization problems on 5/5/09-5/7/09 resulted in intermittent loss of 1-minute data on Unit #3. The polling and clock issues were resolved on 5/8/09.

If you have any questions regarding the above information, please feel free to contact me or Steve Jenness at (610) 497-8100.

Sincerely,

[Signature]

Timothy Grogan
Facility Manager

cc: Bill Stroble - DEP Southeast Regional Office
Heather Henry - DEP Southeast Regional Office
Joe Walsh - Covanta
File- Compliance Regulatory- Air

eFACTS : 1845871
593428 - 593433

Gallagher, Jillian

From: Gallagher, Jillian
Sent: Monday, November 30, 2009 12:02 PM
To: 'tgregan@covantaenergy.com'
Subject: RE: Covanta Quarterly Emissions Report covering Quarter 2 of 2009

Dear Mr. Grogan:

Attached is a copy of the Quarterly Emissions Report covering Quarter 2 of 2009 for the Covanta Delaware Valley LP facility located in Chester, Delaware County. Based on the information submitted by Covanta Delaware Valley LP, penalties are indicated for violations identified in this report and summarized as follows:

Source	Violation type	Parameter	Units of Measure
MWI 1	data availability	CO	ppm
MWI 1	data availability	Opacity	%
MWI 2	data availability	CO	ppm
MWI 3	data availability	CO	ppm
MWI 3	data availability	Opacity	%
MWI 3	data availability	Temperature	Degrees F
MWI 4	data availability	CO	ppm
MWI 4	data availability	Opacity	%
MWI 5	data availability	CO	ppm
MWI 5	data availability	Opacity	%
MWI 6	data availability	CO	ppm
MWI 6	emission	Opacity	%

Please review the attached report for accuracy. Should you wish to discuss this report, contact me within two weeks of receipt. Otherwise, the Department will contact you regarding resolution of these violations.

Sincerely,

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

QUARTERLY CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection
Bureau of Air Quality
Harrisburg, PA 17105-8468

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FACILITY SUMMARY

Company: **Covanta Delaware Valley LP** Year: **2009**
Location: **Chester** Quarter: **2**
Region: **Southeast**

Monitored Parameter	Quarterly Average	Time Subject to Monitoring re Quarter	Emission Violation Days	Excess Invalid Averages	Report Penalties			Emission Result ID
					Emission	Data Availability	Late	

Source: **MWI 1**

CO	46.65	ppm	97.16 %	0	77	\$ 0	\$ 831	\$ 0	536
HCl	1.04	ppm	97.21 %	0	0	\$ 0	\$ 0	\$ 0	581
NOx	104.87	ppm	97.21 %	0	0	\$ 0	\$ 0	\$ 0	592
Opacity	0.03169	%	97.25 %	0	1	\$ 0	\$ 300	\$ 0	601
SO2	9.57	ppm	97.21 %	0	0	\$ 0	\$ 0	\$ 0	566
Steam Flow	135.696	Klbs/hr	97.25 %	0	0	\$ 0	\$ 0	\$ 0	681
Temperature	2,398.78	Degrees F	97.21 %	0	0	\$ 0	\$ 0	\$ 0	478
Temperature-Bag	290.441	Degrees F	97.25 %	0	0	\$ 0	\$ 0	\$ 0	726
Source summary:			97.22 %	0	78	\$ 0	\$ 1,131	\$ 0	8

Source: **MWI 2**

CO	29.85	ppm	95.10 %	0	18	\$ 0	\$ 471	\$ 0	538
HCl	2.98	ppm	95.33 %	0	0	\$ 0	\$ 0	\$ 0	583
NOx	118.68	ppm	95.33 %	0	0	\$ 0	\$ 0	\$ 0	593
Opacity	0.24943	%	95.38 %	0	0	\$ 0	\$ 0	\$ 0	603
SO2	10.62	ppm	95.33 %	0	0	\$ 0	\$ 0	\$ 0	570
Steam Flow	131.336	Klbs/hr	95.42 %	0	0	\$ 0	\$ 0	\$ 0	682
Temperature	2,358.21	Degrees F	95.38 %	0	0	\$ 0	\$ 0	\$ 0	481
Temperature-Bag	293.461	Degrees F	95.42 %	0	0	\$ 0	\$ 0	\$ 0	727
Source summary:			95.34 %	0	18	\$ 0	\$ 471	\$ 0	8

Source: **MWI 3**

CO	30.51	ppm	97.07 %	0	22	\$ 0	\$ 490	\$ 0	540
HCl	0.50	ppm	97.16 %	0	0	\$ 0	\$ 0	\$ 0	585
NOx	138.67	ppm	97.16 %	0	0	\$ 0	\$ 0	\$ 0	594
Opacity	0.60964	%	97.16 %	0	56	\$ 0	\$ 471	\$ 0	605
SO2	9.87	ppm	97.16 %	0	0	\$ 0	\$ 0	\$ 0	573
Steam Flow	137.518	Klbs/hr	97.16 %	0	0	\$ 0	\$ 0	\$ 0	683
Temperature	2,373.80	Degrees F	97.16 %	0	24	\$ 0	\$ 499	\$ 0	485
Temperature-Bag	288.239	Degrees F	97.16 %	0	0	\$ 0	\$ 0	\$ 0	728

Source summary:	97.15 %	0	102	\$ 0	\$ 1,461	\$ 0	8
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Source: MWI 4

CO	52.90	ppm	96.20 %	0	26	\$ 0	\$ 509	\$ 0	542
HCl	1.04	ppm	96.29 %	0	0	\$ 0	\$ 0	\$ 0	587
NOx	135.66	ppm	96.29 %	0	0	\$ 0	\$ 0	\$ 0	595
Opacity	0.75539	%	96.34 %	0	3	\$ 0	\$ 305	\$ 0	607
SO2	18.38	ppm	96.29 %	0	0	\$ 0	\$ 0	\$ 0	575
Steam Flow	135.396	Klbs/hr	96.34 %	0	0	\$ 0	\$ 0	\$ 0	684
Temperature	2,355.07	Degrees F	96.38 %	0	0	\$ 0	\$ 0	\$ 0	488
Temperature-Bag	289.540	Degrees F	96.34 %	0	0	\$ 0	\$ 0	\$ 0	729
Source summary:			96.31 %	0	29	\$ 0	\$ 814	\$ 0	8

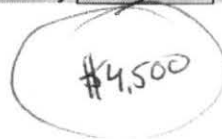
Source: MWI 5

CO	49.21	ppm	95.33 %	0	11	\$ 0	\$ 440	\$ 0	545
HCl	1.13	ppm	95.38 %	0	0	\$ 0	\$ 0	\$ 0	589
NOx	115.08	ppm	95.38 %	0	0	\$ 0	\$ 0	\$ 0	597
Opacity	0.33787	%	95.38 %	0	41	\$ 0	\$ 417	\$ 0	609
SO2	12.57	ppm	95.38 %	0	0	\$ 0	\$ 0	\$ 0	577
Steam Flow	136.105	Klbs/hr	95.38 %	0	0	\$ 0	\$ 0	\$ 0	685
Temperature	2,365.99	Degrees F	95.38 %	0	0	\$ 0	\$ 0	\$ 0	492
Temperature-Bag	290.222	Degrees F	95.38 %	0	0	\$ 0	\$ 0	\$ 0	730
Source summary:			95.37 %	0	52	\$ 0	\$ 858	\$ 0	8

Source: MWI 6

CO	54.45	ppm	94.05 %	0	14	\$ 0	\$ 453	\$ 0	547
HCl	1.98	ppm	94.05 %	0	0	\$ 0	\$ 0	\$ 0	591
NOx	147.51	ppm	94.05 %	0	0	\$ 0	\$ 0	\$ 0	599
Opacity	0.39329	%	94.09 %	1	0	\$ 200	\$ 0	\$ 0	611
SO2	11.94	ppm	94.05 %	0	0	\$ 0	\$ 0	\$ 0	579
Steam Flow	129.069	Klbs/hr	94.09 %	0	0	\$ 0	\$ 0	\$ 0	686
Temperature	2,365.59	Degrees F	94.09 %	0	0	\$ 0	\$ 0	\$ 0	495
Temperature-Bag	289.467	Degrees F	94.09 %	0	0	\$ 0	\$ 0	\$ 0	731
Source summary:			94.07%	1	14	\$ 200	\$ 453	\$ 0	8

Location summary:	95.91 %	1	293	\$ 200	\$ 5,189	\$ 0	48
Total Penalty:				\$ 5,389			


\$4,300

MAR 22 '10

COVANTA

DELAWARE VALLEY

March 19, 2010

Ms. Jillian Gallagher
Air Quality Compliance Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, Pennsylvania 19401

Subject: Covanta Delaware Valley, L.P.
Delaware Valley Resource Recovery Facility (DVRRF)
Comments – 3rd Quarter 2009 Emissions Report

Ms. Gallagher:

Thank you for the opportunity to provide you comments on the 3rd Quarter 2009 Emissions Report. Our comments are grouped by operating unit or parameter.

Excess Emissions

Unit #1 (MWI 1)

None.

Unit #2 (MWI 2)

None.

Unit #3 (MWI 3)

None.

Unit #4 (MWI 4)

None.

Unit #5 (MWI 5)

None.

Unit #6 (MWI 6)

None.

Data Availability

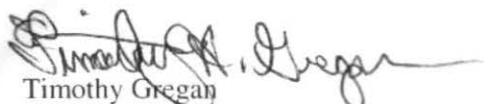
Opacity - Units #1 (MWI 1), 2 (MWI 2), and 5 (MWI 5)

The data availability issue with Units #1 and #2 on 9/27/09 involved excessive analyzer drift that required servicing and recalibration before placing them back into service. Approximately 3 hours of downtime for Unit #1 and 2 hours of downtime for Unit #2 were the result.

One 8/8/09, elevated opacity readings on Unit #5 determined not to be process related required technician support. Upon investigation it was determined that debris had accumulated in the analyzer light path. The optics were cleaned and the analyzer was placed back into service. Approximately 3 hours of downtime were recorded.

If you have any questions regarding the above information, please feel free to contact me or Steve Jenness at (610) 497-8100.

Sincerely,


Timothy Grogan
Facility Manager

cc: Bill Stroble – DEP Southeast Regional Office
Heather Henry – DEP Southeast Regional Office
Joe Walsh - Covanta
File- Compliance Regulatory- Air

Gallagher, Jillian

eFACTS: 1867732

From: Gallagher, Jillian
Sent: Monday, March 08, 2010 3:40 PM
To: 'Jenness, Steve'
Subject: RE: 3rd Qtr 2009 Emissions Report

Revised

viol: 593434-593436

Steve,

Attached is the revised 3rd Quarter 2009 Emission Report. Thank you again for observing that error and I apologize for the inconvenience. Based on the information submitted by Covanta Delaware Valley LP, penalties are indicated for violations identified in this report and summarized as follows:

Source	Violation type	Parameter	Units of Measure
MWI 1	data availability	Opacity	%
MWI 2	data availability	Opacity	%
MWI 5	data availability	Opacity	%

Please review the report for accuracy. Should you wish to discuss this report, contact me within two weeks of receipt. Otherwise, the Department will contact you regarding resolution of these violations.

Sincerely,

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

-----Original Message-----

From: Jenness, Steve [mailto:SJenness@CovantaEnergy.com]
Sent: Friday, February 26, 2010 4:42 PM
To: Gallagher, Jillian
Subject: RE: 3rd Qtr 2009 Emissions Report

Thanks Jillian. Have a great weekend!

Steve Jenness
Environmental Engineer

COVANTA
Energy
for a Cleaner World

Covanta Delaware Valley, LP
10 Highland Avenue
Chester, PA 19013
(610) 497-8150 Fax: (610) 497-8042 Cell: (301) 461-2241

Covanta Lancaster, Inc.
1911 River Road
Bainbridge, PA 17502
(717) 426-4938 Fax: (717) 426-1970

From: Gallagher, Jillian [mailto:jgallaghe@state.pa.us]

3/8/2010

Sent: Friday, February 26, 2010 2:51 PM
To: Jenness, Steve
Subject: RE: 3rd Qtr 2009 Emissions Report

Steve,

I've received word that the report should be re-run sometime next week. I'll forward it to you when I get it.

Thanks!

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

-----Original Message-----

From: Jenness, Steve [mailto:SJenness@CovantaEnergy.com]
Sent: Wednesday, February 03, 2010 9:24 AM
To: Gallagher, Jillian
Cc: Gregan, Tim
Subject: RE: 3rd Qtr 2009 Emissions Report

Jillian, I appreciate the update.

Thanks!

Steve Jenness
Environmental Engineer

COVANTA
Energy
for a Cleaner World

Covanta Delaware Valley, LP
10 Highland Avenue
Chester, PA 19013
(610) 497-8150 Fax: (610) 497-8042 Cell: (301) 461-2241

Covanta Lancaster, Inc.
1911 River Road
Bainbridge, PA 17502
(717) 426-4938 Fax: (717) 426-1970

From: Gallagher, Jillian [mailto:jigallaghe@state.pa.us]
Sent: Wednesday, February 03, 2010 8:44 AM
To: Jenness, Steve
Subject: RE: 3rd Qtr 2009 Emissions Report

Steve,

Just a quick update. Central Office staff have taken care of the programming error. The next step is for them to run "supplemental" reports which shows the correct information. I'm not sure when that will take place, but will keep you informed. Thanks for picking up that error!

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office

3/8/2010

2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

-----Original Message-----

From: Jenness, Steve [mailto:SJenness@CovantaEnergy.com]
Sent: Wednesday, January 27, 2010 3:41 PM
To: Gallagher, Jillian
Subject: RE: 3rd Qtr 2009 Emissions Report

Thanks Jillian! I would rather not take exceedances that I don't need to.

Steve Jenness
Environmental Engineer

COVANTA
Energy
for a Cleaner World

Covanta Delaware Valley, LP
10 Highland Avenue
Chester, PA 19013
(610) 497-8150 Fax: (610) 497-8042 Cell: (301) 461-2241

Covanta Lancaster, Inc.
1911 River Road
Bainbridge, PA 17502
(717) 426-4938 Fax: (717) 426-1970

From: Gallagher, Jillian [mailto:jgallaghe@state.pa.us]
Sent: Wednesday, January 27, 2010 3:26 PM
To: Jenness, Steve
Subject: RE: 3rd Qtr 2009 Emissions Report

Steve,

It appears as if you are correct. Central Office will be spending some time fixing the problem. I will let you know when I hear more.

Thanks!

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

-----Original Message-----

From: Jenness, Steve [mailto:SJenness@CovantaEnergy.com]
Sent: Wednesday, January 27, 2010 12:57 PM
To: Gallagher, Jillian
Subject: RE: 3rd Qtr 2009 Emissions Report

Thanks Jillian.

Steve Jenness
Environmental Engineer

COVANTA

Energy
for a Cleaner World

Covanta Delaware Valley, LP
10 Highland Avenue
Chester, PA 19013
(610) 497-8150 Fax: (610) 497-8042 Cell: (301) 461-2241

Covanta Lancaster, Inc.
1911 River Road
Bainbridge, PA 17502
(717) 426-4938 Fax: (717) 426-1970

From: Gallagher, Jillian [mailto:jigallaghe@state.pa.us]
Sent: Wednesday, January 27, 2010 10:46 AM
To: Jenness, Steve
Subject: RE: 3rd Qtr 2009 Emissions Report

Steve,

I have forwarded your e-mail onto our Central Office staff. I will let you know what I hear or someone from Harrisburg will contact you directly.

Thanks! Jillian

-----Original Message-----

From: Jenness, Steve [mailto:SJenness@CovantaEnergy.com]
Sent: Wednesday, January 27, 2010 10:37 AM
To: Gallagher, Jillian
Cc: Gregan, Tim; Piscitelli, Alex
Subject: RE: 3rd Qtr 2009 Emissions Report

Thanks Jillian. I do have one issue with the report regarding SO2. It appears that the report was run using 24-hr arithmetic averages instead of the 24-hr geometric averages that our permit states. I have attached both hand calculated and DAS-generated reports for these two days which indicate compliance with the 80% removal efficiency limit. Could you please check with the Central Office on this? I believe that they will need to rerun the reports using geometric averages.

Thanks!

Steve Jenness
Environmental Engineer

COVANTA
Energy
for a Cleaner World

Covanta Delaware Valley, LP
10 Highland Avenue
Chester, PA 19013
(610) 497-8150 Fax: (610) 497-8042 Cell: (301) 461-2241

Covanta Lancaster, Inc.
1911 River Road
Bainbridge, PA 17502
(717) 426-4938 Fax: (717) 426-1970

From: Gallagher, Jillian [mailto:jigallaghe@state.pa.us]
Sent: Wednesday, January 27, 2010 9:14 AM
To: Jenness, Steve
Subject: 3rd Qtr 2009 Emissions Report

Mr. Jenness,

3/8/2010

Attached is a copy of the Quarterly Emissions Report covering Quarter 3 of 2009 for the Covanta Delaware Valley LP facility located in Chester, Delaware County. Based on the information submitted by Covanta Delaware Valley LP, penalties are indicated for violations identified in this report and summarized as follows:

Source	Violation type	Parameter	Units of Measure
MWI 1	data availability	Opacity	%
MWI 2	data availability	Opacity	%
MWI 4	emission	SO2	ppm
MWI 5	data availability	Opacity	%

Please review the attached report for accuracy. Should you wish to discuss this report, contact me within two weeks of receipt. Otherwise, the Department will contact you regarding resolution of these violations.

Sincerely,

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

QUARTERLY CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection
Bureau of Air Quality
Harrisburg, PA 17105-8468

The Bureau prepared this report based on the Continuous Source Monitoring System (CSMS) data submitted by the company. The Facility Summary appears below. The individual Continuous Source Monitoring System Reports contain summary and daily data and appear on the remaining pages.

If you have questions concerning the data summaries, please contact Charles J. Zadakis (717-772-3944 or czadakis@state.pa.us). If you have questions concerning the enforcement information, please contact Ronald G. Gray (717-772-4482 or rongray@state.pa.us). If you have questions concerning any case settlement matters, please contact Jillian Gallagher (484-250-7517 or JiGallaghe@state.pa.us) from your regional office.

FACILITY SUMMARY

Company: **Covanta Delaware Valley LP** Year: **2009**
Location: **Chester** Quarter: **3**
Region: **Southeast**

Monitored Parameter	Quarterly Average	Time Subject to Monitoring re Quarter	Emission Violation Days	Excess Invalid Averages	Report Penalties			Emission Result ID
					Emission	Data Availability	Late	

Source: **MWI 1**

CO	48.41	ppm	97.60 %	0	0	\$ 0	\$ 0	\$ 0	536
HCl	1.13	ppm	97.60 %	0	0	\$ 0	\$ 0	\$ 0	581
NOx	113.42	ppm	97.60 %	0	0	\$ 0	\$ 0	\$ 0	592
Opacity	0.05586	%	97.55 %	0	2	\$ 0	\$ 302	\$ 0	601
SO2	16.13	ppm	97.60 %	0	0	\$ 0	\$ 0	\$ 0	566
Steam Flow	140.248	Klbs/hr	97.55 %	0	0	\$ 0	\$ 0	\$ 0	681
Temperature	2,456.51	Degrees F	97.60 %	0	0	\$ 0	\$ 0	\$ 0	478
Temperature-Bag	290.768	Degrees F	97.55 %	0	0	\$ 0	\$ 0	\$ 0	726
Source summary:			97.58 %	0	2	\$ 0	\$ 302	\$ 0	8

Source: **MWI 2**

CO	25.32	ppm	96.06 %	0	0	\$ 0	\$ 0	\$ 0	538
HCl	2.96	ppm	96.15 %	0	0	\$ 0	\$ 0	\$ 0	583
NOx	124.54	ppm	96.15 %	0	0	\$ 0	\$ 0	\$ 0	593
Opacity	0.25050	%	96.15 %	0	1	\$ 0	\$ 300	\$ 0	603
SO2	12.55	ppm	96.15 %	0	0	\$ 0	\$ 0	\$ 0	570
Steam Flow	132.883	Klbs/hr	96.20 %	0	0	\$ 0	\$ 0	\$ 0	682
Temperature	2,415.99	Degrees F	96.20 %	0	0	\$ 0	\$ 0	\$ 0	481
Temperature-Bag	292.737	Degrees F	96.20 %	0	0	\$ 0	\$ 0	\$ 0	727
Source summary:			96.16 %	0	1	\$ 0	\$ 300	\$ 0	8

Source: **MWI 3**

CO	38.80	ppm	97.60 %	0	0	\$ 0	\$ 0	\$ 0	540
HCl	0.97	ppm	97.64 %	0	0	\$ 0	\$ 0	\$ 0	585
NOx	120.71	ppm	97.64 %	0	0	\$ 0	\$ 0	\$ 0	594
Opacity	0.19077	%	97.64 %	0	0	\$ 0	\$ 0	\$ 0	605
SO2	13.97	ppm	97.64 %	0	0	\$ 0	\$ 0	\$ 0	573
Steam Flow	139.718	Klbs/hr	97.64 %	0	0	\$ 0	\$ 0	\$ 0	683
Temperature	2,427.78	Degrees F	97.64 %	0	0	\$ 0	\$ 0	\$ 0	485
Temperature-Bag	288.868	Degrees F	97.64 %	0	0	\$ 0	\$ 0	\$ 0	728

Source summary:	97.64 %	0	0	\$ 0	\$ 0	\$ 0	8
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Source: MWI 4

CO	46.31	ppm	97.33 %	0	0	\$ 0	\$ 0	\$ 0	542
HCl	1.00	ppm	97.37 %	0	0	\$ 0	\$ 0	\$ 0	587
NOx	138.28	ppm	97.37 %	0	0	\$ 0	\$ 0	\$ 0	595
Opacity	0.25895	%	97.46 %	0	0	\$ 0	\$ 0	\$ 0	607
SO2	25.17	ppm	97.37 %	0	0	\$ 0	\$ 0	\$ 0	575
Steam Flow	138.189	Klbs/hr	97.46 %	0	0	\$ 0	\$ 0	\$ 0	684
Temperature	2,432.93	Degrees F	97.46 %	0	0	\$ 0	\$ 0	\$ 0	488
Temperature-Bag	288.504	Degrees F	97.46 %	0	0	\$ 0	\$ 0	\$ 0	729
Source summary:	97.41 %			0	0	\$ 0	\$ 0	\$ 0	8

Source: MWI 5

CO	52.75	ppm	97.78 %	0	0	\$ 0	\$ 0	\$ 0	545
HCl	0.78	ppm	97.78 %	0	0	\$ 0	\$ 0	\$ 0	589
NOx	120.74	ppm	97.78 %	0	0	\$ 0	\$ 0	\$ 0	597
Opacity	0.20335	%	97.78 %	0	2	\$ 0	\$ 302	\$ 0	609
SO2	21.50	ppm	97.78 %	0	0	\$ 0	\$ 0	\$ 0	577
Steam Flow	130.451	Klbs/hr	97.78 %	0	0	\$ 0	\$ 0	\$ 0	685
Temperature	2,386.14	Degrees F	97.78 %	0	0	\$ 0	\$ 0	\$ 0	492
Temperature-Bag	290.225	Degrees F	97.78 %	0	0	\$ 0	\$ 0	\$ 0	730
Source summary:	97.78 %			0	2	\$ 0	\$ 302	\$ 0	8

Source: MWI 6

CO	34.22	ppm	95.56 %	0	0	\$ 0	\$ 0	\$ 0	547
HCl	0.76	ppm	95.56 %	0	0	\$ 0	\$ 0	\$ 0	591
NOx	148.37	ppm	95.56 %	0	0	\$ 0	\$ 0	\$ 0	599
Opacity	0.51799	%	95.56 %	0	0	\$ 0	\$ 0	\$ 0	611
SO2	14.06	ppm	95.56 %	0	0	\$ 0	\$ 0	\$ 0	579
Steam Flow	132.650	Klbs/hr	95.56 %	0	0	\$ 0	\$ 0	\$ 0	686
Temperature	2,425.47	Degrees F	95.52 %	0	0	\$ 0	\$ 0	\$ 0	495
Temperature-Bag	289.774	Degrees F	95.56 %	0	0	\$ 0	\$ 0	\$ 0	731
Source summary:	95.56%			0	0	\$ 0	\$ 0	\$ 0	8

Location summary:	97.02 %	0	5	\$ 0	\$ 905	\$ 0	48
Total Penalty:				\$ 905			

COMMENTS

This report replaces the version created on 11/20/09 to correct for geometric averages for SO2 monitors.

Gallagher, Jillian

From: Gallagher, Jillian
Sent: Friday, July 23, 2010 9:23 AM
To: 'Jenness, Steve'
Subject: 4th Quarter 2009 and 1st Quarter 2010 CEMS Reports

Steve,

Attached are copies of the Quarterly Emissions Reports covering Quarter 4 of 2009 and Quarter 1 of 2010 for the Covanta Delaware Valley LP facility located in Chester, Delaware County. Based on the information submitted by Covanta Delaware Valley LP, penalties are indicated for violations identified in this report and summarized as follows:

4th Quarter 2009

Source	Violation type	Parameter	Units of Measure
MWI 1	data availability	CO	ppm
MWI 2	data availability	CO	ppm
MWI 5	data availability	CO	ppm
MWI 6	data availability	CO	ppm

1st Quarter 2010

Source	Violation type	Parameter	Units of Measure
MWI 1	data availability	Opacity	%
MWI 5	data availability	Opacity	%
MWI 6	data availability	Opacity	%

Please review the attached reports for accuracy. Should you wish to discuss these reports, please contact me within two weeks of receipt. Otherwise, the Department will contact you regarding resolution of these violations.

Sincerely,

Jillian Gallagher | Air Quality Compliance Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.7517 | Fax: 484.250.5920
www.depweb.state.pa.us

7/23/2010

eFACTS: 1899954
Viol: 593439-593442

QUARTERLY CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection
Bureau of Air Quality
Harrisburg, PA 17105-8468

The Bureau prepared this report based on the Continuous Source Monitoring System (CSMS) data submitted by the company. The Facility Summary appears below. The individual Continuous Source Monitoring System Reports contain summary and daily data and appear on the remaining pages.

If you have questions concerning the data summaries, please contact Charles J. Zadakis (717-772-3944 or czadakis@state.pa.us). If you have questions concerning the enforcement information, please contact Ronald G. Gray (717-772-4482 or rongray@state.pa.us). If you have questions concerning any case settlement matters, please contact Jillian Gallagher (484-250-7517 or JiGallaghe@state.pa.us) from your regional office.

FACILITY SUMMARY

Company: **Covanta Delaware Valley LP** Year: **2009**
Location: **Chester** Quarter: **4**
Region: **Southeast**

Monitored Parameter	Quarterly Average	Time Subject to Monitoring re Quarter	Emission Violation Days	Excess Invalid Averages	Report Penalties			Emission Result ID
					Emission	Data Availability	Late	

Source: **MWI 1**

CO	34.82	ppm	94.34 %	0	24	\$ 0	\$ 499	\$ 0	536
HCl	0.68	ppm	94.34 %	0	0	\$ 0	\$ 0	\$ 0	581
NOx	117.17	ppm	94.34 %	0	0	\$ 0	\$ 0	\$ 0	592
Opacity	0.27679	%	94.34 %	0	0	\$ 0	\$ 0	\$ 0	601
SO2	16.03	ppm	94.34 %	0	0	\$ 0	\$ 0	\$ 0	566
Steam Flow	138.638	Klbs/hr	94.34 %	0	0	\$ 0	\$ 0	\$ 0	681
Temperature	2,432.03	Degrees F	94.34 %	0	0	\$ 0	\$ 0	\$ 0	478
Temperature-Bag	290.688	Degrees F	94.34 %	0	0	\$ 0	\$ 0	\$ 0	726
Source summary:			94.34 %	0	24	\$ 0	\$ 499	\$ 0	8

Source: **MWI 2**

CO	31.94	ppm	86.46 %	0	20	\$ 0	\$ 480	\$ 0	538
HCl	2.91	ppm	86.46 %	0	0	\$ 0	\$ 0	\$ 0	583
NOx	123.41	ppm	86.46 %	0	0	\$ 0	\$ 0	\$ 0	593
SO2	20.93	ppm	86.46 %	0	0	\$ 0	\$ 0	\$ 0	570
Steam Flow	132.964	Klbs/hr	86.46 %	0	0	\$ 0	\$ 0	\$ 0	682
Temperature	2,378.63	Degrees F	86.46 %	0	0	\$ 0	\$ 0	\$ 0	481
Temperature-Bag	290.952	Degrees F	86.46 %	0	0	\$ 0	\$ 0	\$ 0	727
Source summary:			86.46 %	0	20	\$ 0	\$ 480	\$ 0	7

Source: **MWI 3**

CO	36.39	ppm	94.97 %	0	0	\$ 0	\$ 0	\$ 0	540
HCl	0.32	ppm	94.97 %	0	0	\$ 0	\$ 0	\$ 0	585
NOx	130.12	ppm	94.97 %	0	0	\$ 0	\$ 0	\$ 0	594
SO2	15.99	ppm	94.97 %	0	0	\$ 0	\$ 0	\$ 0	573
Steam Flow	133.894	Klbs/hr	94.93 %	0	0	\$ 0	\$ 0	\$ 0	683
Temperature	2,419.34	Degrees F	94.97 %	0	0	\$ 0	\$ 0	\$ 0	485
Temperature-Bag	288.118	Degrees F	94.93 %	0	0	\$ 0	\$ 0	\$ 0	728
Source summary:			94.96 %	0	0	\$ 0	\$ 0	\$ 0	7

Source: MWI 4

CO	35.21	ppm	96.78 %	0	0	\$ 0	\$ 0	\$ 0	542
HCl	0.42	ppm	96.78 %	0	0	\$ 0	\$ 0	\$ 0	587
NOx	124.04	ppm	96.78 %	0	0	\$ 0	\$ 0	\$ 0	595
SO2	15.47	ppm	96.78 %	0	0	\$ 0	\$ 0	\$ 0	575
Steam Flow	131.167	Klbs/hr	96.78 %	0	0	\$ 0	\$ 0	\$ 0	684
Temperature	2,423.36	Degrees F	96.78 %	0	0	\$ 0	\$ 0	\$ 0	488
Temperature-Bag	288.950	Degrees F	96.78 %	0	0	\$ 0	\$ 0	\$ 0	729
Source summary:			96.78 %	0	0	\$ 0	\$ 0	\$ 0	7

Source: MWI 5

CO	40.19	ppm	94.02 %	0	28	\$ 0	\$ 519	\$ 0	545
HCl	0.91	ppm	94.02 %	0	0	\$ 0	\$ 0	\$ 0	589
NOx	115.20	ppm	94.02 %	0	0	\$ 0	\$ 0	\$ 0	597
Opacity	0.17820	%	94.02 %	0	0	\$ 0	\$ 0	\$ 0	609
SO2	19.86	ppm	94.02 %	0	0	\$ 0	\$ 0	\$ 0	577
Steam Flow	134.579	Klbs/hr	94.02 %	0	0	\$ 0	\$ 0	\$ 0	685
Temperature	2,398.26	Degrees F	94.02 %	0	0	\$ 0	\$ 0	\$ 0	492
Temperature-Bag	289.586	Degrees F	94.02 %	0	0	\$ 0	\$ 0	\$ 0	730
Source summary:			94.02 %	0	28	\$ 0	\$ 519	\$ 0	8

Source: MWI 6

CO	50.81	ppm	85.73 %	0	18	\$ 0	\$ 471	\$ 0	547
HCl	0.65	ppm	85.73 %	0	0	\$ 0	\$ 0	\$ 0	591
NOx	127.23	ppm	85.73 %	0	0	\$ 0	\$ 0	\$ 0	599
Opacity	0.45312	%	85.78 %	0	0	\$ 0	\$ 0	\$ 0	611
SO2	18.67	ppm	85.73 %	0	0	\$ 0	\$ 0	\$ 0	579
Steam Flow	133.940	Klbs/hr	85.78 %	0	0	\$ 0	\$ 0	\$ 0	686
Temperature	2,360.15	Degrees F	85.73 %	0	0	\$ 0	\$ 0	\$ 0	495
Temperature-Bag	289.591	Degrees F	85.78 %	0	0	\$ 0	\$ 0	\$ 0	731
Source summary:			85.75%	0	18	\$ 0	\$ 471	\$ 0	8

Location summary:			92.01 %	0	90	\$ 0	\$ 1,969	\$ 0	45
Total Penalty:						\$ 1,969			

COMMENTS

The Opacity analyzers for Units 2, 3 and 4 were replaced during the 4th Quarter 2009 and have not received final certification; they are not included in this report summary.

CONTINUOUS SOURCE MONITORING SYSTEM REPORT

Department of Environmental Protection
Bureau of Air Quality

Company: **Covanta Delaware Valley LP**
Location: **Chester**
Region: **Southeast**

Year: **2009**
Quarter: **4**

Source: **MWI 1** **CO (ppm)** Emission Result ID: **536** Certification: **01/01/2004**

SUMMARY INFORMATION

OPERATION

Time subject to monitoring:	2083	hours or	94.34 %	of quarter
Valid CSMS time:	2059	hours or	93.25 %	of quarter
% Valid of time subject to monitoring:	98.85 %		Parameter average:	34.82 ppm

COMPLIANCE

Report submittal postmark: **01/28/2010**

Emission Standard:

1-day average, block $\leq$ **100 ppm CO**

Report indicates compliance with emission standard

Data Availability Standard:

Valid hours/quarter = **100 %**
Excess invalid hours: **24 hours**

ENFORCEMENT

"Air Quality Compliance Assurance Policy for Municipal Waste Incinerators", July 1989, applies, as well as the "March 1995 Minor Revisions" to the same.

Penalties:

(Penalty Factor: **2**)

Data Availability \$ 499

Total: \$ 499

eFACTS: 1899953 ✓ 101: 593443-593445

QUARTERLY CONTINUOUS SOURCE MONITORING REPORT

Department of Environmental Protection
Bureau of Air Quality
Harrisburg, PA 17105-8468

The Bureau prepared this report based on the Continuous Source Monitoring System (CSMS) data submitted by the company. The Facility Summary appears below. The individual Continuous Source Monitoring System Reports contain summary and daily data and appear on the remaining pages.

If you have questions concerning the data summaries, please contact Charles J. Zadakis (717-772-3944 or czadakis@state.pa.us). If you have questions concerning the enforcement information, please contact Ronald G. Gray (717-772-4482 or rongray@state.pa.us). If you have questions concerning any case settlement matters, please contact Jillian Gallagher (484-250-7517 or JiGallaghe@state.pa.us) from your regional office.

FACILITY SUMMARY

Company: **Covanta Delaware Valley LP** Year: **2010**
Location: **Chester** Quarter: **1**
Region: **Southeast**

Monitored Parameter	Quarterly Average	Time Subject to Monitoring re Quarter	Emission Violation Days	Excess Invalid Averages	Report Penalties			Emission Result ID
					Emission	Data Availability	Late	

Source: **MWI 1**

HCl	1.20	ppm	85.74 %	0	0	\$ 0	\$ 0	\$ 0	581
NOx	109.72	ppm	85.74 %	0	0	\$ 0	\$ 0	\$ 0	592
Opacity	0.38865	%	85.83 %	0	2	\$ 0	\$ 302	\$ 0	601
SO2	18.69	ppm	85.74 %	0	0	\$ 0	\$ 0	\$ 0	566
Steam Flow	139.506	Klbs/hr	85.83 %	0	0	\$ 0	\$ 0	\$ 0	681
Temperature	2,378.55	Degrees F	85.74 %	0	0	\$ 0	\$ 0	\$ 0	478
Temperature-Bag	290.168	Degrees F	85.83 %	0	0	\$ 0	\$ 0	\$ 0	726
Source summary:			85.78 %	0	2	\$ 0	\$ 302	\$ 0	7

Source: **MWI 2**

HCl	3.45	ppm	90.28 %	0	0	\$ 0	\$ 0	\$ 0	583
NOx	110.36	ppm	90.28 %	0	0	\$ 0	\$ 0	\$ 0	593
SO2	17.43	ppm	90.28 %	0	0	\$ 0	\$ 0	\$ 0	570
Steam Flow	127.148	Klbs/hr	90.42 %	0	0	\$ 0	\$ 0	\$ 0	682
Temperature	2,424.53	Degrees F	90.28 %	0	0	\$ 0	\$ 0	\$ 0	481
Temperature-Bag	290.119	Degrees F	90.42 %	0	0	\$ 0	\$ 0	\$ 0	727
Source summary:			90.32 %	0	0	\$ 0	\$ 0	\$ 0	6

Source: **MWI 3**

HCl	0.27	ppm	84.86 %	0	0	\$ 0	\$ 0	\$ 0	585
NOx	125.69	ppm	84.86 %	0	0	\$ 0	\$ 0	\$ 0	594
SO2	18.40	ppm	84.86 %	0	0	\$ 0	\$ 0	\$ 0	573
Steam Flow	135.602	Klbs/hr	84.91 %	0	0	\$ 0	\$ 0	\$ 0	683
Temperature	2,370.67	Degrees F	84.86 %	0	0	\$ 0	\$ 0	\$ 0	485
Temperature-Bag	287.160	Degrees F	84.91 %	0	0	\$ 0	\$ 0	\$ 0	728
Source summary:			84.88 %	0	0	\$ 0	\$ 0	\$ 0	6

Source: **MWI 4**

HCl	0.50	ppm	83.38 %	0	0	\$ 0	\$ 0	\$ 0	587
NOx	140.35	ppm	83.38 %	0	0	\$ 0	\$ 0	\$ 0	595

SO2	26.20	ppm	83.38 %	0	0	\$ 0	\$ 0	\$ 0	575
Steam Flow	134.532	Klbs/hr	83.61 %	0	0	\$ 0	\$ 0	\$ 0	684
Temperature	2,353.58	Degrees F	83.38 %	0	0	\$ 0	\$ 0	\$ 0	488
Temperature-Bag	285.783	Degrees F	83.61 %	0	0	\$ 0	\$ 0	\$ 0	729
Source summary:			83.46 %	0	0	\$ 0	\$ 0	\$ 0	6

Source: MWI 5

HCl	1.76	ppm	88.01 %	0	0	\$ 0	\$ 0	\$ 0	589
NOx	117.72	ppm	88.01 %	0	0	\$ 0	\$ 0	\$ 0	597
Opacity	0.48571	%	88.10 %	0	1	\$ 0	\$ 300	\$ 0	609
SO2	14.41	ppm	88.01 %	0	0	\$ 0	\$ 0	\$ 0	577
Steam Flow	136.078	Klbs/hr	88.10 %	0	0	\$ 0	\$ 0	\$ 0	685
Temperature	2,389.01	Degrees F	88.01 %	0	0	\$ 0	\$ 0	\$ 0	492
Temperature-Bag	290.068	Degrees F	88.10 %	0	0	\$ 0	\$ 0	\$ 0	730
Source summary:			88.05 %	0	1	\$ 0	\$ 300	\$ 0	7

Source: MWI 6

HCl	0.52	ppm	97.04 %	0	0	\$ 0	\$ 0	\$ 0	591
NOx	122.23	ppm	97.04 %	0	0	\$ 0	\$ 0	\$ 0	599
Opacity	0.10947	%	97.04 %	0	1	\$ 0	\$ 300	\$ 0	611
SO2	19.54	ppm	97.04 %	0	0	\$ 0	\$ 0	\$ 0	579
Steam Flow	135.279	Klbs/hr	97.04 %	0	0	\$ 0	\$ 0	\$ 0	686
Temperature	2,400.48	Degrees F	97.04 %	0	0	\$ 0	\$ 0	\$ 0	495
Temperature-Bag	288.819	Degrees F	97.04 %	0	0	\$ 0	\$ 0	\$ 0	731
Source summary:			97.04%	0	1	\$ 0	\$ 300	\$ 0	7

Location summary:			88.41 %	0	4	\$ 0	\$ 902	\$ 0	39
Total Penalty:						\$ 902			

COMMENTS

The Opacity analyzers for Units 2, 3 and 4 were replaced during the 4th Quarter 2009 and have not received final certification as of the date of this report so they are not included in this report summary.

Aug 12 '10



August 11, 2010

Ms. Jillian Gallagher
Air Quality Compliance Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, Pennsylvania 19401

Subject: Covanta Delaware Valley, L.P.
Delaware Valley Resource Recovery Facility (DVRRF)
1st - 4th Quarter 2009 and 1st Quarter 2010 CACP

Dear Ms. Gallagher:

Please find attached the signed Consent Assessment of Civil Penalty (CACP) for CEMS violations for the 1st - 4th Quarter 2009 and 1st Quarter 2010, Transmittal of Penalty Payment, and a settlement check for \$8,576.00.

If you have any questions regarding the above information, please feel free to contact me or Steve Jenness at (610) 497-8100.

Sincerely,


Timothy Gregan
Facility Manager

cc: Bill Stroble - DEP Southeast Regional Office
Heather Henry - DEP Southeast Regional Office
Joe Walsh - Covanta
File- Compliance Regulatory- Air

PROGRAM AQ
FAC NAME COVANTA
COUNTY DELAWARE
MUNICIPALITY CHESTER (D) CO
FILE ID # 686710
FILE TYPE # CEMS



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHEAST REGIONAL OFFICE

RECEIVED AUG 2 2010

DEP - RECEIVED
SOUTHEAST REGION

AUG 12 '10

August 2, 2010

Mr. Steve Janness
Covanta Delaware Valley, LP
10 Highland Avenue
Chester, PA 19013

Re: First, Second, Third, and Fourth Quarter 2009 and
First Quarter 2010 CEMS Violations

Dear Mr. Janness:

Enclosed, please find a Consent Assessment of Civil Penalty (Consent Assessment) proposed as a means of settlement for specified violations of the Air Pollution Control Act and the regulations promulgated thereunder, which occurred at the Covanta Delaware Valley, LP (Covanta), site located at 10 Highland Avenue in Chester Township, Delaware County, Pennsylvania.

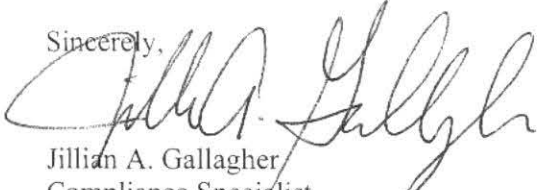
If Covanta wishes to enter into a Consent Assessment, please sign the enclosed agreement and return it to the Department of Environmental Protection (Department) within 15 days of the date of this letter. Upon receipt, I will obtain the remaining signatures, date the agreement, and return one fully executed copy to you.

The Department will convene a meeting to discuss the proposed civil penalty assessment for the subject violations, if such a meeting is requested by Covanta within 15 days of the date of this letter.

If the Department does not receive a request for a meeting or the signed agreements within 15 days of the date of this letter, the Department may issue a civil penalty assessment based upon the available information.

If you have any questions, please do not hesitate to contact me at the phone number located in the footer below.

Sincerely,


Jillian A. Gallagher
Compliance Specialist
Air Quality

Enclosure

cc: Mr. Stroble
Mr. McLemore
Covanta Delaware Valley, LP, Enforcement File
Re 30 (joh10aq)211