



Powering Today. Protecting Tomorrow.

David Nicol  
Facility Manager  
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February 25, 2021

NYS Department of Environmental Conservation  
Division of Materials Management  
Bureau of Permitting and Planning  
625 Broadway  
Albany, NY 12233-7260  
via email [swmfannualreport@dec.ny.gov](mailto:swmfannualreport@dec.ny.gov)

Subject: Covanta Niagara  
Permit 9-2911-00113/00023  
2020 Annual Operating Report

Dear Bureau of Permitting and Planning Representative,

Please see the Subject operating report. Supplemental information is included on additional sheets and an original closure bond is included.

Please contact me with any questions.

Thank you.

Sincerely,

dist: Peter Grasso, NYSDEC, [peter.grasso@dec.ny.gov](mailto:peter.grasso@dec.ny.gov)  
Anthony Poupalos, NYSDEC, [anthony.poupalos@dec.ny.gov](mailto:anthony.poupalos@dec.ny.gov)  
Paul Dicky, NC Health Department, [paul.dicky@niagaracounty.com](mailto:paul.dicky@niagaracounty.com)  
Mike Breniser, Covanta, [mbreniser@covanta.com](mailto:mbreniser@covanta.com)  
Brian Redanz, Covanta, [bredanz@covanta.com](mailto:bredanz@covanta.com)



# COMBUSTION AND THERMAL TREATMENT FACILITY ANNUAL / QUARTERLY REPORT

Submit the Annual Report no later than March 1, 2021.

A. This annual quarterly is for the year of operation from January 01, 2020 to December 31, 2020

B. Quarterly Report for: \_\_\_ Quarter 1 \_\_\_ Quarter 2 \_\_\_ Quarter 3 \_\_\_ Quarter 4

## SECTION 1 – FACILITY INFORMATION

FACILITY INFORMATION			
FACILITY NAME:			
FACILITY LOCATION ADDRESS:	FACILITY CITY:	STATE:	ZIP CODE:
FACILITY TOWN:	FACILITY COUNTY:	FACILITY PHONE NUMBER:	
FACILITY NYS PLANNING UNIT: <small>(A list of NYS Planning Units can be found at the end of this report).</small>			NYSDEC REGION #:
360 PERMIT #:	DATE ISSUED:	DATE EXPIRES:	NYS DEC ACTIVITY CODE:
FACILITY CONTACT:	<input type="checkbox"/> public <input type="checkbox"/> private	CONTACT PHONE NUMBER:	CONTACT FAX NUMBER:
CONTACT EMAIL ADDRESS:			
OWNER INFORMATION			
OWNER NAME:	OWNER PHONE NUMBER:	OWNER FAX NUMBER:	
OWNER ADDRESS:	OWNER CITY:	STATE:	ZIP CODE:
OWNER CONTACT:	OWNER CONTACT EMAIL ADDRESS:		
OPERATOR INFORMATION			
OPERATOR NAME:	<input type="checkbox"/> same as owner	<input type="checkbox"/> public <input type="checkbox"/> private	
PREFERENCES			
Preferred address to receive correspondence: <input type="checkbox"/> Facility location address <input type="checkbox"/> Owner address <input type="checkbox"/> Other (provide):			
Preferred email address: <input type="checkbox"/> Facility Contact <input type="checkbox"/> Owner Contact <input type="checkbox"/> Other (provide):			
Preferred individual to receive correspondence: <input type="checkbox"/> Facility Contact <input type="checkbox"/> Owner Contact <input type="checkbox"/> Other (provide):			

Did you operate in 2020?  Yes; Complete this form.

No; Complete and submit Sections 1 and 16. If you no longer plan to operate and wish to relinquish your permit/registration associated with this solid waste management activity, also complete the "Inactive Solid Waste Management Facility or Activity Notification Form" located at: <http://www.dec.ny.gov/chemical/52706.html> .

## SECTION 2 - SOLID WASTE RECEIVED/PROCESSED

Provide the tonnages of solid waste received. DO NOT REPORT IN CUBIC YARDS!

Specify the methods used to measure the quantities received and the percentages measured by each method

\_\_\_\_\_% Scale Weight                      \_\_\_\_\_% Estimated  
 \_\_\_\_\_% Truck Count                      \_\_\_\_\_% Other (Specify: \_\_\_\_\_)

Type of Solid Waste	January (tons)	February (tons)	March (tons)	April (tons)	May (tons)	June (tons)	July (tons)
Construction & Demolition Debris							
Industrial Waste (Including Industrial Process Sludges)							
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)							
Sewage Treatment Plant Sludge							
Treated Regulated Medical Waste							
Emergency Authorization Waste (Storm Debris)							
Other (specify)							
<b>Total Tons Received</b>							
<b>Total Tons Processed</b>							

**SECTION 2 - SOLID WASTE RECEIVED/PROCESSED** *(continued)*

Type of Solid Waste	Tip Fee (\$/ton)	August (tons)	September (tons)	October (tons)	November (tons)	December (tons)	Total Year (tons)	Daily Avg. (tons)
Construction & Demolition Debris								
Industrial Waste (Including Industrial Process Sludges)								
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)								
Sewage Treatment Plant Sludge								
Treated Regulated Medical Waste								
Emergency Authorization Waste (Storm Debris)								
Other <i>(specify)</i>								
<b>Total Tons Received</b>								
<b>Total Tons Processed</b>								

### SECTION 3 – SERVICE AREA OF SOLID WASTE RECEIVED

**Please identify where the waste is coming from.** The total tons received reported below should equal the total tons received in Section 2 (Solid Waste Received/Processed). **DO NOT REPORT IN CUBIC YARDS!**

- If the waste **WAS** received from another solid waste management facility, please write in the name *and address* of the facility along with the appropriate state, county and planning unit/municipality.
- If the waste **WAS NOT** received from another solid waste management facility, please write in “**Direct Haul**” along with the appropriate state, county and planning unit/municipality where the waste was generated.

Specify transport method and percentages of total waste transported by each:

\_\_\_\_\_ % Road                      \_\_\_\_\_ % Rail                      \_\_\_\_\_ % Water                      \_\_\_\_\_ % Other (specify: \_\_\_\_\_)

Explain which waste types and service areas below are included in these transport methods \_\_\_\_\_

SERVICE AREA OF SOLID WASTE RECEIVED					
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR “Direct Haul”	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT <small>(See Attached List of NYS Planning Units)</small>	TONS RECEIVED
<b>Construction &amp; Demolition Debris</b>					
<b>Industrial Waste (Including Industrial Process Sludges)</b>					

**SERVICE AREA OF SOLID WASTE RECEIVED**

TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul"	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units)	TONS RECEIVED
Mixed Municipal Solid Waste (Residential, Institutional & Commercial)					
Sewage Treatment Plant Sludge					
Treated Regulated Medical Waste (TRMW)*					
Emergency Authorization Waste (Storm Debris)					
Other (specify)					
<b>TOTAL RECEIVED (tons):</b> _____					

Part 360 Permit Limit (tpy) \_\_\_\_\_

Permit Limit based on Steaming rate (tpy) \_\_\_\_\_

\* List generators that provide you Certificates of Treatment forms and quantities of TRMW from each \_\_\_\_\_

## SECTION 4 – PLANT PERFORMANCE LOG

Complete the following Annual/Quarterly Plant Performance Log:

### PLANT PERFORMANCE LOG ANNUAL/QUARTERLY SUMMARY

Processible Waste Bypassed (Tons): \_\_\_\_\_

Untreatable Waste Bypassed (Tons): \_\_\_\_\_

Incinerator #1 Operations (Hours): \_\_\_\_\_

Incinerator #2 Operations (Hours): \_\_\_\_\_

Incinerator #3 Operations (Hours): \_\_\_\_\_

Incinerator #4 Operations (Hours): \_\_\_\_\_

Steam Generated (Klbs): \_\_\_\_\_

Steam Sold (Klbs): \_\_\_\_\_

Turbine Operation (Hours): \_\_\_\_\_

Turbine Steam Consumption (Klbs): \_\_\_\_\_

Power Generation (MWH): \_\_\_\_\_

Purchased Power (MWH): \_\_\_\_\_

Annual Electricity Sold to User (MWH): \_\_\_\_\_

Ash Residue (Tons): \_\_\_\_\_

Volatile Matter in Ash (%): \_\_\_\_\_

Ferrous Metal Recovered (Tons): \_\_\_\_\_

Ferrous Metal Sold (Tons): \_\_\_\_\_

Non-ferrous Metal Recovered (Tons): \_\_\_\_\_

Non-ferrous Metal Sold (Tons) \_\_\_\_\_

Water Consumption (Kgal): \_\_\_\_\_

<u>Facility's Size</u>	<u>Operations</u>
Number of Units Installed: _____	Facility is in production: _____
Nominal rated capacity of each unit: _____	Hours per day: _____
	Days per week: _____
	Days per year: _____

**DOES NOT INCLUDE BOILERS 1, 2, AND 5 WHICH ARE NATURAL GAS BOILERS ONLY. BOILERS 3 AND 4 ARE THE SOLID WASTE REGULATED BOILERS.**

Hours of Downtime	Unit #1	Unit #2	Unit #3	Unit #4	Total
Scheduled Maintenance	_____	_____	_____	_____	_____
Unscheduled Maintenance	_____	_____	_____	_____	_____
Total	_____	_____	_____	_____	_____
Availability (%) Reprinted	_____	_____	_____	_____	_____

## SECTION 5 – TRANSFER OR DISPOSAL DESTINATION

Identify the transfer or disposal destination of waste removed by indicating the name of the transfer or disposal facility, the type of solid waste transferred, the corresponding State/Country, the County/Province, the NYS Planning Unit of the transfer or disposal destination facility, and the amount transferred or disposed or used as alternative operating cover (AOC) at each destination. This only includes waste sent off-site for disposal, not metal recovered reported in Section 6. **Refer to the list of NYS Planning Units that can be found at the end of this report. DO NOT REPORT IN CUBIC YARDS!**

Transport (specify percentages):

\_\_\_\_\_ % Road                      \_\_\_\_\_ % Rail  
 \_\_\_\_\_ % Water                      \_\_\_\_\_ % Other (specify: \_\_\_\_\_)

Explain which waste types and service areas below are included in these transport methods \_\_\_\_\_

TRANSFER OR DISPOSAL DESTINATION								
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY TO WHICH IT WAS SENT <i>(Name &amp; Address)</i>	DESTINATION STATE OR COUNTRY	DESTINATION COUNTY OR PROVINCE	DESTINATION NYS PLANNING UNIT <i>(See Attached List of NYS Planning Units)</i>	AMOUNT TO TRANSFER DESTINATION (TONS)	AMOUNT TO DISPOSAL DESTINATION (TONS)	AMOUNT USED AS AOC (TONS)	TOTAL YEAR (TONS)
<b>Ash (MSW Energy Recovery)</b>								
<b>Bypass</b>								
<b>Emergency Authorization Waste (Storm Debris)</b>								
<b>Other (specify)</b>								
<b>TOTAL SENT (tons):</b> _____								

## SECTION 6 – METAL RECOVERED

Provide the tonnages of metal recovered from the mixed solid waste stream. Identify the location or solid waste management facility to which the recovered metal was sent from your facility, by indicating the name of the facility, the type of metal recovered, the corresponding State/Country, the County/Province, the NYS Planning Unit, and the amount recovered. **Refer to the list of NYS Planning Units that can be found at the end of this report.** DO NOT REPORT IN CUBIC YARDS!

Transport (specify percentages):

\_\_\_\_\_% Road                      \_\_\_\_\_% Rail  
 \_\_\_\_\_% Water                      \_\_\_\_\_% Other (specify: \_\_\_\_\_)

Explain which waste types and service areas are in these transport methods \_\_\_\_\_

METAL RECOVERED FOR REUSE/RECYCLING					
METAL RECOVERED	DESTINATION <small>(Name &amp; Address)</small>	DESTINATION STATE OR COUNTRY	DESTINATION COUNTY OR PROVINCE	DESTINATION NYS PLANNING UNIT <small>(See Attached List of NYS Planning Units)</small>	TONS RECOVERED <small>(out of facility)</small>
<b>Ferrous Metal</b>					
<b>Non-ferrous Metal</b>					
<b>Other Metal</b> <small>(specify)</small>					
<b>TOTAL METAL RECOVERED (tons):</b> _____					

## **SECTION 7 - FIRE AND SAFETY INCIDENTS**

Provide a summary of the time, date, and details of any incidents which required the implementation of the contingency plan.

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## **SECTION 8 - BUDGET**

Provide an annual income and expense statement providing details on the major accounting items and operating and maintenance costs.

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## **SECTION 9 - INSPECTIONS**

Provide a copy of the annual facility inspection report conducted and stamped by a professional engineer licensed to practice in New York State.

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## **SECTION 10 - GOALS**

Provide a narrative of the goals and objectives to be attained in the next future calendar year and any major repairs or renovations proposed.

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## SECTION 11 – UNAUTHORIZED SOLID WASTE

Has unauthorized solid waste been received at the facility during the reporting period?

Yes     No    If yes, give information below for each incident (attach additional sheets if necessary):

Date Received	Type Received	Date Disposed	Disposal Method & Location

### Radiation Monitoring

Does your facility use a fixed radiation monitor? \_\_\_\_ Yes \_\_\_\_ No

Identify Manufacturer \_\_\_\_\_ and Model \_\_\_\_\_ of fixed unit.

Does your facility use a portable radiation monitor? \_\_\_\_ Yes \_\_\_\_ No

Identify Manufacturer \_\_\_\_\_ and Model \_\_\_\_\_ of fixed unit.

If the radiation monitors been triggered give information below for each incident:

Incident Number	Received		Hauler	Origin	Truck Number	Reading	Disposal Status	Removed	
	Date	Time						Date	Time

## **SECTION 12 - COST ESTIMATES AND FINANCIAL ASSURANCE DOCUMENTS**

Are there required cost estimates and financial assurance documents for closure?

- Yes     No    If yes, attach additional sheets reflecting annual adjustments for inflation and any changes to the Closure Plan?

## **SECTION 13 – PROBLEMS**

Were any problems encountered during the reporting period (e.g., specific occurrences which have led to changes in facility procedures)?

- Yes     No    If yes, attach additional sheets identifying each problem and the methods for resolution of the problem.

## **SECTION 14 – CHANGES**

Were there any changes from approved reports, plans, specifications, and permit conditions?

- Yes     No    If yes, attach additional sheets identifying changes with a justification for each change.

## **SECTION 15 - PERMIT/CONSENT ORDER REPORTING REQUIREMENTS**

Are there any additional permit/consent order reporting requirements not covered by the previous sections of this form?

- Yes     No    If yes, attach additional sheets identifying the reporting requirements with their respective responses.

**SECTION 16 - SIGNATURE AND DATE BY OWNER OR OPERATOR**

Owner or Operator must sign, date and submit one completed form to the appropriate Regional Office (See attachment for Regional Office addresses, email addresses and Materials Management Contacts.)

The Owner or Operator must also submit one copy by email, fax or mail to:

New York State Department of Environmental Conservation  
Division of Materials Management  
Bureau of Solid Waste Management  
625 Broadway  
Albany, New York 12233-7260  
Fax 518-402-9041  
Email address: SWMFannualreport@dec.ny.gov

I certify, under penalty of law, that the data and other information identified in this report have been prepared under my direction and supervision in compliance with a system designed to ensure that qualified personnel properly and accurately gather and evaluate this information. I am aware that any false statement I make in such report is punishable pursuant to section 71-2703(2) of the Environmental Conservation Law and section 210.45 of the Penal Law.

  
\_\_\_\_\_  
Signature

2/25/21  
\_\_\_\_\_  
Date

David Nicol  
\_\_\_\_\_  
Name (Print or Type)

Plant Manager  
\_\_\_\_\_  
Title (Print or Type)

dnicol@covanta.com  
\_\_\_\_\_  
Email (Print or Type)

100 Energy Boulevard  
\_\_\_\_\_  
Address

Niagara Falls  
\_\_\_\_\_  
City

NY 14304  
\_\_\_\_\_  
State and Zip

(716) 278 8500  
\_\_\_\_\_  
Phone Number

ATTACHMENTS:  YES  NO  
(Please check appropriate line)

\*This page for reference only. Please do not return with submittal.

**Division of Materials Management  
New York State Department of Environmental Conservation  
Albany, New York 12233-7260**

**COMBUSTION AND THERMAL TREATMENT FACILITY**

These facilities use combustion to treat solid waste, including . but not limited to: mass burn, modular, and fluidized bed combustors; thermal treatment facilities that utilize plasma arc, pyrolysis and gasification; low-temperature thermal desorption units such as thermal strippers and soil roasters; and facilities that combust refuse-derived fuel.

Forms for all solid waste management facilities can be found at <http://www.dec.ny.gov/chemical/52706.html> and a brief description of each type of facility can be found at <http://www.dec.ny.gov/chemical/8495.html>.

**Annual/Quarterly Report**

**Submit the Annual Report no later than March 1, 2021.**

Reporting of the information indicated on this Combustion and Thermal Treatment Facility Annual/Quarterly Report form is required pursuant to 6 NYCRR Part 360. Failure to provide the required information requested is a violation of Environmental Conservation Law. Timely submission of a properly completed form to the Department's Regional Office that has jurisdiction over your facility and to the Department's Central Office is required to meet the Annual/Quarterly Report requirements of 6 NYCRR Part 360.

Where the Annual Report requirements have been modified, appropriate Sections (as necessary to reflect the modification) must be completed and submitted with a copy of the Department's written notification which allows the modification.

Entries on the report forms should be either typewritten or neatly printed in black ink. Attach additional sheets if space on the pages is insufficient or supplementary information is required or appropriate.

**SECTION 3 – SERVICE AREA OF SOLID WASTE RECEIVED**

Identify the facility's service area by indicating the type of solid waste received, the Solid Waste Management facility (SWMF) from which it was received (or Direct Haul), the corresponding State/Country, the County/Province, and the NYS Planning Unit and the amount received. **Refer to the list of NYS Planning Units that can be found at the end of this report.** DO NOT REPORT IN CUBIC YARDS!

**Additional Service Area Guidance:**

1) Direct hauled from the generator of the waste. In the case where the waste is hauled to your facility from the generator (i.e. hauled from residences, commercial establishments, etc.), "**Direct Haul**" is the appropriate response in Column 2 under "Service Area." Please report the tonnage by waste type and identify the state, county and planning unit where it was generated;

2) Sent to your municipal waste combustion or thermal treatment facility from another solid waste management facility. Waste may be sent to your municipal waste combustion or thermal treatment facility from another solid waste management facility. In this case, please report the tonnage by waste type from each sending solid waste management facility, as well as the sending facility's name, address, county, and the planning unit where the sending facility is located.

\*This page for reference only. Please do not return with submittal.

### New York State Planning Units & Regions

When completing the annual report, please use the Planning Unit listed below that corresponds with the municipality and county. **Note: The Planning Unit is not the DEC Region.**

DEC Region	Planning Unit	County	Municipality
1	Glen Cove	Nassau	Glen Cove (City)
	Hempstead		Hempstead (Town)
	Long Beach		Long Beach (City)
	North Hempstead Solid Waste Management Authority		North Hempstead (Town), <b>except 10 villages (see below)</b>
	Oyster Bay Solid Waste Disposal District		Oyster Bay (Town), <b>except 17 villages (see below)</b>
	Babylon	Suffolk	Babylon (Town)
	Brookhaven		Brookhaven (Town)
	East Hampton		East Hampton (Town)
	Fishers Island Waste Management District		Fishers Island
	Huntington		Huntington (Town)
	Islip Resource Recovery Agency		Islip (Town)
	Riverhead		Riverhead (Town)
	Shelter Island		Shelter Island (Town)
	Smithtown		Smithtown (Town)
	Southampton		Southampton (Town)
Southold	Southold (Town), <b>except Fishers Island</b>		
2	New York City	Bronx	Bronx
		Kings	Kings (Brooklyn)
		New York	New York (Manhattan)
		Queens	Queens
		Richmond	Richmond (Staten Island)
3	Dutchess County	Dutchess	
	Orange County	Orange	
	Putnam County	Putnam	
	Rockland County Solid Waste Management Authority (RCSWMA)	Rockland	
	Sullivan County	Sullivan	
	Ulster County Resource Recovery Agency (UCRRA)	Ulster	
	Westchester County	Westchester	
4	Colonie	Albany	Cohoes (City)
			Colonie (Town)
			Colonie (Village)
			Menands (Village)
			Watervliet (City)
	Capital Region Solid Waste Management Partnership	Albany	Albany (City)
			Altamont (Village)
			Berne (Town)
			Bethlehem (Town)
			Green Island (Town/Village)
			Guilderland (Town)
			Knox (Town)
			New Scotland (Town)
			Rensselaerville (Town)
			Voorheesville (Village)
			Westerlo (Town)

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		Rensselaer	East Greenbush (Town) Rensselaer (City)	
4	Eastern Rensselaer County Solid Waste Management Authority	Rensselaer	Castleton-on-Hudson (Village)	
			Hoosick Falls (Village)	
			Nassau (Village)	
			Pittstown (Town)	
			Schaghticoke (Town/Village)	
			Stephentown (Town)	
			Valley Falls (Village)	
			Berlin (Town)	Inactive Members
			Grafton (Town)	
			Hoosick (Town)	
			Nassau (Town)	
			Petersburg (Town)	
			Poestenkill (Town)	
			Columbia County	
Delaware County	Delaware			
Greene County	Greene			
Montgomery County	Montgomery			
Otsego County	Otsego			
Schoharie County	Schoharie			
Schenectady County	Schenectady			
5	Clinton County	Clinton		
	Essex County	Essex		
	County of Franklin Solid Waste Management Authority (CFSWMA)	Franklin		
	Fulton County	Fulton		
	Hamilton County	Hamilton		
	Saratoga County	Saratoga		
	Warren County	Warren		
	Washington County	Washington		
6	Development Authority of the North Country (DANC)	Jefferson		
		Lewis		
		St. Lawrence		
	Oneida-Herkimer Solid Waste Authority	Oneida		
		Herkimer		
7	Broome County	Broome		
	Cayuga County	Cayuga		
	Chenango County	Chenango		
	Cortland County	Cortland		
	Madison County	Madison		
	Onondaga County	Onondaga	All municipalities, <b>except Town and Village of Skaneateles (See below)</b>	
	Oswego County	Oswego		
	Tioga County	Tioga		
	Tompkins County	Tompkins		
8	Chemung County	Chemung		
	GLOW Region Solid Waste Management Committee	Genesee		
		Livingston		
	Monroe County	Monroe		
	Ontario County	Ontario		
	Orleans County	Orleans		
	Schuyler County	Schuyler		
Seneca County	Seneca			

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	Steuben County	Steuben	
	Wayne County	Wayne	
	Yates County	Yates	
	Allegany County	Allegany	
	Cattaraugus County	Cattaraugus	
	Chautauqua County	Chautauqua	
	GLOW Region Solid Waste Management Committee	Wyoming	
	Niagara	Niagara	
9	Northeast-Southtowns Solid Waste Management Board (NEST)	Erie	Akron (Village)
			Alden (Town/Village)
			Angola (Village)
			Aurora (Town)
			Blasdell (Village)
			Boston (Town)
			Brant (Town)
			Cheektowaga (Town)
			Clarence (Town)
			Colden (Town)
			Collins (Town)
			Concord (Town)
			Depew (Village)
			East Aurora (Village)
			Eden (Town)
			Elma (Town)
			Evans (Town)
			Farnham (Village)
			Gowanda (Village)
			Hamburg (Town/Village)
			Holland (Town)
			Lackawanna (City)
			Lancaster (Town/Village)
			Marilla (Town)
			Newstead (Town)
			North Collins (Town/Village)
			Orchard Park (Town/Village)
	Sardinia (Town)		
	Sloan (Village)		
	Springville (Village)		
	Wales (Town)		
	West Seneca (Town)		
	Northwest Communities Solid Waste Management Board (NWCB)	Erie	Amherst (Town)
Grand Island (Town)			
Kenmore (Village)			
Tonawanda (Town/Village)			
			Williamsville (Village)

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## Municipalities Not Currently Affiliated With a Recognized Planning Unit

DEC Region	County	Non-Member Municipality	
1	Nassau	North Hempstead	Great Neck Estates (Village)
			Great Neck Plaza (Village)
			Mineola (Village)
			New Hyde Park (Village)
			Old Westbury (Village) (portion)
			Plandome (Village)
			Plandome Manor (Village)
			Roslyn Harbor (Village) (portion)
			Westbury (Village)
			Williston Park (Village)
		Oyster Bay	Bayville (Village)
			Brookville (Village)
			Centre Island (Village)
			Cove Neck (Village)
			East Hills (Village) (portion)
			Glenwood – Glen Head Garbage District
			Lattington (Village)
			Laurel Hollow (Village)
			Matinecock (Village)
			Mill Neck (Village)
			Muttontown (Village)
			Old Brookville (Village)
			Old Westbury (Village) (portion)
			Oyster Bay Cove (Village)
			Roslyn Harbor (Village) (portion)
			Sea Cliff (Village)
Upper Brookville (Village)			
4	Albany	Coeymans (Town)	
		Ravena (Village)	
	Rensselaer	Brunswick (Town)	
		North Greenbush (Town)	
		Sand Lake (Town)	
		Schodack (Town)	
	Troy (City)		
Columbia	Canaan (Town)		
7	Onondaga	Skaneateles (Town/Village)	
9	Erie	Buffalo (City)	

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New York State Department of Environmental Conservation  
Division of Materials Management  
Bureau of Solid Waste Management

## MATERIAL MANAGEMENT PROGRAM CONTACTS

### CENTRAL OFFICE

Bureau of Solid Waste Management  
625 Broadway  
Albany, NY 12233-7260  
Phone: (518) 402-8678

For Submission of Solid Waste Management Facility Annual Reports only:

Fax: (518) 402-9041

Email: [swmfannualreport@dec.ny.gov](mailto:swmfannualreport@dec.ny.gov)

### REGIONAL OFFICE ADDRESS & LEAD CONTACT PERSON

#### REGION 1 (Nassau, Suffolk)

Syed Rahman/David Gibb  
SUNY @ Stony Brook  
50 Circle Road  
Stony Brook, NY 11790  
Phone: (631) 444-0375  
[SWMFannualreportR1@dec.ny.gov](mailto:SWMFannualreportR1@dec.ny.gov)

#### REGION 2 (Bronx, Kings, New York, Queens, Richmond)

Joseph O'Connell  
47-40 21st Street  
Long Island City, NY 11101-5407  
Phone: (718) 482-4896  
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September 2020

**Section 3 – SERVICE AREA**

SERVICE AREA					
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR DIRECT HAUL	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units)	TONS RECEIVED
<b>Industrial Waste (Including Industrial Process Sludges)</b>		Kansas			29
		Oregon			87
		New York			75,405
		Puerto Rico			133
		Massachusetts			437
		Iowa			95
		Canada			16,304
		North Carolina			61
		Michigan			39,883
		Vermont			300
		Indiana			661
		Virginia			7
		Kentucky			1,907
		Connecticut			992
		Wisconsin			1,417
		Texas			44
		Ohio			3,823
		Arkansas			1
		Rhode Island			124
		Pennsylvania			12,621
	West Virginia			250	
	Missouri			113	
	Illinois			42	
	Maryland			188	
	Maine			1,814	

SERVICE AREA					
TYPE OF SOLID WASTE	SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR DIRECT HAUL	SERVICE AREA STATE OR COUNTRY	SERVICE AREA COUNTY OR PROVINCE	SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units)	TONS RECEIVED
		Minnesota			89
		New Jersey			4,051
<b>Mixed Municipal Solid Waste (Residential, Institutional &amp; Commercial)</b>		Ontario	Canada		66,217
		New York	Erie	NWCB	43,885
		New York	Erie/Niagara		107,530
		New York	Lockport	Niagara County	173
		New York	Queens	New York City	412,638
<b>Treated Regulated Medical Waste (TRMW)*</b>	NY Environmental Serv Corp	New York	Ostego	Ostego County	12,201
	Alpha-Bio Med	Texas			339
	Stericylce - Dunkirk	New York	Chautauqua	Chautauqua County	115

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

Division of Air Resources, Region 9  
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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-01)

January 09, 2020

**Distribution:** Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

**Facility Name:** Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
**Facility ID Number:** 9-2911-00113 (DAR & DMM)  
**Reporting Period:** December 22, 2019 – January 04, 2020  
**Dates Present at Site:** December 23, 27, 30, & December 31.  
**Facility Monitor:** Anthony Poupalos, E.I.T.



**Areas of Concern:** Nothing to report.

**Areas of Progress:** Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 12/28/19 and 01/04/20 as per Condition 16 of the Solid Waste Permit For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the December 22 to January 04, 2020 period:

<b>Bi-Weekly Period:</b>		<b>December 22 - January 04</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		28,296	Tons
RTIF MSW Received		15,312	Tons
MSW Received (Average)		2,358	Tons/Day
MSW+NHIW+TMW Consumed (Total)		28,438	Tons
MSW+NHIW+TMW Consumed (Average)		2,031	Tons/Day
NHIW Received (Total)		5,633	Tons
NHIW Received (Average)		469	Tons/Day
Treated Medical Waste Received (Total)		452	Tons
Treated Medical Waste Received (Average)		38	Tons/Day
Ash Residue MSW (Total)		6,329	Tons
Ash Residue MSW (Average)		452	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	5,422	52	284
#2*	0	0	336
#3*	95,109	336	0
#4*	96,650	336	0
#5*	24,986	263	73
<b>Total Steam Generation (Klbs)</b>			<b>222,167</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

### 4. Excursion Occurrences

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
74.0	Opacity: The emission limit for opacity exhibited by the gases discharged to the atmosphere from a designated facility must not exceed 10 percent (6-minute average)	3	12/24/19	0.03	10.0%	11% (2212-2217)	1 (6-minute average block)	DBA Boiler 3 experienced a bag failure in cell 8 resulting in a opacity of 11% for its 6-min block. During the exceedance, the opacity ranged from 1.75 to 25.9 percent. The control room operator (CRO) isolated baghouse cells to located the source of the problem. Once its location was identified, the cell was isolated until the bag was replaced.

### 5. Spills/Cleanup

- None were observed or reported during this period.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - No waste was observed or reported on the tipping floor during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated January 02, DEC approval of Covanta Niagara's December 02 request for disposal of non-hazardous waste (school district records: paper & cardboard boxes) from application 20-001.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (scrap food material & waste from the manufacturing of meatball products: food waste, packaging, office/cafeteria waste & ppe) from application 20-002.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste from the assembly of aircraft [military/commercial/space] hardware: RCRA empty containers, office/cafeteria waste/packaging. Metals resulting from this assembly process are separated & recycled by separate party) from application 20-003.

- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (routine plant waste/debris from manufacturing of milk products: non-recyclable paper/cardboard, cafeteria trash, plastic & empty product milk cartons) from application 20-004.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (roof repair/replacement: wood, asphalt sheeting/tar, fiber glass insulation board & metal [nails, screws]) from application 20-005.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (plastic film/bags used for packaging a blend of meat & spices: packaging, cotton elastic netting, recra empty soy oil containers & office/cafeteria waste) from application 20-006.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste from the manufacturing of soft cheeses: raw/finished cheese, packaging, office/cafeteria waste & PPE) from application 20-007.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste from developing plastic/fabric toys for prototypes/testing: office/cafeteria waste packaging & rcra empty paint containers) from application 20-008.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (scrap food material & waste from the manufacturing of pasta products: food waste, packaging, office/cafeteria waste & ppe) from application 20-009.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (paper rolls/film with inks/coatings/adhesives that are converted on a printing press that become labels, envelopes, wristbands & retail signage: trim waste, rcra empty containers, office/cafeteria waste & discarded packaging) from application 20-010.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste from around the facility: office/cafeteria waste, packaging, wood scrap & rcra empty paint containers) from application 20-011.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (wool felt applied to PET [polyethylene terephthalate - thermoplastic polymer resin] board that is cut to spec: PET offcuts, wood, felt & office/cafeteria waste) from application 20-012.
- By letter dated January 02, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (undesired/off-spec waste from manufacturing quinacridone & DDP pigments: N-7500 gamma qa crude dry, irgazin red I 3660 hd, irgazin red I 3656 hd , empty packaging & debris/PPE) from application 20-013.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF (“Action Level Exceedance”)
  - *Covanta’s Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated “hot load” area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- Nothing to report.

- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were observed or reported during this period.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on March 31, 2018.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.

- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: twenty-four (24) rail cars arrived at Covanta at 1900 on 12/28/19. The last five (5) rail cars were unloaded by 0700 on 12/31/19 due to the delivery of containers during non-working hours by RTIF employees. The Department was notified of the extra time required to unload the RTIF Containers.
  - RTIF Containers: Thirty-one (31) rail cars arrived at Covanta at 0930 on 01/04/20. The last seven (7) rail cars were unloaded by 0930 on 01/07/20 due to the delivery of containers during non-working hours by RTIF employees. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped December 30, Covanta submitted a Covanta Niagara 2019 OMM.
- By email time stamped December 30, Covanta submitted a Covanta Niagara Sodium Thiosulfate 4Q19 Update.
- By email time stamped January 02, Covanta submitted a Covanta Niagara Rejection Form Notification from a 12/27/19 delivery.
- By email time stamped January 02, Covanta submitted a Covanta Niagara December 2019 Sanitary DMR.

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-02)

January 30, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: January 05, 2020 – January 18, 2020  
Dates Present at Site: January 6, 7, 8, 13, 15 & January 17.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:** DBA Boiler 3 was offline on 01/07/20 at 0404 for tube repairs and came back online on 1/9/20 at 1121. Waste was on the tipping floor on 1/09/20 at 0815 and off the floor on 01/10/20 on 1300 as a result of DBA 3 being offline for repairs.

**Areas of Progress:** Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline on 01/07/20 at 0404 for tube repairs and came back online on 1/9/20 at 1121. Waste was on the tipping floor on 1/09/20 at 0815 and off the floor on 01/10/20 on 1300 as a result of DBA 3 being offline for repairs.

2. Plant Operation Summary

- Below is the plant operation data for the January 05 to January 18, 2020 period:

<b>Bi-Weekly Period:</b>		<b>January 05 - January 18</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		35,402	Tons
RTIF MSW Received		16,670	Tons
MSW Received (Average)		2,950	Tons/Day
MSW+NHIW+TMW Consumed (Total)		34,221	Tons
MSW+NHIW+TMW Consumed (Average)		2,444	Tons/Day
NHIW Received (Total)		7,892	Tons
NHIW Received (Average)		658	Tons/Day
Treated Medical Waste Received (Total)		472	Tons
Treated Medical Waste Received (Average)		39	Tons/Day
Ash Residue MSW (Total)		6,088	Tons
Ash Residue MSW (Average)		435	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	14,522	121	215
#2*	0	0	336
#3*	85,218	281	55
#4*	103,774	336	0
#5*	19,749	241	95
<b>Total Steam Generation (Klbs)</b>			<b>223,263</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
1/8/2020	SO2	3	29.9	1/8/2020	530	1/8/2020	1041	Further information will be provided in the quarterly reports.	No
1/17/2020	CO2/NOx	3	25.7	1/17/2020	530	1/17/2020	728	Further information will be provided in the quarterly reports.	Yes
1/17/2020	CO2/NOx	4	25.2	1/17/2020	545	1/17/2020	711	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- None were observed or reported during this period.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	1/9/20 8:15 AM	1/10/19 1:00 PM	28.75	Waste was on the tipping floor on 01/09/20 at 0815 and off the floor on 01/10/20 on 1300 as a result of DBA 3 being offline for repairs.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated January 09, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste/material collected during law enforcement criminal & narcotics investigations: documents, firearms & narcotics) from application 20-014.
- By letter dated January 09, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (duct work removal from pharmaceutical operations: metal duct work with active pharmaceutical ingredient residues & PPE [gloves & tyvek]) from application 20-015.

- By letter dated January 10, DEC disapproval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (trash & tank debris from tank cleaning of penacolite resins: R-2200, R-50, R-2170 & debris [hose, tyvek, gloves, plastic, tank bottoms, wood pallets]) from application 20-016 DISAPP.
- By letter dated January 16, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (consolidation of plant trash/waste collected at transfer facility for energy from waste processing: plastics, wood debris, cardboard/paper, metal, empty consumer packages, rubber & textiles) from application 20-017.
- By letter dated January 16, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (healthcare related material goes through an autoclave process to destroy any dangerous pathogens that may exist in the waste: cardboard/paper products, plastic, metals & treated regulated medical waste) from application 20-018.
- By letter dated January 16, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste from the manufacturing of consumer goods: trim waste/printed film scrap, cardboard cores, office/cafeteria waste, RCRA empty 5 gallon plastic & metal containers & packaging waste) from application 20-019.
- By letter dated January 16, DEC approval of Covanta Niagara's December 20 request for disposal of non-hazardous waste (waste from the processing of beans: damaged/split beans, bean skins, office/cafeteria waste & cardboard/packaging material) from application 20-020.

#### 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

#### 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF (“Action Level Exceedance”)
  - Covanta’s Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated “hot load” area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- Nothing to report.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were observed or reported during this period.

11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:

- Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
  - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
  - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - None were reported or observed during this period.

## 12. Reports and Other Correspondence

- None were submitted during this period.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
270 Michigan Avenue, Buffalo, NY 14203-2915  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-03)

February 06, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: January 19, 2020 – February 01, 2020  
Dates Present at Site: January 21, 22, 24, 27, 28, 29, & January 31.  
Facility Monitor: Anthony Poupalos, E.I.T.

*AP*

### Areas of Concern:

DBA Boiler 4 was offline on 01/21/20 at 1832 for tube leak repairs and came back online on 1/23/20 at 1940. Waste was on the tipping floor on 1/23/20 at 2230 and off the floor on 01/24/20 on 1300 as a result of DBA 4 being offline for repairs. On 1/27/20 at 1400, an incipient fire was identified in the waste shredder. It was quickly extinguished with the foam suppression system. On 1/27/20 at 1457, the Contingency Plan was activated and a Level C emergency was called to alert employees in the DBA building of a smoky condition due to the sifting hoppers being cleared. At 1521 on 1/27/20, the Level C was lifted. On 01/31/20 a Modern Transfer Truck had a medium energy radiation spike of 163 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. For additional information, see section 10 below.

### Areas of Progress:

Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 4 was offline on 01/21/20 at 1832 for tube leak repairs and came back online on 1/23/20 at 1940. Waste was on the tipping floor on 1/23/20 at 2230 and off the floor on 01/24/20 on 1300 as a result of DBA 4 being offline for repairs. On 1/27/20 at 1400, an incipient fire was identified in the waste shredder. It was quickly extinguished with the foam suppression system. On 1/27/20 at 1457, the Contingency Plan was activated and a Level C emergency was called to alert employees in the DBA building of a smoky condition due to the sifting hoppers being cleared. At 1521 on 1/27/20, the Level C was lifted. On 01/31/20 a Modern Transfer Truck had a medium energy radiation spike of 163 cps, which is above Covanta’s trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the January 19 to February 01, 2020 period:

<b>Bi-Weekly Period:</b>		<b>January 19 - February 01</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		33,145	Tons
RTIF MSW Received		14,732	Tons
MSW Received (Average)		2,762	Tons/Day
MSW+NHIW+TMW Consumed (Total)		33,177	Tons
MSW+NHIW+TMW Consumed (Average)		2,370	Tons/Day
NHIW Received (Total)		8,047	Tons
NHIW Received (Average)		671	Tons/Day
Treated Medical Waste Received (Total)		617	Tons
Treated Medical Waste Received (Average)		51	Tons/Day
Ash Residue MSW (Total)		6,045	Tons
Ash Residue MSW (Average)		432	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	7,251	56	280
#2*	0	0	336
#3*	103,566	336	0
#4*	88,198	288	48
#5*	23,637	269	67
<b>Total Steam Generation (Klbs)</b>			<b>222,652</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

4. Excursion Occurrences

- None were observed or reported during this period.

5. Spills/Cleanup

- None were observed or reported during this period.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	1/23/20 10:30 PM	1/24/20 1:00 PM	14.50	Waste was on the tipping floor on 1/23/20 at 2230 and off the floor on 01/24/20 on 1300 as a result of DBA 4 being offline for repairs.

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated January 30, DEC approval of Covanta Niagara's December 16 request for disposal of non-hazardous waste (confidential documents: records & paper files) from application 20-021.
- By letter dated January 30, DEC approval of Covanta Niagara's December 21 request for disposal of non-hazardous waste (waste from painting facility: cafeteria/site waste [non-oily rags/paint rags], floor sweepings dry paint trays/rollers, pleated dust collecting filters & packaging waste [cardboard, plastic, paper & scrap wood]) from application 20-022.
- By letter dated January 30, DEC approval of Covanta Niagara's December 21 request for disposal of non-hazardous waste (expired/off-spec waste: soy flour [nutrisoy] & wheat millings) from application 20-023.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF (“Action Level Exceedance”)
  - Covanta’s Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated “hot load” area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
Low Energy (20 - 99 keV):	5 cps	6 cps	5 cps
Medium Energy (100 - 400 keV):	12 cps	13 cps	12 cps
High Energy (>400 keV):	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
Low Energy (20 - 99 keV):	25 cps	30 cps	25 cps
Medium Energy (100 - 400 keV):	60 cps	65 cps	60 cps
High Energy (>400 keV):	30 cps	30 cps	20 cps

- On 01/31/20 a Modern Transfer Truck had a medium energy radiation spike of 163 cps, which is above Covanta’s trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 02/03/19, the truck was sent to the tipping floor.

- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - On 1/27/20 at 1400, an incipient fire was identified in the waste shredder. It was quickly extinguished with the foam suppression system. The shredder is currently being cleaned out and will be inspected to help identify a cause and to make sure it is functioning properly prior to being put back in service. The Department was notified of the event with an initial and 5-day notification.
  - On 1/27/20 at 1457, the Contingency Plan was activated and a Level C emergency was called to alert employees in the DBA building of a smoky condition due to the sifting hoppers being cleared. At 1521 on 1/27/20, the Level C was lifted. The Department notified of the event with an initial and 5-day notification.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.

- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - None were reported or observed during this period.

## 12. Reports and Other Correspondence

- By email time stamped January 20, Covanta submitted a Covanta Niagara 4Q19 Solid Waste Report.
- By email time stamped January 20, Covanta submitted a Covanta Niagara Duct Burner Compliance Report.
- By email time stamped January 29, Covanta submitted a Covanta Niagara 4Q19 Excess Emission Report.
- By email time stamped January 29, Covanta submitted a Covanta Niagara 2H19 MACT Report.
- By email time stamped January 29, Covanta submitted a Covanta Niagara NESHAP Tune Ups 2019.
- By email time stamped January 29, Covanta submitted a Covanta Niagara 4Q19 Fuels Summary Report.
- By email time stamped January 29, Covanta submitted a Covanta Niagara 2H19 and Y2019 Title V Compliance Report.

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

Division of Air Resources, Region 9  
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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-04)

March 05, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: February 02, 2020 – February 15, 2020  
Dates Present at Site: February 03, 04, 06, 07, 10, 11, 12 & February 14.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:**

DBA Boiler 3 was offline on 02/11/20 at 2243 for ash extractor repairs and came back online on 02/13/20 at 1331. On 02/04/20, 02/11/20 and 02/14/20, Modern Trucks had radiation spikes above Covanta's trigger limit (5x background). The 02/04/20 truck was scanned using an identifier at the facility, which determined that Iodine-131 (I-131) was present in the stream. The truck was taken off the site by its owner on 02/04/20 and was not sent to the tipping floor. The first Modern truck that arrived on 02/11/20 was rejected by the facility by use of a DOT-SP-11406 form that the Department approved. The truck was sent back to its generator on 02/18/20. The second Modern truck that arrived on 02/11/20 and the one from 02/14/20 were left in the designated holding area until their levels dropped below acceptable limits. For additional information, see section 10 below.

**Areas of Progress:**

Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline on 02/11/20 at 2243 for ash extractor repairs and came back online on 02/13/20 at 1331. On 02/04/20, 02/11/20 and 02/14/20, Modern Trucks had radiation spikes above Covanta’s trigger limit (5x background). The 02/04/20 truck was scanned using an identifier at the facility, which determined that Iodine-131 (I-131) was present in the stream. The truck was taken off the site by its owner on 02/04/20 and was not sent to the tipping floor. The first Modern truck that arrived on 02/11/20 was rejected by the facility by use of a DOT-SP-11406 form that the Department approved. The truck was sent back to its generator on 02/18/20. The second Modern truck that arrived on 02/11/20 and the one from 02/14/20 were left in the designated holding area until their levels dropped below acceptable limits. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the February 02 to February 15, 2020 period:

<b>Bi-Weekly Period:</b>		<b>February 02 - February 15</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		30,958	Tons
RTIF MSW Received		12,339	Tons
MSW Received (Average)		2,580	Tons/Day
MSW+NHIW+TMW Consumed (Total)		31,193	Tons
MSW+NHIW+TMW Consumed (Average)		2,228	Tons/Day
NHIW Received (Total)		6,963	Tons
NHIW Received (Average)		580	Tons/Day
Treated Medical Waste Received (Total)		508	Tons
Treated Medical Waste Received (Average)		42	Tons/Day
Ash Residue MSW (Total)		6,550	Tons
Ash Residue MSW (Average)		468	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	14,135	111	225
#2*	0	0	336
#3*	88,695	296	40
#4*	100,961	336	0
#5*	22,530	239	97
<b>Total Steam Generation (Klbs)</b>			<b>226,321</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
2/12/2020	NOx	4	25.6	2/12/2020	609	2/12/2020	743	Further information will be provided in the quarterly reports.	Yes
2/13/2020	SO2	3	27.9	2/13/2020	530	2/13/2020	939	Further information will be provided in the quarterly reports.	Intermittent

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill #1910571: On 02/12/20 at 0945, approximately 4-gallons of water/glycol mixture was released on to the pavement when a cooling hose failed on a piece of mobile equipment. The spill was cleaned up with no sensitive receptors affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - None were observed or reported during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated February 05, DEC approval of Covanta Niagara's February 05 request for disposal of non-hazardous waste (paper documents/cardboard boxes contaminated by sewer back-up water/liquid sludge: wet paper & cardboard) from application 20-024.
- By letter dated February 13, DEC approval of Covanta Niagara's February 05 request for disposal of non-hazardous waste (clean-up from routine operations at bulk light products terminal from spills/releases: petroleum impacted rags, absorbents, PPE, plastic, hoses, soils & water) from application 20-025.
- By letter dated February 13, DEC approval of Covanta Niagara's February 07 request for disposal of non-hazardous waste (new/off-spec paint during manufacturing process: styrene acrylic copolymer & water) from application 20-026.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
  
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
2/13/2020	Flow	5	27.5	2/13/2020	632	2/13/2020	1001	Further information will be provided in the quarterly reports.	Yes

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF (“Action Level Exceedance”)
  - *Covanta’s Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated “hot load” area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 02/04/20 a Modern Truck had a medium energy radiation spike of 357 cps, which is above Covanta's trigger limit (5x background). The truck was scanned using an identifier at the facility, which determined that Iodine-131 (I-131) was present in the stream. The truck was taken off the site by its owner on 02/04/20 and was not sent to the tipping floor.
- On 02/11/20 a Modern Truck had a medium energy radiation spike of 72 cps, which is above Covanta's trigger limit (5x background). The facility acquired approval from the Department and rejected the waste by use of a DOT-SP-11406 form. The truck was sent back to its generator on 02/18/20.
- On 02/11/20 a Modern Transfer Truck had a medium energy radiation spike of 79 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 02/14/20, the truck was sent to the tipping floor.
- On 02/14/20 a Modern Transfer Truck had a medium energy radiation spike of 87 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 02/19/20, the truck was sent to the tipping floor.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.

- All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - None were reported or observed during this period.

## 12. Reports and Other Correspondence

- By email time stamped February 05, Covanta submitted a Covanta Niagara January 2020 Sanitary DMR.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-04)

February 06, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: February 02, 2020 – February 15, 2020  
Dates Present at Site: February 03, 04, 06, 07, 10, 11, 12 & February 14.  
Facility Monitor: Anthony Poupalos, E.I.T. *AP*

### Areas of Concern:

DBA Boiler 3 was offline on 02/11/20 at 2243 for ash extractor repairs and came back online on 02/13/20 at 1331. On 02/04/20, 02/11/20 and 02/14/20, Modern Trucks had radiation spikes above Covanta's trigger limit (5x background). The 02/04/20 truck was scanned using an identifier at the facility, which determined that Iodine-131 (I-131) was present in the stream. The truck was taken off the site by its owner on 02/04/20 and was not sent to the tipping floor. The first Modern truck that arrived on 02/11/20 was rejected by the facility by use of a DOT-SP-11406 form that the Department approved. The truck was sent back to its generator on 02/18/20. The second Modern truck that arrived on 02/11/20 and the one from 02/14/20 were left in the designated holding area until their levels dropped below acceptable limits. For additional information, see section 10 below.

### Areas of Progress:

Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline on 02/11/20 at 2243 for ash extractor repairs and came back online on 02/13/20 at 1331. On 02/04/20, 02/11/20 and 02/14/20, Modern Trucks had radiation spikes above Covanta’s trigger limit (5x background). The 02/04/20 truck was scanned using an identifier at the facility, which determined that Iodine-131 (I-131) was present in the stream. The truck was taken off the site by its owner on 02/04/20 and was not sent to the tipping floor. The first Modern truck that arrived on 02/11/20 was rejected by the facility by use of a DOT-SP-11406 form that the Department approved. The truck was sent back to its generator on 02/18/20. The second Modern truck that arrived on 02/11/20 and the one from 02/14/20 were left in the designated holding area until their levels dropped below acceptable limits. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the February 02 to February 15, 2020 period:

<b>Bi-Weekly Period:</b>		<b>February 02 - February 15</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		30,958	Tons
RTIF MSW Received		12,339	Tons
MSW Received (Average)		2,580	Tons/Day
MSW+NHIW+TMW Consumed (Total)		31,193	Tons
MSW+NHIW+TMW Consumed (Average)		2,228	Tons/Day
NHIW Received (Total)		6,963	Tons
NHIW Received (Average)		580	Tons/Day
Treated Medical Waste Received (Total)		508	Tons
Treated Medical Waste Received (Average)		42	Tons/Day
Ash Residue MSW (Total)		6,550	Tons
Ash Residue MSW (Average)		468	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	14,135	111	225
#2*	0	0	336
#3*	88,695	296	40
#4*	100,961	336	0
#5*	22,530	239	97
<b>Total Steam Generation (Klbs)</b>			<b>226,321</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
2/12/2020	NOx	4	25.6	2/12/2020	609	2/12/2020	743	Further information will be provided in the quarterly reports.	Yes
2/13/2020	SO2	3	27.9	2/13/2020	530	2/13/2020	939	Further information will be provided in the quarterly reports.	Intermittent

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill #1910571: On 02/12/20 at 0945, approximately 4-gallons of water/glycol mixture was released on to the pavement when a cooling hose failed on a piece of mobile equipment. The spill was cleaned up with no sensitive receptors affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - None were observed or reported during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated February 05, DEC approval of Covanta Niagara's February 05 request for disposal of non-hazardous waste (paper documents/cardboard boxes contaminated by sewer back-up water/liquid sludge: wet paper & cardboard) from application 20-024.
- By letter dated February 13, DEC approval of Covanta Niagara's February 05 request for disposal of non-hazardous waste (clean-up from routine operations at bulk light products terminal from spills/releases: petroleum impacted rags, absorbents, PPE, plastic, hoses, soils & water) from application 20-025.
- By letter dated February 13, DEC approval of Covanta Niagara's February 07 request for disposal of non-hazardous waste (new/off-spec paint during manufacturing process: styrene acrylic copolymer & water) from application 20-026.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
2/13/2020	Flow	5	27.5	2/13/2020	632	2/13/2020	1001	Further information will be provided in the quarterly reports.	Yes

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF (“Action Level Exceedance”)
  - *Covanta’s Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated “hot load” area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 02/04/20 a Modern Truck had a medium energy radiation spike of 357 cps, which is above Covanta's trigger limit (5x background). The truck was scanned using an identifier at the facility, which determined that Iodine-131 (I-131) was present in the stream. The truck was taken off the site by its owner on 02/04/20 and was not sent to the tipping floor.
- On 02/11/20 a Modern Truck had a medium energy radiation spike of 72 cps, which is above Covanta's trigger limit (5x background). The facility acquired approval from the Department and rejected the waste by use of a DOT-SP-11406 form. The truck was sent back to its generator on 02/18/20.
- On 02/11/20 a Modern Transfer Truck had a medium energy radiation spike of 79 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 02/14/20, the truck was sent to the tipping floor.
- On 02/14/20 a Modern Transfer Truck had a medium energy radiation spike of 87 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 02/19/20, the truck was sent to the tipping floor.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.

- All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - None were reported or observed during this period.

## 12. Reports and Other Correspondence

- By email time stamped February 05, Covanta submitted a Covanta Niagara January 2020 Sanitary DMR.

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-05)

March 18, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: February 16, 2020 – February 29, 2020  
Dates Present at Site: February 19 & February 21.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:** DBA Boiler 3 was offline on 02/27/20 at 1152 for ash extractor repairs and came back online on 02/13/20 at 1331. On 02/17/20 and on 02/19/20, Modern Trucks had radiation spikes above Covanta's trigger limit. The trucks were not processed upon arrival at the facility. For additional information, see section 10 below.

**Areas of Progress:** Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline on 02/27/20 at 1152 for ash extractor repairs and came back online on 02/13/20 at 1331. On 02/17/20 and on 02/19/20, Modern Trucks had radiation spikes above Covanta's trigger limit. The trucks were not processed upon arrival at the facility. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 02/16/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the February 16 to February 29, 2020 period:

<b>Bi-Weekly Period:</b>		<b>February 16 - February 29</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		33,751	Tons
RTIF MSW Received		14,217	Tons
MSW Received (Average)		2,813	Tons/Day
MSW+NHIW+TMW Consumed (Total)		32,449	Tons
MSW+NHIW+TMW Consumed (Average)		2,318	Tons/Day
NHIW Received (Total)		7,789	Tons
NHIW Received (Average)		649	Tons/Day
Treated Medical Waste Received (Total)		593	Tons
Treated Medical Waste Received (Average)		49	Tons/Day
Ash Residue MSW (Total)		6,341	Tons
Ash Residue MSW (Average)		453	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	9,879	86	250
#2*	0	0	336
#3*	86,911	290	46
#4*	103,285	336	0
#5*	28,185	257	79
<b>Total Steam Generation (Klbs)</b>			<b>228,259</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- None were observed or reported during this period.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - None were observed or reported during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated February 20, DEC approval of Covanta Niagara's February 17 request for disposal of non-hazardous waste (discarding of chemical products that were inadvertently mixed prior to their use in a manufacturing process: tall oil, durasyn 162 [dec-1-ene, dimers, hydrogenated] & water) from application 20-027.
- By letter dated February 20, DEC approval of Covanta Niagara's February 17 request for disposal of non-hazardous waste (excess raw material not used during production of bodyarmor: super drink powder & stevia extract powder [90% stevioside]) from application 20-028.
- By letter dated February 20, DEC approval of Covanta Niagara's February 17 request for disposal of non-hazardous waste (unused/expired latex paint from hospital: loose packed latex paint in gaylord box) from application 20-029.
- By letter dated February 20, DEC approval of Covanta Niagara's February 18 request for disposal of non-hazardous waste (process waste generated from the production of automobile components [radiators, HVAC Units, heater cores, oil coolers, evaporators & condensers]: cab flux [wet/dry], oily absorbent material/debris, braze residue & equipment cleaning/maintenance wash water/debris) from application 20-030.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
2/26/2020	CO	1	3.5	2/26/2020	856	2/26/2020	942	Further information will be provided in the quarterly reports.	Yes

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
2/26/2020	O2 Wet	5	51.3	2/26/2020	630	2/27/2020	959	Further information will be provided in the quarterly reports.	No

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF (“Action Level Exceedance”)
  - *Covanta’s Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated “hot load” area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 02/11/20 a Modern Truck had a medium energy radiation spike of 72 cps, which is above Covanta's trigger limit (5x background). The facility acquired approval from the Department and rejected the waste by use of a DOT-SP-11406 form. The truck was sent back to its generator on 02/18/20.
- On 02/14/20 a Modern Transfer Truck had a medium energy radiation spike of 87 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 02/19/20, the truck was sent to the tipping floor.
- On 02/17/20 a Modern Transfer Truck had a medium energy radiation spike of 105.5 cps, which is above Covanta's trigger limit (5x background). The truck was not processed upon arrival at the facility.
- On 02/19/20 a Modern Transfer Truck had an energy radiation spike of 140 cps, which is above Covanta's trigger limit (5x background). The truck was not processed upon arrival at the facility.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

## 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Forty-eight (48) rail cars arrived at Covanta at 1900 on 02/16/20. The last six (6) cars were unloaded by 0700 on 02/19/20 due to the delivery of containers when the RTIF was not staffed. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped February 18, Covanta submitted a Covanta Niagara 2019 Annual Solid Waste Report.
- By email time stamped February 28, Covanta submitted a Covanta CEMS O&MM.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-06)

March 23, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: March 01, 2020 – March 14, 2020  
Dates Present at Site: March 02, 03, 04 & March 06.  
Facility Monitor: Anthony Poupalos, E.I.T.



### **Areas of Concern:**

DBA Boiler 3 was offline on 02/27/20 at 1152 for ash extractor repairs and came back online on 02/29/20 at 0948. (Correction from Bi-Weekly Report 2020-05.)

### **Areas of Progress:**

Boiler 3's maintenance outage scheduled for 03/29/20 has been postponed until further notice as a result of the COVID-19 virus.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline on 02/27/20 at 1152 for ash extractor repairs and came back online on 02/29/20 at 0948. (Correction from Bi-Weekly Report 2020-05.) Boiler 3's maintenance outage scheduled for 03/29/20 has been postponed until further notice as a result of the COVID-19 virus.

2. Plant Operation Summary

- Below is the plant operation data for the March 01 to March 14, 2020 period:

<b>Bi-Weekly Period:</b>		<b>March 01 - March 14</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		36,507	Tons
RTIF MSW Received		13,187	Tons
MSW Received (Average)		3,042	Tons/Day
MSW+NHIW+TMW Consumed (Total)		35,955	Tons
MSW+NHIW+TMW Consumed (Average)		2,568	Tons/Day
NHIW Received (Total)		8,257	Tons
NHIW Received (Average)		688	Tons/Day
Treated Medical Waste Received (Total)		473	Tons
Treated Medical Waste Received (Average)		39	Tons/Day
Ash Residue MSW (Total)		7,371	Tons
Ash Residue MSW (Average)		527	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*,**	9,879	86	250
#2*,**	0	0	336
#3*,**	101,824	335	1
#4*,**	102,514	335	1
#5*,**	13,092	239	97
<b>Total Steam Generation (Klbs)</b>			<b>227,309</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

\*\*Daylight savings time adjustment (+1h) occurred at 2am on 03/08/20. Any boilers online at 2am are shown to be down as the hour is skipped in the system (total hours for this period is 335 instead of 336).

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
3/3/2020	CO2	4	3.3	3/3/2020	1541	3/3/2020	1714	Further information will be provided in the quarterly reports	Yes
3/3/2020	NOx	4	11.2	3/3/2020	1341	3/3/2020	1722	Further information will be provided in the quarterly reports.	Yes
3/4/2020	CO, CO2, SO2	3	4.2	3/4/2020	911	3/4/2020	956	Further information will be provided in the quarterly reports	Yes
3/7/2020	CO NOX	3	17.3	3/7/2020	530	3/7/2020	858	Further information will be provided in the quarterly reports.	Yes
3/7/2020	CO2	4	27.6	3/7/2020	545	3/7/2020	934	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill #1911481: On 03/14/20 approximately 8 ounces of hydraulic oil spilled outside on a concrete pad when a hydraulic hose on a truck failed. No sensitive receptors were affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - None were observed or reported during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated March 05, DEC approval of Covanta Niagara's February 26 request for disposal of non-hazardous waste (off-spec pharmaceutical waste from product manufacturing: paper, plastic, bottles, original packaging, PPE pharmaceutical agents, inactive agents, starch & cellulose) from application 20-031

- By letter dated March 05, DEC approval of Covanta Niagara's February 26 request for disposal of non-hazardous waste (off-spec products, sample retains & production scrap from pharm manufacturing: purified water, flavor ingredients, sodium sulfate, potassium sulfate & magnesium sulfate) from application 20-032.
- By letter dated March 05, DEC approval of Covanta Niagara's February 28 request for disposal of non-hazardous waste (rubbermaid tilt trucks used to collect metal chips produced by machining parts: plastic & metal) from application 20-033.
- By letter dated March 05, DEC approval of Covanta Niagara's March 03 request for disposal of non-hazardous waste (waste from the cleaning/scraping of materials & products: non-haz debris paks, silicones, siloxanes, cured elastomers, gums & non-haz pumpable liquid siloxanes/silicones) from application 20-034.
- By letter dated March 09, DEC approval of Covanta Niagara's March 05 request for disposal of non-hazardous waste (general office/cafeteria waste: paper, multi-layer packaging, food, plastic & office waste) from application 20-035.
- By letter dated March 12, DEC approval of Covanta Niagara's March 11 request for disposal of non-hazardous waste (spent toner & ink cartridges) from application 20-036.

#### 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
3/1/2020	NOx	1	48.0	3/1/2020	600	3/2/2020	610	Further information will be provided in the quarterly reports.	No

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

#### 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

#### 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> <u>RTIF RAD Detector</u>	<b>Serial 1505LFM048</b> <u>Inbound RAD Detector</u>	<b>Serial 1505LFM049</b> <u>Outbound RAD Detector</u>
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> <u>RTIF RAD Detector</u>	<b>Serial 1505LFM048</b> <u>Inbound RAD Detector</u>	<b>Serial 1505LFM049</b> <u>Outbound RAD Detector</u>
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 02/17/20 a Modern Transfer Truck had a medium energy radiation spike of 105.5 cps, which is above Covanta's trigger limit (5x background). The truck was not processed upon arrival at the facility.
- On 02/19/20 a Modern Transfer Truck had an energy radiation spike of 140 cps, which is above Covanta's trigger limit (5x background). The truck was not processed upon arrival at the facility.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

## 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - No issues were observed or reported during this period.

## 12. Reports and Other Correspondence

- By email time stamped March 11, Covanta submitted a Covanta CEMS O&MM.
- By email time stamped March 13, Covanta submitted a Covanta Niagara February 2020 Sanitary DMR.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-07)

April 06, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: March 15, 2020 – March 28, 2020  
Dates Present at Site: March 16.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

DBA Boiler 4 was offline for tube repairs on 03/17/20 at 1832 and came back online on 03/19/20 at 0540. Boiler 3 was offline for ash extractor repairs on 03/18/20 at 1923 and came back online on 03/20/20 at 0146. Waste was on the tipping floor on 03/18/20 at 2000 and off the floor on 03/21/20 at 0321 as a result of DBA 3 and 4 being down. DBA Boiler 3 was brought down on 03/24/20 at 1559 for roller-grate repairs and came back online on 03/28/20 at 0403. Waste was on the tipping floor on 03/24/20 at 1411 and was off the floor by 03/28/20 at 1149 as result of DBA 3 being offline.

### Areas of Progress:

Semi-Annual Ash testing is scheduled for the week of 05/11/20. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.



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The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is still continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 4 was offline for tube repairs on 03/17/20 at 1832 and came back online on 03/19/20 at 0540. Boiler 3 was offline for ash extractor repairs on 03/18/20 at 1923 and came back online on 03/20/20 at 0146. Waste was on the tipping floor on 03/18/20 at 2000 and off the floor on 03/21/20 at 0321 as a result of DBA 3 and 4 being down. DBA Boiler 3 was brought down on 03/24/20 at 1559 for roller-grate repairs and came back online on 03/28/20 at 0403. Waste was on the tipping floor on 03/24/20 at 1411 and was off the floor by 03/28/20 at 1149 as result of DBA 3 being offline. Semi-Annual Ash testing is scheduled for the week of 05/11/20. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.

2. Plant Operation Summary

- Below is the plant operation data for the March 15 to March 28, 2020 period:

<b>Bi-Weekly Period:</b>		<b>March 15 - March 28</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		30,249	Tons
RTIF MSW Received		14,967	Tons
MSW Received (Average)		2,521	Tons/Day
MSW+NHIW+TMW Consumed (Total)		27,859	Tons
MSW+NHIW+TMW Consumed (Average)		1,990	Tons/Day
NHIW Received (Total)		6,784	Tons
NHIW Received (Average)		565	Tons/Day
Treated Medical Waste Received (Total)		407	Tons
Treated Medical Waste Received (Average)		34	Tons/Day
Ash Residue MSW (Total)		6,462	Tons
Ash Residue MSW (Average)		462	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	21,646	162	174
#2*	0	0	336
#3*	64,878	222	114
#4*	93,270	302	34
#5*	30,720	260	76
<b>Total Steam Generation (Klbs)</b>			<b>210,514</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
3/18/2020	O2	4	26.6	3/18/2020	553	3/18/2020	844	Further information will be provided in the quarterly reports.	No
3/19/2020	O2	4	23.8	3/19/2020	553	3/19/2020	831	Further information will be provided in the quarterly reports.	Intermittent
3/20/2020	CO2	4	11.0	3/20/2020	2006	3/20/2020	2053	Further information will be provided in the quarterly reports.	Yes
3/20/2020	NOx	4	32.0	3/20/2020	545	3/20/2020	2030	Further information will be provided in the quarterly reports.	Yes
3/21/2020	CO, CO2, NOx, SO2	3	32.5	3/21/2020	530	3/21/2020	1423	Further information will be provided in the quarterly reports.	Yes
3/22/2020	O2	3	23.1	3/22/2020	026	3/22/2020	1422	Further information will be provided in the quarterly reports.	Yes
3/25/2020	CO	3	24.1	3/25/2020	530	3/25/2020	554	Further information will be provided in the quarterly reports.	No
3/26/2020	CO	3	30.2	3/26/2020	530	3/26/2020	1205	Further information will be provided in the quarterly reports.	No

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- None were observed or reported during this period.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	3/18/20 8:00 PM	3/21/20 3:21 AM	55.35	Waste was on the tipping floor on 03/18/20 at 2000 and off the floor on 03/21/20 at 0321 as a result of DBA 3 and 4 being down.
15	3/24/20 2:11 PM	3/28/19 11:49 AM	93.63	Waste was on the tipping floor on 03/24/20 at 1411 and was off the floor by 03/28/20 at 1149 as result of DBA 3 being offline.

## 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated March 17, DEC approval of Covanta Niagara's February 26 request for disposal of non-hazardous waste (cleanup of virgin diesel/hydraulic oil & speedy dry absorbents) from application 20-037
- By letter dated March 18 DEC approval of Covanta Niagara's February 26 request for disposal of non-hazardous waste (off-spec/excess/scrap material from manufacturing: Q8-6039, Q8-6150, Q8-6425, Q8-6330, Q8-6245, 6-3445 intermediate [ethylbenzene], 9040 silicone elastomer blend, 7-9600 Part A soft filling elastomer, 7-2317 INT fluid, 50 CST intermediate) from application 20-038.
- By letter dated March 18, DEC approval of Covanta Niagara's February 28 request for disposal of non-hazardous waste (non-haz household chemicals/waste from HHW collection events: soaps, water based cleaners, acrylic latex caulking, polishes, waxes, grout, mortar, cement & non-flammable adhesive/glues) from application 20-039.
- By letter dated March 18, DEC approval of Covanta Niagara's March 03 request for disposal of non-hazardous waste (expired/off-spec unused feed additives: corn cob, dicalcium phosphite anhydrous, hemicell xt, klucel exf, maxiban premix, monensin sodium granulation, monteban premix, nicarbazin, plasadone, polyplasdone xl, rumensin 90, semolina, sodium aluminosilicate, soy flour & wheat middlings) from application 20-040.
- By letter dated March 19, DEC approval of Covanta Niagara's March 05 request for disposal of non-hazardous waste (finished goods/ice cream product waste: ice cream, fiber drums, coated paperboard, wood pallets & plastic wrap) from application 20-041.
- By letter dated March 19, DEC approval of Covanta Niagara's March 05 request for disposal of non-hazardous waste (contraband, evidence & police records) from application 20-042.
- By letter dated March 23, DEC approval of Covanta Niagara's March 05 request for disposal of non-hazardous waste (firearms [no ammunition] & drug disposal) from application 20-043.

## 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
3/21/2020	O2	5	30.1	3/21/2020	1524	3/21/2020	1839	Further information will be provided in the quarterly reports	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]	Serial 1505LFM047 RTIF RAD Detector	Serial 1505LFM048 Inbound RAD Detector	Serial 1505LFM049 Outbound RAD Detector
Low Energy (20 - 99 keV):	5 cps	6 cps	5 cps
Medium Energy (100 - 400 keV):	12 cps	13 cps	12 cps
High Energy (>400 keV):	6 cps	6 cps	4 cps
5X Background Trigger Limit in Counts/Second (cps)	Serial 1505LFM047 RTIF RAD Detector	Serial 1505LFM048 Inbound RAD Detector	Serial 1505LFM049 Outbound RAD Detector
Low Energy (20 - 99 keV):	25 cps	30 cps	25 cps
Medium Energy (100 - 400 keV):	60 cps	65 cps	60 cps
High Energy (>400 keV):	30 cps	30 cps	20 cps

- On 02/17/20 a Modern Transfer Truck had a medium energy radiation spike of 105.5 cps, which is above Covanta's trigger limit (5x background). The truck was sent to the tipping floor on 03/06/20 after its levels dropped down below acceptable limits.
- On 02/19/20 a Modern Transfer Truck had an energy radiation spike of 140 cps, which is above Covanta's trigger limit (5x background). The truck was sent to the tipping floor on 03/06/20 after its levels dropped down below acceptable limits.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.

- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - No issues were observed or reported during this period.

## 12. Reports and Other Correspondence

- By email time stamped March 18, Covanta submitted a Schedule for the upcoming Stack Testing, Relative Accuracy Test Audits and Semi-Annual Ash Testing for May and June.
- By email time stamped March 26, Covanta submitted a Covanta Niagara Sodium Thiosulfate 1Q20 Update.



# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-08)

April 17, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: March 29, 2020 – April 11, 2020  
Dates Present at Site: None.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

On 04/01/20 at 1411, waste was on the tipping floor as a result of DBA Boiler 3 being down for roller grate repairs until 03/28/20. Waste was off the floor on 04/02/20 at 2130. On 04/10/20, a Modern Transfer Truck had a medium energy radiation spike of 102.5 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. For additional information see section 10 below.

### Areas of Progress:

Semi-Annual Ash testing is scheduled for the week of 05/11/20. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. On 04/01/20 at 1411 waste was on the tipping floor as a result of DBA Boiler 3 being down for roller grate repairs until 03/28/20. Waste was off the floor on 04/02/20 at 2130. On 04/10/20, a Modern Transfer Truck had a medium energy radiation spike of 102.5 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. For additional information see section 10 below. Semi-Annual Ash testing is scheduled for the week of 05/11/20. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.

2. Plant Operation Summary

- Below is the plant operation data for the March 29 to April 11, 2020 period:

<b>Bi-Weekly Period:</b>		<b>March 29 - April 11</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		29,372	Tons
RTIF MSW Received		12,534	Tons
MSW Received (Average)		2,448	Tons/Day
MSW+NHIW+TMW Consumed (Total)		32,615	Tons
MSW+NHIW+TMW Consumed (Average)		2,330	Tons/Day
NHIW Received (Total)		6,768	Tons
NHIW Received (Average)		564	Tons/Day
Treated Medical Waste Received (Total)		453	Tons
Treated Medical Waste Received (Average)		38	Tons/Day
Ash Residue MSW (Total)		7,851	Tons
Ash Residue MSW (Average)		561	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	841	9	327
#2*	0	0	336
#3*	101,152	336	0
#4*	102,129	336	0
#5*	16,741	225	111
<b>Total Steam Generation (Klbs)</b>			<b>220,863</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

4. Excursion Occurrences

- None were observed or reported during this period.

5. Spills/Cleanup

- Spill 2000027: On 04/01/20 at 1445, approximately 1-gallon of hydraulic oil was released on to the pavement when a hose failed on a mobile piece of equipment. The spill was cleaned up and there were no sensitive receptors affected.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	4/1/20 2:11 PM	4/2/20 9:30 PM	31.32	On 04/01/20 at 1411 waste was on the tipping floor as a result of DBA Boiler 3 being down for roller grate repairs until 03/28/20. Waste was off the floor on 04/02/20 at 2130.

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated March 30, DEC approval of Covanta Niagara's March 27 request for disposal of non-hazardous waste (unrecyclable waste: empty paper/polypropylene bags & cardboard containing residual phenolic resin product) from application 20-044.
- By letter dated April 02, DEC approval of Covanta Niagara's April 01 request for disposal of non-hazardous waste (off-spec/unused non-haz diagnostic/procedure trays & admission/amenity kits: paper, cardboard/plastic packaging, plastic bottles, non-haz pharmaceutical creams, gels & tablets with inert ingredients) from application 20-045.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.

- EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
4/8/2020	O2 Wet	5	33.9	4/8/2020	630	4/8/2020	1636	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 04/10/20, a Modern Transfer Truck had a medium energy radiation spike of 102.5 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 04/15/20, the truck was sent to the tipping floor.

- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - No issues were observed or reported during this period.

## 12. Reports and Other Correspondence

- By email time stamped March 30, Covanta submitted a Covanta Niagara DBA Stack Test Workplan 2020 and Rev1.
- By email time stamped March 30, Covanta submitted a Covanta Niagara EFW 1 RATA Workplan.
- By email time stamped April 01, Covanta submitted a Covanta Niagara Boiler 5 RATA Workplan.
- By email time stamped April 02, Covanta submitted a Covanta Niagara DBA Boilers 3 and 4 RATA Workplan.
- By email time stamped April 07, Covanta submitted a Covanta Niagara Metal Recovery Notification Letter.
- By email time stamped April 10, Covanta submitted a Covanta Niagara March Sanitary DMR.
- By email time stamped April 10, Covanta submitted a Covanta Niagara 2Q20 Sanitary DMR.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-09)

May 04, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: April 12, 2020 – April 25, 2020  
Dates Present at Site: None.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

Maintenance and repairs on the waste bunker crane grapples occurred throughout the week of 04/20/20. As a result, waste was on and off the tipping floor for short periods of time to accommodate the unloading of waste deliveries. On 04/21/20 at 0835, waste was on the tipping floor as a result of crane repairs in the waste bunker. Waste was off the tipping floor on 04/21/20 at 2100. Waste was on the tipping floor on 04/22/20 at 0945 and off the floor on 04/23/20 at 0130 due to crane repairs.

### Areas of Progress:

Semi-Annual Ash testing is scheduled for the week of 05/11/20. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Maintenance and repairs on the waste bunker crane grapples occurred throughout the week of 04/20/20. As a result, waste was on and off the tipping floor for short periods of time to accommodate the unloading of waste deliveries. On 04/21/20 at 0835, waste was on the tipping floor as a result of crane repairs in the waste bunker. Waste was off the tipping floor on 04/21/20 at 2100. Waste was on the tipping floor on 04/22/20 at 0945 and off the floor on 04/23/20 at 0130 due to crane repairs. Semi-Annual Ash testing is scheduled for the week of 05/11/20. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.

2. Plant Operation Summary

- Below is the plant operation data for the April 12 to April 25, 2020 period:

<b>Bi-Weekly Period:</b>		<b>April 12 - April 25</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		31,444	Tons
RTIF MSW Received		12,079	Tons
MSW Received (Average)		2,620	Tons/Day
MSW+NHIW+TMW Consumed (Total)		32,727	Tons
MSW+NHIW+TMW Consumed (Average)		2,338	Tons/Day
NHIW Received (Total)		6,467	Tons
NHIW Received (Average)		539	Tons/Day
Treated Medical Waste Received (Total)		363	Tons
Treated Medical Waste Received (Average)		30	Tons/Day
Ash Residue MSW (Total)		7,678	Tons
Ash Residue MSW (Average)		548	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	6,520	76	260
#2*	0	0	336
#3*	101,575	336	0
#4*	101,051	336	0
#5*	11,195	153	183
<b>Total Steam Generation (Klbs)</b>			<b>220,341</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
4/20/2020	NOx	3	5.2	4/20/2020	545	4/20/2020	821	Further information will be provided in the quarterly reports.	Yes

4. Excursion Occurrences

- None were observed or reported during this period.

5. Spills/Cleanup

- None were observed or reported during this period.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	4/21/20 8:35 AM	4/21/20 9:00 PM	12.42	On 04/21/20 at 0835, waste was on the tipping floor as a result of crane repairs in the waste bunker. Waste was off the tipping floor on 04/21/20 at 2100.
15	4/22/20 9:45 AM	4/23/19 1:30 AM	15.75	Waste was on the tipping floor on 04/22/20 at 0945 and off the floor on 04/23/20 at 0130 due to crane repairs

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated April 17, DEC approval of Covanta Niagara's April 15 request for disposal of non-hazardous waste (discarding of off-spec material: shampoo, conditioner, non-haz soaps, lotion toothpaste & bottles) from application 20-046.
- By letter dated April 17, DEC approval of Covanta Niagara's April 15 request for disposal of non-hazardous waste (discarding of off-spec material: shampoo, conditioner, non-haz soaps, lotion toothpaste & bottles) from application 20-047.
- By letter dated April 23, DEC approval of Covanta Niagara's April 23 request for disposal of non-hazardous waste (off-spec/unused non-haz diagnostic/procedure trays & admission/amenity kits: paper, cardboard/plastic packaging, plastic bottles, non-haz pharmaceutical creams, gels & tablets with inert ingredients) from application 20-048.

- By letter dated April 23, DEC approval of Covanta Niagara's April 23 request for disposal of non-hazardous waste (off-spec/unused non-haz diagnostic/procedure trays & admission/amenity kits: paper, cardboard/plastic packaging, plastic bottles, non-haz pharmaceutical creams, gels & tablets with inert ingredients) from application 20-049.
- By letter dated April 23, DEC approval of Covanta Niagara's April 23 request for disposal of non-hazardous waste (off-spec/unused non-haz diagnostic/procedure trays & admission/amenity kits: paper, cardboard/plastic packaging, plastic bottles, non-haz pharmaceutical creams, gels & tablets with inert ingredients) from application 20-050.

#### 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

#### 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

#### 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 04/10/20, a Modern Transfer Truck had a medium energy radiation spike of 102.5 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. On 04/15/20, the truck was sent to the tipping floor.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.

- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - No issues were observed or reported during this period.

#### 12. Reports and Other Correspondence

- By email time stamped April 12, Covanta submitted a Covanta Niagara Annual Emission Statement Rev1.
- By email time stamped April 20, Covanta submitted a Covanta Niagara 1Q20 Solid Waste Report.
- By email time stamped April 22, Covanta submitted a Covanta Niagara Boiler 1 CEMS QA/QC and O&MM.
- By email time stamped April 24, Covanta submitted a Covanta Niagara 1Q20 Excess Emission Report.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-10)

May 15, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: April 26, 2020 – May 09, 2020  
Dates Present at Site: None.  
Facility Monitor: Anthony Poupalos, E.I.T.

**Areas of Concern:** DBA Boiler 3 was offline for tube repairs on 05/06/20 at 1832 and was brought back online on 05/09/20 at 0158.

**Areas of Progress:** Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline for tube repairs on 05/06/20 at 1832 and was brought back online on 05/09/20 at 0158. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 05/08/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below. Covanta tentatively scheduled the Stack Testing for DBAs 3 & 4 for 05/27/20 through 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 are tentatively scheduled for 06/01/20 through 06/04/20.

2. Plant Operation Summary

- Below is the plant operation data for the April 26 to May 09, 2020 period:

<b>Bi-Weekly Period:</b>		<b>April 26 - May 09</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		36,392	Tons
RTIF MSW Received		14,101	Tons
MSW Received (Average)		3,033	Tons/Day
MSW+NHIW+TMW Consumed (Total)		34,333	Tons
MSW+NHIW+TMW Consumed (Average)		2,452	Tons/Day
NHIW Received (Total)		7,795	Tons
NHIW Received (Average)		650	Tons/Day
Treated Medical Waste Received (Total)		438	Tons
Treated Medical Waste Received (Average)		37	Tons/Day
Ash Residue MSW (Total)		6,234	Tons
Ash Residue MSW (Average)		445	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	15,117	141	195
#2*	0	0	336
#3*	83,926	281	55
#4*	102,243	336	0
#5*	14,717	177	159
<b>Total Steam Generation (Klbs)</b>			<b>216,001</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
5/7/2020	CO2	3	0.0	5/7/20	1447	5/7/2020	1512	Further information will be provided in the quarterly reports.	Yes
5/7/2020	NOx	3	25.6	5/7/2020	530	5/7/2020	1442	Further information will be provided in the quarterly reports.	Yes
5/7/2020	SO2	3	14.3	5/7/2020	1447	5/7/2020	1512	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill 2000774: On 5/6/20 at approximately 1330, a hydraulic hose failed on a mobile piece of equipment. Less than 1 gallon was released to the concrete pavement. No sensitive receptors were affected. The spill is cleaned up.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - No waste on the floor was observed or reported during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated April 28, DEC approval of Covanta Niagara's April 27 request for disposal of non-hazardous waste (off-spec/unused non-haz diagnostic/procedure trays & admission/amenity kits: paper, cardboard/plastic packaging, plastic bottles, non-haz pharmaceutical creams, gels & tablets with inert ingredients) from application 20-051.
- By letter dated April 29, DEC approval of Covanta Niagara's April 27 request for disposal of non-hazardous waste (confidential documents: paper files, cardboard & plastic debris) from application 20-052.
- By letter dated April 29, DEC approval of Covanta Niagara's April 27 request for disposal of non-hazardous waste (discarding of misc. non-haz waste water from various processes, containment cleanouts & maintenance: water, printing/branding ink

[phthalocyanine blue pigment, zirconyl carbonate, acrylic copolymer & ethoxylated octylphenol], used lubricating/gear oils, water soluble cutting fluid, ethylene/propylene glycol, rust/dirt particles, sodium hydroxide & tert-butyl acetate [0-0.25%]) from application 20-053.

- By letter dated April 29, DEC approval of Covanta Niagara's April 28 request for disposal of non-hazardous waste (waste from drug investigations, court documents & confiscations: paper, cardboard, electronic media, drugs, non-haz weapons [no ammunition], & personal items from arrests) from application 20-054.
- By letter dated May 07, DEC disapproval of Covanta Niagara's April 27 request for disposal of non-hazardous waste (leachate & suspended solids from a sulfur/lime landfill that has been pre-treated with sodium permanganate) from application 20-055 DISAPP.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
4/29/2020	CO2	5	11.3	4/29/2020	630	4/29/2020	1007	Further information will be provided in the quarterly reports.	Intermittent
4/29/2020	NOx	5	4.5	4/29/2020	630	4/29/2020	948	Further Information will be provided in the quarterly reports.	Intermittent
4/29/2020	O2 Dry/Wet	5	11.3	4/29/2020	630	4/29/2020	1007	Further information will be provided in the quarterly reports.	Intermittent
5/4/2020	O2 Wet	5	18.9	5/4/2020	630	5/4/2020	1114	Further information will be provided in the quarterly reports.	No
5/5/2020	O2 Wet	5	6.7	5/5/2020	630	5/5/2020	833	Further Information will be provided in the quarterly reports.	No

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported during this period.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:

- Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
  - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
  - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: eleven (11) rail cars arrived at Covanta at 1030 on 05/08/20. All eleven (11) rail cars were unloaded by 2230 on 05/11/20 due to the delivery of containers during non-working hours by RTIF employees. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped April 28, Covanta submitted a Covanta Niagara 1Q20 Fuels Summary Report.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-11)

June 05, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: May 10, 2020 – May 23, 2020  
Dates Present at Site: None.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

On 05/12/20, DBA Boilers 3 & 4 tripped offline at 0940 and 0952 after Boiler 3 experienced a tube failure at 0939. Boiler 4 was brought back online by 0958 and Boiler 3 was offline by 1227. During this event, both the primary and secondary fans shut down for DBA 3 & 4. The Contingency Plan was activated, and a Level C was called due to a steam leak in the boiler. At 0944, a Level B was called to ensure that all persons were out of the boiler house. At 1049 both the Level B and C were lifted. Boiler 3 was repaired and came back online on 05/16/20 at 1113. Waste was on the tipping floor on 05/13/20 at 0000 and was off the floor on 05/16/20 at 2300. On 05/17/20 at 1348, the Contingency Plan was activated, and a Level B was called. At 1342, while the crane grapple was mixing waste in the bunker, a pile of waste was uncovered and caught on fire. Facility personnel extinguished it with a fire hose. As a precaution, the Fire Department was called at 1351. They arrived within a few minutes of being called. At 1430, the Fire Department left site without discharging their fire hoses, and at 1433, the Level B condition was lifted. A fire watch was posted on the tipping floor for extra precaution. Boiler 4 was offline on 05/19/20 at 0821 for ram feeder repairs and came back online on 05/19/20 at 2343. Waste was on the tipping floor on 05/19/20 at 1130 and was off the floor on 05/23/20 at 0045. For additional information, see section 10 below.

### Areas of Progress:

Stack Testing for DBAs 3 & 4 is scheduled for to begin on 05/27/20 through 05/28/20.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

On 05/12/20, DBA Boilers 3 & 4 tripped offline at 0939 and 0952, respectively, after Boiler 3 experienced a tube failure at 0939. Boiler 4 was brought back online by 0958 and Boiler 3 was offline by 1227. During this event, both the primary and secondary fans shut down for DBA 3 & 4. The Contingency Plan was activated, and a Level C was called due to a steam leak in the boiler. At 0944, a Level B was called to ensure that all persons were out of the boiler house. At 1049 both the Level B and C were lifted. Boiler 3 was repaired and came back online on 05/16/20 at 1113. Waste was on the tipping floor on 05/13/20 at 0000 and was off the floor on 05/16/20 at 2300. On 05/17/20 at 1348, the Contingency Plan was activated, and a Level B was called. At 1342, while the crane grapple was mixing waste in the bunker, a pile of waste was uncovered and caught on fire. Facility personnel extinguished it with a fire hose. As a precaution, the Fire Department was called at 1351. They arrived within a few minutes of being called. At 1430, the Fire Department left site without discharging their fire hoses, and at 1433, the Level B condition was lifted. A fire watch was posted on the tipping floor for extra precaution. Boiler 4 was offline on 05/19/20 at 0821 for ram feeder repairs and came back online on 05/19/20 at 2343. Waste was on the tipping floor on 05/19/20 at 1130 and was off the floor on 05/23/20 at 0045. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 05/10/20 and 05/23/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the May 10 to May 23, 2020 period:

Bi-Weekly Period:		May 10 - May 23	
Items	Quantity	Units	
MSW Received (Includes RTIF)	33,033	Tons	
RTIF MSW Received	16,743	Tons	
MSW Received (Average)	2,753	Tons/Day	
MSW+NHIW+TMW Consumed (Total)	32,210	Tons	
MSW+NHIW+TMW Consumed (Average)	2,301	Tons/Day	
NHIW Received (Total)	7,092	Tons	
NHIW Received (Average)	591	Tons/Day	
Treated Medical Waste Received (Total)	411	Tons	
Treated Medical Waste Received (Average)	34	Tons/Day	
Ash Residue MSW (Total)	6,470	Tons	
Ash Residue MSW (Average)	462	Tons/Day	
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	13,399	104	232
#2*	0	0	336
#3*	73,088	239	97
#4*	96,472	322	14
#5*	26,047	247	89
<b>Total Steam Generation (Klbs)</b>			<b>209,006</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
5/13/2020	NOx	4	9.2	5/13/2020	545	5/13/2020	731	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
85.0	Carbon Monoxide (COc): carbon monoxide emission limit for mass burn waterwall municipal waste combustor.	3 & 4	05/12/20	2.30 & 0.30	100 ppm	2,361 ppm & 145.1 ppm (0800 - 1200)	1 (4 hour block)	On 05/12/20, DBA Boilers 3 & 4 tripped offline at 0939 and 0952, respectively, after Boiler 3 experienced a tube failure at 0939. Boiler 4 was brought back online by 0958 and Boiler 3 was offline by 1227 (Control Room Operator noted fire off the grates at 1277). During the 0800 - 1200 CO compliance blocks, the exceedances were 1,442 ppm and 145.1 ppm in Boilers 3 and 4, respectively. This information will be included with the next Quarterly Excess Emissions Report.
85.0	Carbon Monoxide (COc): carbon monoxide emission limit for mass burn waterwall municipal waste combustor	3	05/12/20	0.43	100 ppm	4,000 ppm (1200 - 1600)	1 (4 hour block)	On 05/12/20, DBA Boilers 3 & 4 tripped offline at 0939 and 0952, respectively, after Boiler 3 experienced a tube failure at 0939. Boiler 4 was brought back online by 0958 and Boiler 3 was offline by 1227 (Control Room Operator noted fire off the grates at 1277). The 1200 - 1600 CO compliance block was 4,000 ppm. This information will be included with the next Quarterly Excess Emissions Report.
27.0	Compliance Certification - Intermittent Emission Testing: Compliance with mercury emission limits shall be based on annual stack test by USEPA test Method 29 (40 CFR 60, Appendix A) and must be acceptable by the commissioner 2. The permittee shall install, operate and maintain a carbon adsorption injection system or other system for the control of mercury emissions from each furnace. The mercury control system shall include a method to monitor the flow rate of the adsorbing agent or chemical reagents	3	05/12/20	0.45	Stack Tested Minimum Block Average Required. 23.1 lbs/hr	0.0 lbs/hr (1200 - 1800)	1 (6 hour block)	On 05/12/20, DBA Boilers 3 & 4 tripped offline at 0939 and 0952, respectively, after Boiler 3 experienced a tube failure at 0939. Boiler 4 was brought back online by 0958 and Boiler 3 was offline by 1227 (Control Room Operator noted fire off the grates at 1277). When Boiler 3 tripped offline at 0939, both the primary and secondary fans shut down, as did the carbon system. The carbon system was not feeding any carbon in the DBA 3 flue gas for the first 27 minutes of the 6 hour block before the boiler was offline at 1277. This information will be included with the next Quarterly Excess Emissions Report.

### 5. Spills/Cleanup

- None were observed or reported during this period.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	5/13/20 12:00 AM	5/18/20 11:00 PM	95.00	Waste was on the tipping floor on 05/13/20 at 0000 and was off the floor on 05/16/20 at 2300 as a result of DBA 3 being down for tube repairs.
15	5/19/20 11:30 AM	5/23/19 12:45 AM	84.25	Waste was on the tipping floor on 05/19/20 at 1130 and was off the floor on 05/23/20 at 0045 as a result of DBA 4 being down for ram feeder repairs.

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated May 13, DEC approval of Covanta Niagara's May 12 request for disposal of non-hazardous waste (leftover scrap/rejected assembly line product waste: plastic, metal [wire & debris] in plastic spools & collection bags) from application 20-056.
- By letter dated May 15, DEC approval of Covanta Niagara's May 13 request for disposal of non-hazardous waste (bulked waste water solutions from a transfer station: water, organics [detergents, glycol, ink, latex/oil polymers & inorganic metals] & suspended solids) from application 20-057.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
5/17/2020	O2 Wet	5	2 1	5/17/2020	630	5/17/2020	815	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported during this period.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.

- Incidents & Emergencies

- On 05/12/20, DBA Boilers 3 & 4 tripped offline at 0940 and 0952 after Boiler 3 experienced a tube failure at 0939. Boiler 4 was brought back online by 0958 and Boiler 3 was offline by 1227. During this event, both the primary and secondary fans shut down for DBA 3 & 4. The Contingency Plan was activated, and a Level C was called due to a steam leak in the boiler. At 0944, a Level B was called to ensure that all persons were out of the boiler house. At 1049 both the Level B and C were lifted once the plant was back to operating at normal levels. Boiler 3 was repaired and came back online on 05/16/20 at 1113.
- On 05/17/20 at 1348, the Contingency Plan was activated, and a Level B was called due to a small fire in the waste bunker. At 1342, while the crane grapple was mixing waste in the bunker, a pile of waste was uncovered and caught on fire. The material on fire was unknown. Facility personnel extinguished it with a fire hose. As a precaution, the Fire Department was called at 1351. They arrived within a few minutes of being called. At 1430, the Fire Department left site without discharging their fire hoses, and at 1433, the Level B condition was lifted, and the plant was operating as normal. A fire watch was posted on the tipping floor for extra precaution.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.

- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Forty-four (44) rail cars arrived at Covanta at 1700 on 05/10/20. The last seven (7) rail cars were unloaded by 1659 on 05/13/20 due to the delivery of containers during non-working hours by RTIF employees. The Department was notified of the extra time required to unload the RTIF Containers.
  - RTIF Containers: Forty-two (42) rail cars arrived at Covanta at 2100 on 05/23/20. The last eight (8) rail cars were unloaded by 1559 on 05/26/20 due to the delivery of containers during non-working hours by RTIF employees. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped May 11, Covanta submitted a Covanta Niagara April 2020 Sanitary Report.



**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

Division of Air Resources, Region 9  
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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-12)

June 12, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: May 24, 2020 – June 06, 2020  
Dates Present at Site: May 27, 28 & June 01, 02, 04.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:**

DBA Boiler 3 was offline for tube repairs on 5/24/20 at 2359 and was brought back online on 05/26/20 at 0323. Waste was on the tipping floor on 05/27/20 at 0730 due to Boiler 3 being down for tube repairs. Waste was off the floor on 05/30/20 at 2030. On 06/03/20, a Town of Tonawanda Truck had a medium energy radiation spike of 86.4 cps, which is above Covanta’s trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. Waste was on the tipping floor on 06/03/20 at 1327 due to higher waste bunker inventory from DBA 3 being offline and the increase of Rail-to-Intermodal (RTIF) waste deliveries back to pre-COVID-19 levels. Waste was off the floor on 06/06/20 at 0030. For additional information, see section 10 below.

**Areas of Progress:**

Stack Testing for DBAs 3 & 4 was completed on 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 was completed on 06/04/20.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline for tube repairs on 5/24/20 at 2359 and was brought back online on 05/26/20 at 0323. Waste was on the tipping floor on 05/27/20 at 0730 due to Boiler 3 being down for tube repairs. Waste was off the floor on 05/30/20 at 2030. On 06/03/20, a Town of Tonawanda Truck had a medium energy radiation spike of 86.4 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. Waste was on the tipping floor on 06/03/20 at 1327 due to higher waste bunker inventory from DBA 3 being offline and the increase of Rail-to-Intermodal (RTIF) waste deliveries back to pre-COVID-19 levels. Waste was off the floor on 06/06/20 at 0030. Department was notified of the extra time required to unload the RTIF Containers that arrived on 06/02/20 as per Condition 16 of the Solid Waste Permit. Stack Testing for DBAs 3 & 4 was completed on 05/28/20. The Relative Accuracy Test Audits (RATAs) for Boilers 1, 3, 4 & 5 was completed on 06/04/20. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the May 24 to June 06, 2020 period:

<b>Bi-Weekly Period:</b>		<b>May 24 - June 06</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received ( <i>Includes RTIF</i> )		34,605	Tons
RTIF MSW Received		18,021	Tons
MSW Received (Average)		2,884	Tons/Day
MSW+NHIW+TMW Consumed (Total)		34,066	Tons
MSW+NHIW+TMW Consumed (Average)		2,433	Tons/Day
NHIW Received (Total)		7,876	Tons
NHIW Received (Average)		656	Tons/Day
Treated Medical Waste Received (Total)		476	Tons
Treated Medical Waste Received (Average)		40	Tons/Day
Ash Residue MSW (Total)		6,981	Tons
Ash Residue MSW (Average)		499	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	19,156	210	126
#2*	0	0	336
#3*	92,869	309	27
#4*	100,762	336	0
#5*	8,001	103	233
<b>Total Steam Generation (Klbs)</b>			<b>220,788</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
5/26/2020	SO <sub>2</sub>	3	2.0	5/26/2020	530	5/26/2020	648	Further information will be provided in the quarterly reports	Intermittent
6/2/2020	NO <sub>x</sub>	3	22.4	6/2/2020	530	6/2/2020	650	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill #2001259: On 05/26/20 at 0658, 3-gallons of hydraulic oil was spilled on to the concrete tipping floor inside the tipping hall when a hose on a truck failed. The spill was cleaned up with no sensitive receptors affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	5/27/20 7:30 AM	5/30/20 8:30 PM	85.00	Waste was on the tipping floor on 05/27/20 at 0730 due to Boiler 3 being down for tube repairs. Waste off the floor on 05/30/20 at 2030.
15	6/3/20 1 27 PM	6/6/20 12:30 AM	59.05	Waste was on the tipping floor on 06/03/20 at 1327 due to higher waste bunker inventory from DBA 3 being offline and the increase of Rail-to-Intermodal (RTIF) waste deliveries back to pre-COVID-19 levels. Waste was off the floor on 06/06/20 at 0030.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated May 29, DEC approval of Covanta Niagara's May 26 request for disposal of non-hazardous waste (rinse water from filter manufacturing process: water, dimethyl sulfoxide & butanol) from application 20-056.
- By letter dated May 29, DEC approval of Covanta Niagara's May 26 request for disposal of non-hazardous waste (product rinsings/cleanout from liquid handsoap manufacturing: water, glycerol, amines [c10-16-alkyldimethyl, N-oxides] & cetrimonium chloride) from application 20-056.

- By letter dated May 29, DEC approval of Covanta Niagara's May 15 request for disposal of non-hazardous waste (empty product containers from polymer manufacturing: empty supersacs, carbon black residue, pallets & wood) from application 20-056.
- By letter dated June 03, DEC approval of Covanta Niagara's June 01 request for disposal of non-hazardous waste (baghouse dust/floor sweepings from the compounding of rubber additives: tronox titanium dioxide [white pigment], pliolite S6B, octylated diphenylamines, dirt & plastic bags) from application 20-056.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
5/28/2020	O2 Wet	5	21.7	5/28/2020	630	5/29/2020	918	Further information will be provided in the quarterly reports.	No
6/5/2020	O2 Wet	5	24.2	6/5/2020	630	6/5/2020	916	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 06/03/20, a Town of Tonawanda Truck had a medium energy radiation spike of 86.4 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents & Emergencies
  - None were reported or observed during this period.

11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:

- Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
  - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
  - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  
- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
  
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Forty-eight (48) rail cars arrived at Covanta at 1205 on 06/02/20. The last nine (9) rail cars were unloaded by 1200 on 06/05/20 due to tipping floor congestion from waste on the floor, which resulted in increased offload times. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped May 29, Covanta re-submitted page 21 of the Covanta Niagara 2019 Emission Inventory.

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-13)

June 29, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: June 07, 2020 – June 20, 2020  
Dates Present at Site: June 09, 12, 15, & June 17.  
Facility Monitor: Anthony Poupalos, E.I.T. 

**Areas of Concern:**

Waste was on the tipping floor on 06/09/20 at 2030 and was off the floor on 06/13/20 at 1310. On 06/09/20, a sectioned off area of the waste bunker wall was observed during a routine inspection. The facility is in the process of obtaining quotes from contractors to make necessary repairs to an upper section of the waste bunker wall. Those repairs are expected to be completed in mid-July. DBA Boiler 4 was offline for tube repairs on 06/11/20 at 1739 and was brought back online on 06/13/20 at 0433. Waste was on the tipping floor on 06/15/20 at 1400 and was off the floor on 06/20/20 at 0330. The Town of Tonawanda Truck had a medium energy radiation spike on 06/03/20 is still in the designated holding area until its levels drop below acceptable limits. For additional information, see section 10 below.

**Areas of Progress:**

Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Waste was on the tipping floor on 06/09/20 at 2030 and was off the floor on 06/13/20 at 1310. On 06/09/20, a sectioned off area of the waste bunker wall was observed during a routine inspection. The facility is in the process of obtaining quotes from contractors to make necessary repairs to an upper section of the waste bunker wall. Those repairs are expected to be completed in mid-July. DBA Boiler 4 was offline for tube repairs on 06/11/20 at 1739 and was brought back online on 06/13/20 at 0433. Waste was on the tipping floor on 06/15/20 at 1400 and was off the floor on 06/20/20 at 0330. The Town of Tonawanda Truck had a medium energy radiation spike on 06/03/20 is still in the designated holding area until its levels drop below acceptable limits. For additional information, see section 10 below. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 06/07/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the June 07 to June 20, 2020 period:

<b>Bi-Weekly Period:</b>		<b>June 07 - June 20</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		33,141	Tons
RTIF MSW Received		21,538	Tons
MSW Received (Average)		2,762	Tons/Day
MSW+NHIW+TMW Consumed (Total)		32,577	Tons
MSW+NHIW+TMW Consumed (Average)		2,327	Tons/Day
NHIW Received (Total)		6,391	Tons
NHIW Received (Average)		533	Tons/Day
Treated Medical Waste Received (Total)		343	Tons
Treated Medical Waste Received (Average)		29	Tons/Day
Ash Residue MSW (Total)		6,992	Tons
Ash Residue MSW (Average)		499	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	4,170	37	299
#2*	0	0	336
#3*	99,689	336	0
#4*	88,540	302	34
#5*	12,728	193	143
<b>Total Steam Generation (Klbs)</b>			<b>205,127</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
6/8/2020	NOx	4	27.4	6/8/2020	545	6/8/2020	935	Further information will be provided in the quarterly reports.	Yes
6/2/2020	NOx	3	22.4	6/2/2020	530	6/2/2020	850	Further information will be provided in the quarterly reports.	Yes
6/12/2020	O2	4	27.4	6/12/2020	553	6/12/2020	933	Further information will be provided in the quarterly reports.	No
6/13/2020	O2	4	27.3	6/13/2020	553	6/13/2020	929	Further information will be provided in the quarterly reports.	Intermittent
6/15/2020	O2	3	27.0	6/15/2020	538	6/15/2020	855	Further information will be provided in the quarterly reports.	Yes
6/17/2020	NOx	3	26.9	6/17/2020	530	6/17/2020	850	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill #2002052: On 06/20/20 at 1300, 2 gallons of a glycol/water mixture from a truck leaked on to the asphalt. The spill was cleaned up with no sensitive receptors affected.
- Spill #2002075: On 06/20/20 at 0149, a hydraulic hose failed on a piece of equipment inside a building on a concrete floor. Approximately 120 gallons was released to the secondary containment with a minor amount next to the containment on the concrete floor. The spill was cleaned up with no sensitive receptors affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	6/9/20 8:30 PM	6/13/20 1:10 PM	88.67	Waste was on the tipping floor on 06/09/20 at 2030 and was off the floor on 06/13/20 at 1310.
15	6/15/20 2:00 PM	6/20/20 3:30 AM	106.50	Waste was on the tipping floor on 06/15/20 at 1400 and was off the floor on 06/20/20 at 0330

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated June 11, DEC approval of Covanta Niagara's June 09 request for disposal of non-hazardous waste (prescription medications from take back day) from application 20-062.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
6/9/2020	CO	1	25.9	6/9/2020	700	6/9/2020	807	Further information will be provided in the quarterly reports	No
6/9/2020	O2	1	26.1	6/9/2020	600	6/9/2020	822	Further information will be provided in the quarterly reports.	Yes
6/12/2020	CO	1	14.7	6/12/2020	600	6/12/2020	822	Further information will be provided in the quarterly reports.	Yes
6/12/2020	O2	1	12.6	6/12/2020	600	6/12/2020	615	Further information will be provided in the quarterly reports.	Yes

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
6/10/2020	O2 Wet	5	48.0	6/10/2020	630	6/11/2020	642	Further information will be provided in the quarterly reports	No
6/11/2020	O2 Wet	5	14.7	6/11/2020	630	6/11/2020	1555	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

#### 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/20/19. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

Radiation Detector Background Readings in Counts/Second (cps) [06/20/19]	Serial 1505LFM047 RTIF RAD Detector	Serial 1505LFM048 Inbound RAD Detector	Serial 1505LFM049 Outbound RAD Detector
Low Energy (20 - 99 keV):	5 cps	6 cps	5 cps
Medium Energy (100 - 400 keV):	12 cps	13 cps	12 cps
High Energy (>400 keV):	6 cps	6 cps	4 cps
5X Background Trigger Limit in Counts/Second (cps)	Serial 1505LFM047 RTIF RAD Detector	Serial 1505LFM048 Inbound RAD Detector	Serial 1505LFM049 Outbound RAD Detector
Low Energy (20 - 99 keV):	25 cps	30 cps	25 cps
Medium Energy (100 - 400 keV):	60 cps	65 cps	60 cps
High Energy (>400 keV):	30 cps	30 cps	20 cps

- On 06/03/20, a Town of Tonawanda Truck had a medium energy radiation spike of 86.4 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.

- Incidents, Emergencies & Long Term Repairs.
  - On 06/09/20 during a routine site inspection, a sectioned off portion of an alley that bisects the maintenance shop, the air compressor room and one (1) of the four (4) walls of the waste bunker was observed. The red taped area was dated 05/31/20 with the notation "Falling trash above". Approximately 30 feet up where the ceiling meets the bunker wall, it was observed that there are damaged sections of concrete that were repaired previously are starting to fail. The previously repaired sections of wall and patched with steel plates and bolted to the wall (approximately 6 feet in length and approximately 2 feet in width). Also, for additional reinforcement, jacks were used to further secure the previous repairs/patch.
    - After discussion with Covanta Niagara's Environmental Engineer, personnel in the facility's Operations had already scheduled a meeting with a contractor on 06/12/20 to further access the problem and the best way to address it. More details on addressing the two sections of the waste bunker wall are forthcoming as the facility determines the best course of action going forward. Repairs are expected to be completed in mid-July. The Department is continuing to monitor the sectioned off problem area and will be documenting any further deterioration.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.

- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Sixty-six (66) rail cars arrived at Covanta at 2000 on 06/07/20. The last three (3) rail cars were unloaded by 1200 on 06/10/20 due to the RTIF not being staffed when the containers were delivered. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped June 15, Covanta submitted a Covanta Niagara May Sanitary DMR.



**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-14)

July 10, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: June 21, 2020 – July 04, 2020  
Dates Present at Site: June 24, 26, 29, & July 01.  
Facility Monitor: Anthony Poupalos, E.I.T. *AP*

**Areas of Concern:**

Waste was on the tipping floor on 06/24/20 at 1436 and was off the floor on 06/28/20 at 0140 due to more consistent Rail-to-Intermodal Facility (RTIF) deliveries. DBA Boiler 3 was brought down for tube repairs on 06/26/20 at 1600 and came back online on 06/28/20 at 0001. Boiler 4 was brought down for tube repairs on 06/27/20 at 2335 and came back online on 06/28/20 at 2327. Waste was on the tipping floor on 06/30/20 at 1325 and off the floor on 07/03/20 at 1443 due to DBA 3 and 4 being down for tube repairs. The Town of Tonawanda Truck had a medium energy radiation spike on 06/03/20 was sent to the tipping floor on 06/30/20 after its levels dropped down below acceptable limits. For additional information, see section 10 below.

**Areas of Progress:**

Nothing to report.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

## **Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

### **1. Plant Activity Summaries**

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Waste was on the tipping floor on 06/24/20 at 1436 and was off the floor on 06/28/20 at 0140 due to more consistent Rail-to-Intermodal Facility (RTIF) deliveries. DBA Boiler 3 was brought down for tube repairs on 06/26/20 at 1600 and came back online on 06/28/20 at 0001. Boiler 4 was brought down for tube repairs on 06/27/20 at 2335 and came back online on 06/28/20 at 2327. Waste was on the tipping floor on 06/30/20 at 1325 and off the floor on 07/03/20 at 1443 due to DBA 3 and 4 being down for tube repairs. The Town of Tonawanda Truck had a medium energy radiation spike on 06/03/20 was sent to the tipping floor on 06/30/20 after its levels dropped down below acceptable limits. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 07/04/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below.

### **2. Plant Operation Summary**

- Below is the plant operation data for the June 21 to July 04, 2020 period:

<b>Bi-Weekly Period:</b>		<b>June 21 - July 04</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		30,021	Tons
RTIF MSW Received		17,807	Tons
MSW Received (Average)		2,502	Tons/Day
MSW+NHIW+TMW Consumed (Total)		30,888	Tons
MSW+NHIW+TMW Consumed (Average)		2,206	Tons/Day
NHIW Received (Total)		6,450	Tons
NHIW Received (Average)		537	Tons/Day
Treated Medical Waste Received (Total)		472	Tons
Treated Medical Waste Received (Average)		39	Tons/Day
Ash Residue MSW (Total)		6,132	Tons
Ash Residue MSW (Average)		438	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	9,463	91	245
#2*	0	0	336
#3*	90,478	304	32
#4*	92,872	313	23
#5*	14,446	214	122
<b>Total Steam Generation (Klbs)</b>			<b>207,259</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
6/27/2020	SO2	3	546.0	6/27/2020	1013	6/26/2020	546	Further information will be provided in the quarterly reports.	No
6/27/2020	CO, CO2	3	948.0	6/27/2020	1013	6/27/2020	615	Further information will be provided in the quarterly reports.	No

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill #2002115: On 06/22/20 at 1744, 25 gallons of hydraulic oil was released to a secondary containment inside a building. The spill was a result of human error and it cleaned up with no sensitive receptors affected.
- Spill #2002408: On 07/01/20 at 1210, approximately 1 quart of hydraulic oil was released to the pavement after a hydraulic hose on a piece of equipment failed. The spill was cleaned up with no sensitive receptors affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	6/24/20 2:36 PM	6/28/20 1:40 AM	83.07	Waste was on the tipping floor on 06/24/20 at 1435 and was off the floor on 06/28/20 at 0140 due to more consistent Rail-to-Intermodal Facility (RTIF) deliveries
15	6/30/20 1:25 PM	7/3/20 2:23 PM	72.97	Waste was on the tipping floor on 06/30/20 at 1325 and off the floor on 07/03/20 at 1443 due to DBA 3 and 4 being down for tube repairs

### 7. Non-Hazardous Industrial Waste (NHIW)

- No waste applications were submitted or processed during this period.

## 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
6/25/2020	NOx	1	1015.0	6/25/2020	1049	6/24/2020	600	Further information will be provided in the quarterly reports.	Intermittent
6/30/2020	O2	1	600.0	6/30/2020	1104	6/29/2020	546	Further information will be provided in the quarterly reports.	No

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

## 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

## 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 06/03/20, a Town of Tonawanda Truck had a medium energy radiation spike of 86.4 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. The truck was sent to the tipping floor on 06/30/20.
- **Brownfield Cleanup Project (BCP) Remediation**
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- **Monitoring Well No. 17 Issues**
  - Nothing to report.
- **Stormwater Management**
  - Nothing to report.
- **Incidents, Emergencies & Long Term Repairs.**
  - On 06/09/20 during a routine site inspection, a sectioned off portion of an alley that bisects the maintenance shop, the air compressor room and one (1) of the four (4) walls of the waste bunker was observed. The red taped area was dated 05/31/20 with the notation "Falling trash above". Approximately 30 feet up where the ceiling meets the bunker wall, it was observed that there are damaged sections of concrete that were repaired previously are starting to fail. The previously repaired sections of wall and patched with steel plates and bolted to the wall (approximately 6 feet in length and approximately 2 feet in width). Also, for additional reinforcement, jacks were used to further secure the previous repairs/patch.
    - After discussion with Covanta Niagara's Environmental Engineer, personnel in the facility's Operations had already scheduled a meeting with a contractor on 06/12/20 to further access the problem and the best way to address it. More details on addressing the two sections of the waste bunker wall are forthcoming as the facility determines the best course of action going forward. Repairs are expected to be completed in mid-July. The Department is continuing to monitor the sectioned off problem area and will be documenting any further deterioration.

## 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: forty-nine (49) rail cars arrived at Covanta at 1730 on 07/04/20. The last twenty-eight (28) rail cars were unloaded by 1800 on 07/07/20 due to the RTIF not being staffed when the containers were delivered. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped June 26, Covanta submitted a Covanta Site C932160 Work Plan for planting Trees and performing maintenance on the RTIF site.
- By email time stamped June 29, Covanta submitted a Covanta Niagara Total Loss of Ignition (TLI) Notification (ash sample analysis from a laboratory).
- By email time stamped June 30, Covanta submitted a Covanta Niagara Sodium Thiosulfate 2Q20 Update.



**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-15)

July 27, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: July 05, 2020 – July 18, 2020  
Dates Present at Site: July 08, 13, 15, & July 17.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:**

DBA Boiler 4 was offline on 07/06/20 at 1910 for tube repairs and came back online on 07/08/20 at 0829. Waste was on the tipping floor on 07/07/20 at 1723 and was off the floor on 07/11/20 at 0615 due to DBA 4 being down for repairs. Boiler 4 was offline on 07/14/20 at 1951 for additional tube repairs and was back online on 07/16/20 at 1203. Waste was on the tipping floor on 07/15/20 at 1000 and was off the floor on 07/17/20 at 0910 due to DBA 4 being down for unscheduled maintenance. For additional information, see section 10 below.

**Areas of Progress:**

Nothing to report.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 4 was offline on 07/06/20 at 1910 for tube repairs and came back online on 07/08/20 at 0829. Waste was on the tipping floor on 07/07/20 at 1723 and was off the floor on 07/11/20 at 0615 due to DBA 4 being down for repairs. Boiler 4 was offline on 07/14/20 at 1951 for additional tube repairs and was back online on 07/16/20 at 1203. Waste was on the tipping floor on 07/15/20 at 1000 and was off the floor on 07/17/20 at 0910 due to DBA 4 being down for unscheduled maintenance. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 07/11/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the July 05 to July 18, 2020 period:

<b>Bi-Weekly Period:</b>		<b>July 05 - July 18</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		28,919	Tons
RTIF MSW Received		16,827	Tons
MSW Received (Average)		2,410	Tons/Day
MSW+NHIW+TMW Consumed (Total)		29,776	Tons
MSW+NHIW+TMW Consumed (Average)		2,127	Tons/Day
NHIW Received (Total)		6,541	Tons
NHIW Received (Average)		545	Tons/Day
Treated Medical Waste Received (Total)		566	Tons
Treated Medical Waste Received (Average)		47	Tons/Day
Ash Residue MSW (Total)		6,048	Tons
Ash Residue MSW (Average)		432	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	10,957	99	237
#2*	0	0	336
#3*	101,046	336	0
#4*	77,831	259	77
#5*	17,138	234	102
<b>Total Steam Generation (Klbs)</b>			<b>206,971</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

4. Excursion Occurrences

- None were observed or reported during this period.

5. Spills/Cleanup

- Spill #2002890: On 07/14/20 at 1920, 12 gallons of hydraulic oil was released to the concrete floor area inside the DBA building when a hydraulic hose failed. The spill was cleaned up with no sensitive receptors affected.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	7/7/20 5:23 PM	7/11/20 6:15 AM	84.87	Waste was on the tipping floor on 07/07/20 at 1723 and was off the floor on 07/11/20 at 0615 due to DBA 4 being down for repairs.
15	7/15/20 10:00 AM	7/17/20 9:10 AM	48.83	Waste was on the tipping floor on 07/15/20 at 1000 and was off the floor on 07/17/20 at 0910 due to DBA 4 being down for unscheduled maintenance.

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated July 07, DEC approval of Covanta Niagara's June 29 request for disposal of non-hazardous waste (waste from auto scrap process where emissions are routed through a wet scrubber: skimmed sludge that is stored in tanks that include aluminum fines & residual oils) from application 20-063.
- By letter dated July 07, DEC approval of Covanta Niagara's July 01 request for disposal of non-hazardous waste (bulk cosmetic finished products in varying container & consumer packaged sizes: bulk lotions/shampoos/cosmetics, plastic & cardboard packaging) from application 20-064.
- By letter dated July 07, DEC approval of Covanta Niagara's June 25 request for disposal of non-hazardous waste (general trash & corrugated paperboard: plastic stock bottles, plastic bags, paper & a small portion of cafeteria waste) from application 20-065.

- By letter dated July 07, DEC approval of Covanta Niagara's July 01 request for disposal of non-hazardous waste (collection/seizure of illegal drugs, prescription medications & controlled substances confiscated from arrests) from application 20-066.
- By letter dated July 08, DEC approval of Covanta Niagara's July 02 request for disposal of non-hazardous waste (waste from plant closure: solar glass [silicates & aluminum oxide]) from application 20-067.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
7/9/2020	O2 Wet	5	31.0	7/9/2020	630	7/9/2020	1342	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- **Brownfield Cleanup Project (BCP) Remediation**
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- **Monitoring Well No. 17 Issues**
  - Nothing to report.
- **Stormwater Management**
  - Nothing to report.
- **Incidents, Emergencies & Long Term Repairs.**
  - On 06/09/20 during a routine site inspection, a sectioned off portion of an alley that bisects the maintenance shop, the air compressor room and one (1) of the four (4) walls of the waste bunker was observed. The red taped area was dated 05/31/20 with the notation "Falling trash above". Approximately 30 feet up where the ceiling meets the bunker wall, it was observed that there are damaged sections of concrete that were repaired previously are starting to fail. The previously repaired sections of wall and patched with steel plates and bolted to the wall (approximately 6 feet in length and approximately 2 feet in width). Also, for additional reinforcement, jacks were used to further secure the previous repairs/patch.
    - After discussion with Covanta Niagara's Environmental Engineer, personnel in the facility's Operations had already scheduled a meeting with a contractor on 06/12/20 to further access the problem and the best way to address it. More details on addressing the two sections of the waste bunker wall are forthcoming as the facility determines the best course of action going forward. Repairs are expected to be completed in mid-July. The Department is continuing to monitor the sectioned off problem area and will be documenting any further deterioration.
    - Due to unscheduled boiler repairs in July, repairs to the two sections of the waste bunker wall were tentatively rescheduled for 08/06/20 and 08/07/20.

## 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: thirty-six (36) rail cars arrived at Covanta at 1200 on 07/11/20. The last twenty-three (23) rail cars were unloaded by 0700 on 07/14/20 due to the RTIF not being staffed when the containers were delivered. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped July 06, Covanta submitted a Covanta Niagara June 2020 Monthly Sanitary Report.
- By email time stamped July 08, Covanta re-submitted the Covanta Niagara Application for APC Renewal.
- By email time stamped July 10, Covanta submitted a Covanta Niagara Semi Annual Ash Testing Parameters.
- By email time stamped July 17, Covanta submitted a Covanta Niagara Updated Closure Costs for its O&MM.



**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-16)

August 07, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: July 19, 2020 – August 01, 2020  
Dates Present at Site: July 22, 24, 27, & July 29.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:** Waste was on the tipping floor on 07/22/20 at 1303 and was off the floor on 07/25/20 at 1230 due to increased Rail-to-Intermodal Facility (RTIF) deliveries. For additional information, see section 10 below.

**Areas of Progress:** Partial siding replacement on the exterior of the Ash Load Out (ALO) building commenced the week of 07/27/2020 and was completed by 07/31/2020.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Waste was on the tipping floor on 07/22/20 at 1303 and was off the floor on 07/25/20 at 1230 due to increased Rail-to-Intermodal Facility (RTIF) deliveries. Partial siding replacement on the exterior of the Ash Load Out (ALO) building commenced the week of 07/27/2020 and was completed by 07/31/2020. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 07/26/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the July 19 to August 01, 2020 period:

<b>Bi-Weekly Period:</b>		<b>July 19 - August 01</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		30,376	Tons
RTIF MSW Received		17,520	Tons
MSW Received (Average)		2,531	Tons/Day
MSW+NHIW+TMW Consumed (Total)		31,068	Tons
MSW+NHIW+TMW Consumed (Average)		2,219	Tons/Day
NHIW Received (Total)		6,220	Tons
NHIW Received (Average)		518	Tons/Day
Treated Medical Waste Received (Total)		552	Tons
Treated Medical Waste Received (Average)		46	Tons/Day
Ash Residue MSW (Total)		7,241	Tons
Ash Residue MSW (Average)		517	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	0	0	336
#2*	0	0	336
#3**,**	97,114	336	0
#4**,**	99,624	336	0
#5**,**	9,616	221	115
<b>Total Steam Generation (Klbs)</b>			<b>206,353</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

\*\*On 0505 on 7/27/20, a CEMS server failed resulting in Boiler 5 data loss from 0505 – 0723. All other data has been recovered. Boiler 5, 0600 – 0700 steam flow is missing from computer failure. That will be reported as downtime. Steam flow on B3 and B4 recovered.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

### 4. Excursion Occurrences

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
85.0	Carbon Monoxide (COc): carbon monoxide emission limit for mass burn waterwall municipal waste combustor	3	07/22/20	0.50	100 ppm	132 ppm (1800 – 2000)	1 (4 hour block)	The Boiler 3 carbon monoxide reading was 132 ppm during the 1800 – 2000 compliance block on 7/22/20. The 4-hour permit limit is 100 ppm. The exceedance was a result of operator error. This information will be included with the next Quarterly Excess Emissions Report.

### 5. Spills/Cleanup

- None were observed or reported during this period.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	7/22/20 1:03 PM	7/25/20 12:30 PM	71.45	Waste was on the tipping floor on 07/22/20 at 1303 and was off the floor on 07/25/20 at 1230 due to increased Rail-to-Intermodal Facility (RTIF) deliveries.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated July 22, DEC approval of Covanta Niagara's July 20 request for disposal of non-hazardous waste (discarding of uncontaminated packaging supplies: paper bags & cardboard) from application 20-068.
- By letter dated July 23, DEC disapproval of Covanta Niagara's July 21 request for disposal of non-hazardous waste (wastewater from regulated medical waste that is processed through an autoclave: condensed steam from an autoclaved process) from application 20-069 DISAPP.
- By letter dated July 24, DEC approval of Covanta Niagara's July 23 request for disposal of non-hazardous waste (seized drugs/paraphernalia & excess medications) from application 20-070.

- By letter dated July 31, DEC approval of Covanta Niagara's July 29 request for disposal of non-hazardous waste (outdated/off-spec unused food defoamer: foodgrade silicone defoamer [polydimethyl-siloxane polymer]) from application 20-071.
- By letter dated July 31, DEC approval of Covanta Niagara's July 29 request for disposal of non-hazardous waste (waste from the assembly of portable ventilators: plastic/hdpe scrap shipped in boxes) from application 20-072.

#### 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

#### 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

#### 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- **Brownfield Cleanup Project (BCP) Remediation**
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- **Monitoring Well No. 17 Issues**
  - Nothing to report.
- **Stormwater Management**
  - Nothing to report.
- **Incidents, Emergencies & Long-Term Repairs.**
  - On 06/09/20 during a routine site inspection, a sectioned off portion of an alley that bisects the maintenance shop, the air compressor room and one (1) of the four (4) walls of the waste bunker was observed. The red taped area was dated 05/31/20 with the notation "Falling trash above". Approximately 30 feet up where the ceiling meets the bunker wall, it was observed that there are damaged sections of concrete that were repaired previously are starting to fail. The previously repaired sections of wall and patched with steel plates and bolted to the wall (approximately 6 feet in length and approximately 2 feet in width). Also, for additional reinforcement, jacks were used to further secure the previous repairs/patch.
    - After discussion with Covanta Niagara's Environmental Engineer, personnel in the facility's Operations had already scheduled a meeting with a contractor on 06/12/20 to further access the problem and the best way to address it. More details on addressing the two sections of the waste bunker wall are forthcoming as the facility determines the best course of action going forward. Repairs are expected to be completed in mid-July. The Department is continuing to monitor the sectioned off problem area and will be documenting any further deterioration.
    - Due to unscheduled boiler repairs in July, repairs to the two sections of the waste bunker wall were tentatively rescheduled for 08/06/20 and 08/07/20.

## 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: seventy-two (72) rail cars arrived at Covanta at 2000 on 07/26/20. The last twelve (12) rail cars were unloaded by 2000 on 07/29/20 due to the RTIF not being staffed when the containers were delivered. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped July 21, Covanta submitted a Covanta Niagara TLI Report.
- By email time stamped July 21, Covanta submitted the Covanta Niagara 2Q20 Solid Waste Report.
- By email time stamped July 21, Covanta re-submitted a corrected version of the Covanta Niagara Application for APC Renewal
- By email time stamped July 27 Covanta submitted a Covanta Niagara DBA 3 and DBA 4 RATA Report 2020.
- By email time stamped July 27 Covanta submitted a Covanta Niagara 2Q20 Excess Emission Report.
- By email time stamped July 27 Covanta submitted a Covanta Niagara 2Q20 Fuel Summary Report.
- By email time stamped July 28 Covanta submitted a Covanta Niagara 1H20 MACT Report.
- By email time stamped July 29 Covanta submitted a Covanta Niagara 1H20 Title V Report.
- By email time stamped July 29 Covanta submitted a Covanta Niagara 2020 RATA Reports (Boiler 1 & 5).



# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-17)

August 25, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: August 02, 2020 – August 15, 2020  
Dates Present at Site: August 05, 07, 10, 12 & August 14.  
Facility Monitor: Anthony Poupalos, E.I.T. 

### Areas of Concern:

Waste was on the tipping floor on 08/05/20 at 1500 and was off the floor on 08/08/20 at 0910 to facilitate bunker wall access for concrete repairs scheduled to begin on 08/07/20. On 08/07/20 a Modern Truck had a medium energy radiation spike above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. DBA Boiler 3 was brought down for tube repairs on 08/09/20 at 2002 and came back online on 08/12/20 at 2222. Waste was on the tipping floor on 08/12/20 at 1240 due to DBA 3 being down and was off the floor on 08/14/20 at 2230. For additional information, see section 10 below.

### Areas of Progress:

Siding replacement on the exterior of the Ash Load Out (ALO) building (south side) is ongoing and is nearing completion. The portion of the concrete bunker wall that was damaged and sectioned off on 06/17/20 due to falling garbage was repaired by 08/10/20.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Waste was on the tipping floor on 08/05/20 at 1500 and was off the floor on 08/08/20 at 0910 to facilitate bunker wall access for concrete repairs scheduled to begin on 08/07/20. On 08/07/20 a Modern Truck had a medium energy radiation spike above Covanta’s trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. DBA Boiler 3 was brought down for tube repairs on 08/09/20 at 2002 and came back online on 08/12/20 at 2222. Waste was on the tipping floor on 08/12/20 at 1240 due to DBA 3 being down and was off the floor on 08/14/20 at 2230. Siding replacement on the exterior of the Ash Load Out (ALO) building (south side) is ongoing and is nearing completion. The portion of the concrete bunker wall that was damaged and sectioned off on 06/17/20 due to falling garbage was repaired by 08/10/20. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the August 02 to August 15, 2020 period:

<b>Bi-Weekly Period:</b>		<b>August 02 - August 15</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		29,812	Tons
RTIF MSW Received		15,846	Tons
MSW Received (Average)		2,484	Tons/Day
MSW+NHIW+TMW Consumed (Total)		28,309	Tons
MSW+NHIW+TMW Consumed (Average)		2,022	Tons/Day
NHIW Received (Total)		6,047	Tons
NHIW Received (Average)		504	Tons/Day
Treated Medical Waste Received (Total)		507	Tons
Treated Medical Waste Received (Average)		42	Tons/Day
Ash Residue MSW (Total)		6,065	Tons
Ash Residue MSW (Average)		433	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	17,165	180	156
#2*	0	0	336
#3*	74,243	262	74
#4*	99,656	336	0
#5*	20,127	208	128
<b>Total Steam Generation (Klbs)</b>			<b>211,191</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

### 4. Excursion Occurrences

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
24.0	SDA/Acid Gas Scrubber Outlet Temperature; Shall not exceed 30 degrees F above the maximum 4-hour block average temperature measured at the inlet to the baghouse during the most recent dioxins/furans test demonstrating compliance with the emissions limits of the permit.	4	08/12/20	1.73	360° F	360° F (2000 - 2359)	1 (4 hour block)	During the 2000 - 2359 compliance block on 8/12/20, the Boiler 4 SDA outlet temperature was 362°F resulting from multiple atomizer failures. The excursions occurred from 2028 - 2136 and 2211 - 2251. The limit is 360°F. An investigation is underway to evaluate the root cause of this incident and it will be included with the next Quarterly Excess Emission Report.

### 5. Spills/Cleanup

- Spill #2003565: On 08/03/20 at 0615, approximately 10 gallons of hydraulic oil was released to the pavement when a truck hose failed. The spill was cleaned up and no sensitive receptors were affected.
- Spill #2003648: On 08/04/20 at 1638, approximately 10 gallons of oil was released to the concrete pavement on the tipping floor when a hydraulic hose failed. It is cleaned up and no sensitive reset were affected.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	8/5/20 3:00 PM	8/8/20 9:10 AM	66.17	Waste was on the tipping floor as of 08/05/20 at 1500 to facilitate bunker access/concrete repairs scheduled for Friday, 08/07 - Sunday, 08/09. Covanta requested refuse on the tipping floor through Monday, 08/10 following completion of that work. Waste was off the tipping floor on 08/08/20 at 0910.
15	8/12/20 12:40 PM	8/14/20 10:30 PM	57.83	Waste was on the tipping floor on 8/12/20 at 1240 due to Boiler 3 being offline earlier week. Waste was off the floor on 08/14/20 at 2230.

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated August 06, DEC approval of Covanta Niagara's July 29 request for disposal of non-hazardous waste (non-haz waste from aqueous inks/toners & cleaning solutions packaged in drums & totes: ink/toner pigments [black/cyan/magenta/yellow] water, aliphatic alcohols & carbon black) from application 20-073.
- By letter dated August 07, DEC approval of Covanta Niagara's August 03 request for disposal of non-hazardous waste (residential recycling center non-recyclables: styrofoam, plastic bags) from application 20-074.
- By letter dated August 12, DEC approval of Covanta Niagara's August 11 request for disposal of non-hazardous waste (confiscated/seized material/evidence: paper, plastic, drugs & weapons [no ammunition]) from application 20-075.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
8/3/2020	CO2/NOx/O2	5	4.0	8/3/2020	1011	8/3/2020	1041	Further information will be provided in the quarterly reports.	Yes
8/8/2020	NOx	5	27.0	8/8/2020	630	8/8/2020	935	Further information will be provided in the quarterly reports.	Intermittent
8/10/2020	CO2	5	2.4	8/10/2020	656	8/10/2020	906	Further information will be provided in the quarterly reports.	Yes
8/10/2020	NOx	5	26.4	8/10/2020	656	8/10/2020	902	Further information will be provided in the quarterly reports.	Yes
8/10/2020	O2 Dry/Wet	5	2.4	8/10/2020	656	8/10/2020	906	Further information will be provided in the quarterly reports.	Yes

8/13/2020	CO2	5	4.0	8/13/2020	1310	8/13/2020	1354	Further information will be provided in the quarterly reports	Intermittent
8/13/2020	NOx	5	7.2	8/13/2020	937	8/13/2020	1350	Further information will be provided in the quarterly reports	Intermittent
8/13/2020	O2 Dry	5	16.8	8/13/2020	937	8/14/2020	642	Further information will be provided in the quarterly reports	Intermittent
8/13/2020	O2 Wet	5	7.2	8/13/2020	937	8/13/2020	1354	Further information will be provided in the quarterly reports	Intermittent
8/14/2020	O2 Wet	5	22.2	8/14/2020	630	8/14/2020	1105	Further information will be provided in the quarterly reports.	No

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

#### 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy ( &gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy ( &gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 08/07/20 a Modern Truck had a medium energy radiation spike of 92 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.

- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - On 06/09/20 during a routine site inspection, a sectioned off portion of an alley that bisects the maintenance shop, the air compressor room and one (1) of the four (4) walls of the waste bunker was observed. The red taped area was dated 05/31/20 with the notation "Falling trash above". Approximately 30 feet up where the ceiling meets the bunker wall, it was observed that there are damaged sections of concrete that were repaired previously are starting to fail. The previously repaired sections of wall and patched with steel plates and bolted to the wall (approximately 6 feet in length and approximately 2 feet in width). Also, for additional reinforcement, jacks were used to further secure the previous repairs/patch.
    - After discussion with Covanta Niagara's Environmental Engineer, personnel in the facility's Operations had already scheduled a meeting with a contractor on 06/12/20 to further assess the problem and the best way to address it. More details on addressing the two sections of the waste bunker wall are forthcoming as the facility determines the best course of action going forward. Repairs are expected to be completed in mid-July. The Department is continuing to monitor the sectioned off problem area and will be documenting any further deterioration.
    - Due to unscheduled boiler repairs in July, repairs to the two sections of the waste bunker wall were tentatively rescheduled for 08/06/20 and 08/07/20.
    - The bunker wall concrete repairs began on 08/07/20 and were completed by 08/10/20.
  - On 8/14/20 at 1328, the Contingency Plan was activated and a Level C was called in response to a fire in the Boiler 3 sifting hopper. It was extinguished with water and at 1347, and the Level C was called off. The fire department was not called and the boilers ran normally during that time.
  - On 8/19/20 at 1433, the Contingency Plan was activated and a Level C was called in response to a hopper fire in the DBA building. It was contained by 1452, and the Level C was called off. The fire department was not called and the boilers ran normally during that time.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.

- All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - Nothing to report for this period.

## 12. Reports and Other Correspondence

- By email time stamped August 05, Covanta submitted a Covanta Niagara 1H20 Ash Report.
- By email time stamped August 11, Covanta submitted the Covanta Niagara 2020 Stack Test Report and Cover Letter.
- By email time stamped August 14, Covanta submitted the Covanta Niagara July 2020 Monthly Sanitary Report



# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-18)

September 10, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: August 16, 2020 – August 29, 2020  
Dates Present at Site: August 05, 07, 10, 12 & August 14.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

On 8/19/20 at 1433, the Contingency Plan was activated, and a Level C was called in response to a hopper fire in the DBA building. The fire was extinguished by 1452, and the Level C was called off. The Modern Truck that arrived on 08/07/20 that had a radiation spike above Covanta's trigger limit (5x background) was sent to the tipping floor on 08/28/20 after its levels dropped below acceptable limits. For additional information, see section 10 below.

### Areas of Progress:

Siding replacement on the exterior of the Ash Load Out (ALO) building (south side) is ongoing and is nearing completion.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. On 8/19/20 at 1433, the Contingency Plan was activated, and a Level C was called in response to a hopper fire in the DBA building. The fire was extinguished by 1452, and the Level C was called off. The Modern Truck that arrived on 08/07/20 that had a radiation spike above Covanta's trigger limit (5x background) was sent to the tipping floor on 08/28/20 after its levels dropped below acceptable limits. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 08/18/20 as per Condition 16 of the Solid Waste Permit. For additional information, see section 10 below. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the August 16 to August 29, 2020 period:

<b>Bi-Weekly Period:</b>		<b>August 16 - August 29</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		32,629	Tons
RTIF MSW Received		18,113	Tons
MSW Received (Average)		2,719	Tons/Day
MSW+NHIW+TMW Consumed (Total)		35,089	Tons
MSW+NHIW+TMW Consumed (Average)		2,506	Tons/Day
NHIW Received (Total)		6,788	Tons
NHIW Received (Average)		566	Tons/Day
Treated Medical Waste Received (Total)		579	Tons
Treated Medical Waste Received (Average)		48	Tons/Day
Ash Residue MSW (Total)		7,292	Tons
Ash Residue MSW (Average)		521	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	0	0	336
#2*	0	0	336
#3*	102,386	336	0
#4*	99,682	336	0
#5*	12,607	271	65
<b>Total Steam Generation (Klbs)</b>			<b>214,674</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- None were observed or reported during this period.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:
  - None were observed or reported during this period.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated August 20, DEC approval of Covanta Niagara's August 14 request for disposal of non-hazardous waste (packaging waste for the pharm/research industry involving amino acid, salts, proteins and bases used to formulate cell culture media: packaging material, plastics, wood scrap, metal banding, office/cafeteria waste) from application 20-076.
- By letter dated August 20, DEC approval of Covanta Niagara's August 17 request for disposal of non-hazardous waste (evidence & confiscated items from seizure: records, files & weapons [no ammunition]) from application 20-077.

### 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.

- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
8/16/2020	O2 Dry	5	22.5	8/16/2020	630	8/16/2020	1109	Further information will be provided in the quarterly reports	Yes
8/18/2020	NOx	5	27.9	8/18/2020	630	8/18/2020	1031	Further information will be provided in the quarterly reports.	Intermittent
8/18/2020	O2 Dry	5	27.9	8/18/2020	630	8/18/2020	1035	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

Radiation Detector Background Readings in Counts/Second (cps)	Serial 1505LFM047 RTIF RAD Detector	Serial 1505LFM048 Inbound RAD Detector	Serial 1505LFM049 Outbound RAD Detector
Low Energy (20 - 99 keV):	5 cps	6 cps	5 cps
Medium Energy (100 - 400 keV):	12 cps	13 cps	12 cps
High Energy (>400 keV):	6 cps	6 cps	4 cps
5X Background Trigger Limit in Counts/Second (cps)	Serial 1505LFM047 RTIF RAD Detector	Serial 1505LFM048 Inbound RAD Detector	Serial 1505LFM049 Outbound RAD Detector
Low Energy (20 - 99 keV):	25 cps	30 cps	25 cps
Medium Energy (100 - 400 keV):	60 cps	65 cps	60 cps
High Energy (>400 keV):	30 cps	30 cps	20 cps

- On 08/07/20 a Modern Truck had a medium energy radiation spike of 92 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits. The truck was sent to the tipping floor on 08/28/20.

- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - On 8/19/20 at 1433, the Contingency Plan was activated, and a Level C was called in response to a hopper fire in the DBA building. It was extinguished by 1452, and the Level C was called off. The fire department was not called, and the boilers ran normally during that time. The Department was notified of the Contingency Plan activation.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.

- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Thirty-six (36) rail cars arrived at Covanta on 08/18/20 at 1200. The last four (4) rail cars were unloaded by 1415 on 08/20/20 due to the RTIF staff prioritizing unloading cars from Sunday first. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped August 20, Covanta submitted the Covanta Niagara Incineration Commitment Letter to the Department.
- By email time stamped August 24, Covanta submitted a Covanta Niagara 3Q20 Sanitary Report.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-19)

September 22, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: August 30, 2020 – September 12, 2020  
Dates Present at Site: September 02, 09, & September 11.  
Facility Monitor: Anthony Poupalos, E.I.T. 

### Areas of Concern:

On 09/05/20 at 0535, DBA 3 Boiler 3 experienced a smoking feed chute from its insulation. The area was rinsed down with water. Other Facility operations and areas were not affected. The Contingency Plan was not activated, and the Fire Department was not called. The Facility tripped offline on 09/06/20 at 2057, due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. The Contingency Plan was activated, and a Level C was called. The Level C was called off at 2230. On 09/07/20 at 2004, DBA 4 came back online and on 09/08/20 at 0229, DBA 3 came back online. DBA 3 came offline on 09/09/20 at 0952 for tube, and ash extractor repairs and came back online on 09/11/20 at 2039. Waste was on the tipping floor on 09/08/20 at 2130 due to the boilers being offline during this period and was off the floor on 09/12/20 at 0910. For additional information, see section 10 below.

### Areas of Progress:

Siding replacement on the exterior of the Ash Load Out (ALO) building (south side) is completed. Equipment and materials have been arriving on site in preparation for the DBA Boiler 3 maintenance outage scheduled to begin on 09/20/20.



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The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. On 09/05/20 at 0535, DBA 3 Boiler 3 experienced a smoking feed chute from its insulation. The area was rinsed down with water. Other Facility operations and areas were not affected. The Contingency Plan was not activated, and the Fire Department was not called. The Facility tripped offline on 09/06/20 at 2057, due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. The Contingency Plan was activated, and a Level C was called. The Level C was called off at 2230. On 09/07/20 at 2004, DBA 4 came back online and on 09/08/20 at 0229, DBA 3 came back online. DBA 3 came offline on 09/09/20 at 0952 for tube, and ash extractor repairs and came back online on 09/11/20 at 2039. Waste was on the tipping floor on 09/08/20 at 2130 due to the boilers being offline during this period and was off the floor on 09/12/20 at 0910. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 09/07/20 as per Condition 16 of the Solid Waste Permit. Siding replacement on the exterior of the Ash Load Out (ALO) building (south side) is completed. Equipment and materials have been arriving on site in preparation for the DBA Boiler 3 maintenance outage scheduled to begin on 09/20/20. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the August 30 to September 12, 2020 period:

<b>Bi-Weekly Period:</b>		<b>August 30 - September 12</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		31,028	Tons
RTIF MSW Received		17,651	Tons
MSW Received (Average)		2,586	Tons/Day
MSW+NHIW+TMW Consumed (Total)		27,868	Tons
MSW+NHIW+TMW Consumed (Average)		1,991	Tons/Day
NHIW Received (Total)		5,427	Tons
NHIW Received (Average)		452	Tons/Day
Treated Medical Waste Received (Total)		322	Tons
Treated Medical Waste Received (Average)		27	Tons/Day
Ash Residue MSW (Total)		5,814	Tons
Ash Residue MSW (Average)		415	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	13,938	110	226
#2*	0	0	336
#3*	60,375	209	127
#4*	92,503	313	23
#5*	18,867	214	122
<b>Total Steam Generation (Klbs)</b>			<b>185,683</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
9/7/2020	CO	3	34.4	9/7/2020	530	9/7/2020	1850	Further information will be provided in the quarterly reports.	No

### 4. Excursion Occurrences

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
85.0	Carbon Monoxide (COc): carbon monoxide emission limit for mass burn waterwall municipal waste combustor.	3	09/04/20	2:10	100 ppm	4,000 ppm (1600 – 2000)	1 (4 hour block)	On 09/04/20 at 1524, Boiler 3 suffered a tube failure resulting in Primary and Secondary Air Fans shutting down. The 1600 – 2000 CO compliance block was 4,000 ppm from smoldering on the grates until the boiler was offline at 1802. The boiler was repaired and back online at 0839 on 9/6/20. This information will be included with the next Quarterly Excess Emissions Report.
85.0	Carbon Monoxide (COc): carbon monoxide emission limit for mass burn waterwall municipal waste combustor.	3	09/06/20	2:50	100 ppm	1,451 ppm (2000 – 2359)	1 (4 hour block)	On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller grates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online. This information will be included with the next Quarterly Excess Emissions Report.
24.0	SDA/Acid Gas Scrubber Outlet Temperature: Shall not exceed 30 degrees F above the maximum 4-hour block average temperature measured at the inlet to the baghouse during the most recent dioxins/furans test demonstrating compliance with the emissions limits of the permit.	3	09/06/20	2:50	Stack Tested SDA Temp Compliance Block Required: 363° F	399° F (2000 – 2359)	1 (4 hour block)	On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller grates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online. This information will be included with the next Quarterly Excess Emissions Report.

27.0	<p><b>Compliance Certification - Intermittent Emission Testing:</b> Compliance with mercury emission limits shall be based on annual stack test by USEPA test Method 29 (40 CFR 80, Appendix A) and must be acceptable by the commissioner. 2. The permittee shall install, operate and maintain a carbon adsorption injection system or other system for the control of mercury emissions from each furnace. The mercury control system shall include a method to monitor the flow rate of the adsorbing agent or chemical reagents.</p>	4	09/06/20	2.10	Stack Tested Minimum Block Average Required: 23.4 lbs/hr	17.3 lbs/hr (1200 - 1800)	1 (6 hour block)	<p>On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller gates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online. This information will be included with the next Quarterly Excess Emissions Report</p>
24.0	<p><b>SDA/Acid Gas Scrubber Outlet Temperature:</b> Shall not exceed 30 degrees F above the maximum 4-hour block average temperature measured at the inlet to the baghouse during the most recent dioxins/furans test demonstrating compliance with the emissions limits of the permit.</p>	4	09/06/20	2.50	Stack Tested SDA Temp Compliance Block Required: 360° F	389° F (2000 - 2359)	1 (4 hour block)	<p>On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller gates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online. This information will be included with the next Quarterly Excess Emissions Report.</p>
85.0	<p><b>Carbon Monoxide (COc):</b> carbon monoxide emission limit for mass burn waterwall municipal waste combustor.</p>	4	09/06/20	2.80	100 ppm	544 ppm (2000 - 2359)	1 (4 hour block)	<p>On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller gates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online. This information will be included with the next Quarterly Excess Emissions Report.</p>
85.0	<p><b>Carbon Monoxide (COc):</b> carbon monoxide emission limit for mass burn waterwall municipal waste combustor.</p>	3 & 4	09/07/20	2.30 & 2.30	100 ppm	4,000 ppm (0000 - 0400) & 4,000 ppm (0000 - 0400)	1 (4 hour block)	<p>On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller gates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online. This information will be included with the next Quarterly Excess Emissions Report</p>

5. Spills/Cleanup

- Spill #2005263: On 09/09/20 at 1150, 3-gallons of hydraulic oil was released to the pavement when a hose on the street sweeper failed. No sensitive receptors were affected, and the spill was cleaned up.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	9/8/20 9:30 PM	9/12/20 9:10 AM	83.67	Waste was on the tipping floor on 09/08/20 at 2130 and off the floor on 09/12/20 at 0910 due to the boilers being offline during this period

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated September 03, DEC approval of Covanta Niagara's August 25 request for disposal of non-hazardous waste (mill sludge generated from the aluminum rolling process: technical white oil, aluminum silicate, ferric oxide, aluminum oxide, coolant oils, aluminum & dirt) from application 20-078.
- By letter dated September 04, DEC approval of Covanta Niagara's September 03 request for disposal of non-hazardous waste (expired & over-the-counter (OTC) medications generated at DEA Take-Back-Events) from application 20-079.
- By letter dated September 04, DEC approval of Covanta Niagara's September 03 request for disposal of non-hazardous waste (DEA controlled drugs collected during Take-Back-Events: prescription drugs) from application 20-080.

8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.

- Incidents, Emergencies & Long-Term Repairs.
  - On 09/05/20 at 0535, DBA 3 Boiler 3 experienced a smoking feed chute from its insulation. The area was rinsed down with water. Other Facility operations and areas were not affected. The Contingency Plan was not activated, and the Fire Department was not called.
  - On 09/06/20 at 2057, the Facility tripped offline due to an electrical component failure resulting in Boilers 3, 4, and 5 to trip offline due to not having electrical power. As a result of the Black Plant event from the lack of power, a Level C Contingency Plan was activated. The Level C was called off on at 2230 when power and lights had been restored. DBA Boilers 3, and 4 were offline on 09/07/20 at 0218 when fire was off the roller grates. On 09/07/20 at 2004, DBA 4 came back online. On 09/08/20 at 0229, DBA 3 came back online.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.

- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Thirty-four (34) rail cars arrived at Covanta on 09/07/20 at 1300. The last fourteen (14) rail cars were unloaded by 1300 on 09/10/20 due to increased rail deliveries that the RTIF staff were working to unload. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped September 02, Covanta submitted an email inquiry pertaining to the status of a closure cost response letter from the Department.
- By email time stamped August 24, Covanta submitted a Covanta Niagara 3Q20 Sanitary Report.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-20)

October 08, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: September 13, 2020 – September 26, 2020  
Dates Present at Site: September 16, 23, & September 25.  
Facility Monitor: Anthony Poupalos, E.I.T. 

### Areas of Concern:

On 09/20/20 at 1931, DBA Boiler 3 was brought down for its scheduled maintenance outage and came back online from its outage on 10/06/20. The Contingency Plan was activated on 09/20/20 at 2027 in response to a failed electrical component within the facility. The component failure resulted in a partial loss of plant power resulting in a temporary facility black out and for DBA Boiler 4 to trip offline. Power was restored and Boiler 4 was restarted at 2315. As a result of the maintenance outage, waste was on the tipping floor on 09/24/20 at 1254 and was off the floor on 09/25/20 at 1449. For additional information, see section 10 below.

### Areas of Progress:

Additional personnel and contractors were onsite for the scheduled boiler outage. Equipment and materials are still arriving on site and are being used for the outage. A new power transformer and power control shack was installed on the northern side of the facility adjacent to the maintenance shop during this period.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. On 09/20/20 at 1931, DBA Boiler 3 was brought down for its scheduled maintenance outage and came back online from its outage on 10/06/20. The Contingency Plan was activated on 09/20/20 at 2027 in response to a failed electrical component within the facility. The component failure resulted in a partial loss of plant power resulting in a temporary facility black out and for DBA Boiler 4 to trip offline. Power was restored and Boiler 4 was restarted at 2315. As a result of the maintenance outage, waste was on the tipping floor on 09/24/20 at 1254 and was off the floor on 09/25/20 at 1449. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 09/13/20 as per Condition 16 of the Solid Waste Permit. Additional personnel and contractors were onsite for the scheduled boiler outage. Equipment and materials are still arriving on site and are being used for the outage. A new power transformer and power control shack was installed on the northern side of the facility adjacent to the maintenance shop during this period. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the September 13 to September 26, 2020 period:

<b>Bi-Weekly Period:</b>		<b>September 13 - September 26</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		23,957	Tons
RTIF MSW Received		15,322	Tons
MSW Received (Average)		1,996	Tons/Day
MSW+NHIW+TMW Consumed (Total)		25,427	Tons
MSW+NHIW+TMW Consumed (Average)		1,816	Tons/Day
NHIW Received (Total)		5,996	Tons
NHIW Received (Average)		500	Tons/Day
Treated Medical Waste Received (Total)		627	Tons
Treated Medical Waste Received (Average)		52	Tons/Day
Ash Residue MSW (Total)		6,028	Tons
Ash Residue MSW (Average)		431	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	22,401	200	136
#2*	0	0	336
#3*	54,626	188	148
#4*	97,857	336	0
#5*	19,266	208	128
<b>Total Steam Generation (Klbs)</b>			<b>194,150</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

### 4. Excursion Occurrences

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
85.0	Carbon Monoxide (COc): carbon monoxide emission limit for mass burn waterwall municipal waste combustor	4	09/20/20	0.63	100 ppm	267 ppm (2000 - 2359)	1 (4 hour block)	A Level C contingency plan activation occurred from 1930 to 2027 on 9/20/20 in response to a failed electrical component within the facility. It resulted in a partial loss of plant power causing a temporary black out and Boiler 4 to trip off. When that happened, the Boiler 4 primary and secondary air fans shut down. The induced draft fan remained running, and there was smoldering on the grates until 2039. Power was restored, and the boiler was restarted at 2315. The 9/20/20, 2000 - 2359 carbon monoxide compliance block was 267 ppm. This will be included with the next Quarterly Excess Emission Report.

### 5. Spills/Cleanup

- Spill #2005694: On 09/23/20 at 0501, 1-gallon of diesel fuel was spilled on to the pavement. No sensitive receptors were affected, and the spill was cleaned up.

### 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (hrs)	Remarks
15	9/24/20 12:54 PM	9/25/2020 2:48:00 9M	25.92	On 09/20/20 at 1931, DBA Boiler 3 was brought down for its scheduled maintenance outage and came back online from its outage on 10/06/20. As a result of the maintenance outage, waste was on the tipping floor on 09/24/20 at 1254 and was off the floor on 09/25/20 at 1449.

### 7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated September 23, DEC approval of Covanta Niagara's September 18 request for disposal of non-hazardous waste (paper label trim waste from the printing and splicing of bales: paper & plastic-polypropylene) from application 20-081.

- By letter dated September 24, DEC approval of Covanta Niagara's September 18 request for disposal of non-hazardous waste (waste from the manufacturing antioxidant for rubber compounding: palletized wrapped hydroquinone supersacks, paper towels, break room trash, wood pallets, spent soda ash supersacks & empty triple rinsed plastic drums/pails) from application 20-082.
  - By letter dated September 24, DEC approval of Covanta Niagara's September 18 request for disposal of non-hazardous waste (packaging/plant waste from the manufacturing of corian sheets that are saw cut & sand finished: RCRA empty fiber drums/plastic lids, packaging [film, cardboard OOC, filter paper], wood [broken pallets], sandpaper scrap with corian dust/shavings) from application 20-083.
  - By letter dated September 24, DEC approval of Covanta Niagara's September 18 request for disposal of non-hazardous waste (waste generated from the packaging process of finished goods: molded polystyrene [carrier/cover tape] & polyethylene terephthalate) from application 20-084.
  - By letter dated September 24, DEC approval of Covanta Niagara's September 16 request for disposal of non-hazardous waste (virgin unused, outdated/off-spec products delivered on pallets: airase 4655, airase 5700, carbowet GA-200, silfoam SE23 food, sufrynol DF-110C, sufrynol 485W, sufrynol DF-178, vestamelt 970 powder, vestamid X7293 natural, vestosint 1111 silver) from application 20-085.
  - By letter dated September 30, DEC approval of Covanta Niagara's September 29 request for disposal of non-hazardous waste (residential pharmaceutical waste collection program: Rx takeback) from application 20-086.
8. Energy from Waste (EFW) Boilers
- Out of Control Data for EFW CEMS Monitoring
    - None were observed or reported during this period.
  - EFW Operating Summary
    - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
    - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - AF Source Inspection
    - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
9/13/2020	O2 Wet	5	48.0	9/13/2020	630	9/14/2002	642	Further information will be provided in the quarterly reports.	No
9/15/2020	O2 Wet	5	48.0	9/15/2020	630	9/16/2020	642	Further information will be provided in the quarterly reports.	No

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.

- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - The Contingency Plan was activated on 09/20/20 at 2027 in response to a failed electrical component within the facility. The component failure resulted in a partial loss of plant power resulting in a temporary facility black out and for DBA Boiler 4 to trip offline. When DBA 4 tripped, the primary and secondary fans shutdown resulting in smoldering on the roller-grates, while the ID Fan (induced draft) remained running. Power was restored and Boiler 4 was restarted at 2315.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Seventy (70) rail cars arrived at Covanta on 09/13/20 at 1930. The last twenty-two (22) rail cars were unloaded by 1930 on 09/16/20 due to the RTIF not being staffed when the containers were delivered. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped September 14, Covanta submitted a Covanta Niagara August Sanitary DMR.
- By email time stamped September 18, Covanta submitted a Covanta Niagara SW Permit Redline that included a supplemental attachment.
- By email time stamped September 22, Covanta submitted a Covanta Niagara Title V Addendum Submittal.



# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-21)

October 16, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: September 27, 2020 – October 10, 2020  
Dates Present at Site: October 02, 05 & October 07.  
Facility Monitor: Anthony Poupalos, E.I.T.

### Areas of Concern:

On 09/20/20 at 1931, DBA Boiler 3 was brought down for its scheduled maintenance outage and came back online on 10/06/20 at 0029. Waste was on the tipping floor on 09/29/20 at 1000 due to DBA 3 being down for its maintenance outage and was off the floor on 10/03/20 at 1345. DBA 3 was brought down for additional extractor repairs and came back online on 10/10/20 at 1450. The Contingency Plan was activated, and a Level C was called on 09/29/20 at 0815 after the ram feeder control failed on DBA Boiler 4 resulting in the boiler to have positive pressure. A Level B was called at 0824 when a small fire occurred at the expansion joint that was extinguished by plant personnel. The Level B was downgraded at 0850 with the Level C being called off at 0936. Waste was on the tipping floor on 10/05/20 at 1000 with waste coming off the tipping floor on 10/10/20 at 0754 due to the maintenance outage and an imbalance between incoming and processed waste volumes. For additional information, see section 10 below.

### Areas of Progress:

Additional personnel, contractors and equipment were on site for the scheduled boiler outage, which concluded on 10/06/20.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. On 09/20/20 at 1931, DBA Boiler 3 was brought down for its scheduled maintenance outage and came back online on 10/06/20 at 0029. Waste was on the tipping floor on 09/29/20 at 1000 due to DBA 3 being down for its maintenance outage and was off the floor on 10/03/20 at 1345. DBA 3 was brought down for additional extractor repairs and came back online on 10/10/20 at 1450. The Contingency Plan was activated, and a Level C was called on 09/29/20 at 0815 after the ram feeder control failed on DBA Boiler 4 resulting in the boiler to have positive pressure. A Level B was called at 0824 when a small fire occurred at the expansion joint that was extinguished by plant personnel. The Level B was downgraded at 0850 with the Level C being called off at 0936. Waste was on the tipping floor on 10/05/20 at 1000 with waste coming off the tipping floor on 10/10/20 at 0754 due to the maintenance outage and an imbalance between incoming and processed waste volumes. Additional personnel, contractors and equipment were on site for the scheduled boiler outage, which concluded on 10/06/20. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the September 27 to October 10, 2020 period:

<b>Bi-Weekly Period:</b>		<b>September 27 - October 10</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		21,618	Tons
RTIF MSW Received		14,121	Tons
MSW Received (Average)		1,802	Tons/Day
MSW+NHIW+TMW Consumed (Total)		19,665	Tons
MSW+NHIW+TMW Consumed (Average)		1,405	Tons/Day
NHIW Received (Total)		3,897	Tons
NHIW Received (Average)		325	Tons/Day
Treated Medical Waste Received (Total)		0	Tons
Treated Medical Waste Received (Average)		0	Tons/Day
Ash Residue MSW (Total)		3,670	Tons
Ash Residue MSW (Average)		262	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	35,712	279	57
#2*	0	0	336
#3*	12,399	48	288
#4*	100,736	335	1
#5*	43,446	336	0
<b>Total Steam Generation (Klbs)</b>			<b>192,294</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

4. Excursion Occurrences

- None were observed or reported during this period.

5. Spills/Cleanup

- Spill #2005694: On 10/01/20 at 0027, 1-gallon of diesel fuel was spilled on to the pavement. No sensitive receptors were affected, and the spill was cleaned up.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (Days)	Remarks
15	9/29/20 10:00 AM	10/3/20 1:45 PM	4.18	Waste was on the tipping floor on 09/29/20 at 1000 due to DBA 3 being down for its maintenance outage and was off the floor on 10/03/20 at 1345. DBA 3 was brought down for additional extractor repairs and came back online on 10/10/20 at 1450
15	10/5/20 10:00 AM	10/10/20 7:54 AM	4.91	Waste was on the tipping floor on 10/05/20 at 1000 with waste coming off the tipping floor on 10/10/20 at 0754 due to the maintenance outage and an imbalance between incoming and processed waste volumes

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated October 05, DEC approval of Covanta Niagara's September 30 request for disposal of non-hazardous waste (office clean-out: removal of documents [paper] & office furniture [desks, chairs & etc.]) from application 20-087.
- By letter dated October 02, DEC approval of Covanta Niagara's October 05 request for disposal of non-hazardous waste (waste that is generated throughout the building: packaging waste [cardboard, paper, plastic, wood] & general desk/cafeteria waste) from application 20-088.
- By letter dated September 23, DEC approval of Covanta Niagara's October 07 request for disposal of non-hazardous waste (storm water run-off from salt storage pads from salt mining industry: water, chloride & sodium, residual metals, trace cyanide, oil/grease & methylene blue active substance) from application 20-089.

## 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
10/6/2020	NOx	1	24.9	10/6/2020	735	10/6/2020	828	Further information will be provided in the quarterly reports.	Intermittent
10/6/2020	CO	1	24.9	10/6/2020	730	10/6/2020	828	Further information will be provided in the quarterly reports.	Intermittent
10/8/2020	NOx	1	24.8	10/8/2020	735	10/8/2020	825	Further information will be provided in the quarterly reports.	Intermittent

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

## 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

## 10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047 RTIF RAD Detector</b>	<b>Serial 1505LFM048 Inbound RAD Detector</b>	<b>Serial 1505LFM049 Outbound RAD Detector</b>
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047 RTIF RAD Detector</b>	<b>Serial 1505LFM048 Inbound RAD Detector</b>	<b>Serial 1505LFM049 Outbound RAD Detector</b>
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - The Contingency Plan was activated, and a Level C was called on 09/29/20 at 0815 after the ram feeder control failed on DBA Boiler 4 resulting in the boiler to have positive pressure. A Level B was called at 0824 when a small fire occurred at the expansion joint, which was extinguished by plant personnel. The expansion joint was covered, and the ram feeder control was repaired during that time. The Level B was downgraded at 0850 with the Level C being called off at 0936. Due to DBA Boiler 3 undergoing its scheduled maintenance outage, the Level B was called to alert the additional contractors onsite to vacate the DBA building so personnel could resolve the issue. The Fire Department was not called, and DBA 4 went back to operating as normal without further incident.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.

- All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - No issues were observed or reported during this period.

## 12. Reports and Other Correspondence

- By email time stamped September 30, Covanta submitted a Covanta Niagara Sodium Thiosulfate Update 03Q20.
- By email time stamped October 06, Covanta submitted a Covanta Niagara Total Loss of Ignition (TLI) Report.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-22)

November 02, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: October 11, 2020 – October 24, 2020  
Dates Present at Site: October 16, 19 & October 21.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

DBA Boiler 3 was offline for tube repairs on 10/14/20 at 1816 and came back online on 10/15/20 at 1851. Waste was on the tipping floor on 10/14/20 at 1400, in response to Boiler 3 being offline for repairs. Waste was off the tipping floor on 10/17/20 at 0230. DBA 3 was brought down on 10/23/20 at 2238 for tube repairs. The Contingency Plan was activated, and a Level C condition was called on 10/25/20 at 0345 in response to a tube failure on Boiler 3 during its hydrostatic test. The condition was lifted at 0400. The tube was repaired, and the boiler came back online on 10/26/20 at 0112. For additional information, see section 10 below.

### Areas of Progress:

Additional equipment is on site for the DBA Boiler 4 maintenance outage, which was scheduled to begin on 11/01/20.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

1. Plant Activity Summaries

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. DBA Boiler 3 was offline for tube repairs on 10/14/20 at 1816 and came back online on 10/15/20 at 1851. Waste was on the tipping floor on 10/14/20 at 1400, in response to Boiler 3 being offline for repairs. Waste was off the tipping floor on 10/17/20 at 0230. DBA 3 was brought down on 10/23/20 at 2238 for tube repairs. The Contingency Plan was activated, and a Level C condition was called on 10/25/20 at 0345 in response to a tube failure on Boiler 3 during its hydrostatic test. The condition was lifted at 0400. The tube was repaired, and the boiler came back online on 10/26/20 at 0112. The Department was notified of the extra time required to unload the RTIF Containers that arrived on 10/22/20 as per Condition 16 of the Solid Waste Permit. Additional equipment is on site for the DBA Boiler 4 maintenance outage, which was scheduled to begin on 11/01/20. For additional information, see section 10 below.

2. Plant Operation Summary

- Below is the plant operation data for the October 11 to October 24, 2020 period:

<b>Bi-Weekly Period:</b>		<b>October 11 - October 24</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		27,842	Tons
RTIF MSW Received		16,175	Tons
MSW Received (Average)		2,320	Tons/Day
MSW+NHIW+TMW Consumed (Total)		30,510	Tons
MSW+NHIW+TMW Consumed (Average)		2,179	Tons/Day
NHIW Received (Total)		6,311	Tons
NHIW Received (Average)		526	Tons/Day
Treated Medical Waste Received (Total)		829	Tons
Treated Medical Waste Received (Average)		69	Tons/Day
Ash Residue MSW (Total)		6,361	Tons
Ash Residue MSW (Average)		454	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	35,712	279	57
#2*	0	0	336
#3*	86,042	286	50
#4*	99,480	336	0
#5*	17,588	217	119
<b>Total Steam Generation (Klbs)</b>			<b>238,823</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

4. Excursion Occurrences

- None were observed or reported during this period.

5. Spills/Cleanup

- Spill #2006342: On 10/12/20 at 0850, 1-cup of hydraulic fluid spilled on to the pavement after a hose failed on a piece of equipment. No sensitive receptors were affected, and the spill was cleaned up.
- Spill #2006496: On 10/15 at 0744, 20-gallons of hydraulic oil spilled on to the tipping floor when a hydraulic hose from a waste truck failed. No sensitive receptors were affected, and the spill was cleaned up.

6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (Days)	Remarks
15	10/14/20 2:00 PM	10/17/20 2:30 AM	2.52	Waste was on the tipping floor on 10/14/20 at 1400, in response to Boiler 3 being offline for repairs. Waste was off the tipping floor on 10/17/20 at 0230

7. Non-Hazardous Industrial Waste (NHIW)

- By letter dated October 13, DEC approval of Covanta Niagara's September 30 request for disposal of non-hazardous waste (shredded wind turbine blades: fiberglass, carbon fiber & polyester/epoxy resin) from application 20-090.
- By letter dated October 07, DEC approval of Covanta Niagara's September 30 request for disposal of non-hazardous waste (documents created from regular clerical office activities: paper & plastic totes) from application 20-091.
- By letter dated October 14, DEC approval of Covanta Niagara's October 14 request for disposal of non-hazardous waste (off-spec/outdated/expired flavorings, additives & dyes from manufacturing: grilled sirloin & roasted chicken flavor) from application 20-092.

- By letter dated October 16, DEC approval of Covanta Niagara's October 15 request for disposal of non-hazardous waste (drugs & evidence) from application 20-093.
- By letter dated October 22, DEC approval of Covanta Niagara's October 20 request for disposal of non-hazardous waste (law enforcement agency collecting residential pharmaceutical waste from community) from application 20-094.
- By letter dated October 22, DEC approval of Covanta Niagara's October 21 request for disposal of non-hazardous waste (non-haz aqueous inks/cleaning solutions from toner r&d activities & site spill cleanups) from application 20-095.
- By letter dated October 23, DEC approval of Covanta Niagara's October 22 request for disposal of non-hazardous waste (household waste collection day: latex/enamel based paint, empty containers, non-haz cleaners & non-haz stains/glues/ adhesives) from application 20-096.

## 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
10/14/2020	CO, O2	1	4.9	10/14/2020	1223	10/14/2020	1238	Further information will be provided in the quarterly reports.	Yes
10/16/2020	NOx	1	21.5	10/16/2020	730	10/16/2020	1108	Further information will be provided in the quarterly reports.	Yes

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

## 9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
10/21/2020	O2 Wet	5	23.4	10/21/2020	630	10/21/2020	804	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - The Contingency Plan was activated and a Level C condition was called on 10/25/20 at 0345 in response to a tube failure on Boiler 3 during its hydrostatic test. The condition was lifted at 0400. The tube was repaired and the boiler came back online on 10/26/20 at 0112. A hydrostatic test is one of the checks performed on a boiler prior to it being allowed to come back online.

## 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: Forty-two (42) rail cars arrived at Covanta at 1200 on 10/22/20. The last fifteen (15) rail cars were unloaded by 1500 on 10/25/20 due to re-paving the tipping floor resulting in reduced vehicle traffic. The Department was notified of the extra time required to unload the RTIF Containers.

## 12. Reports and Other Correspondence

- By email time stamped October 14, Covanta submitted a Covanta Niagara September 2020 Sanitary DMR.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-23)

November 20, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: October 25, 2020 – November 07, 2020  
Dates Present at Site: October 30, & November 02, 04.  
Facility Monitor: Anthony Poupalos, E.I.T.



### Areas of Concern:

Due to DBA Boiler 3 being offline for tube repairs from 10/23/20 until 10/26/20, waste was on the tipping floor on 10/28/20 at 1120 and was off the floor on 10/30/20 at 0430. On 10/30/20 DBA Boiler 4 experienced a pressure reduction station malfunction at approximately 1543, which resulted in the boiler tripping offline from a low steam drum level. When the boiler tripped, the primary and secondary fans shut off resulting in smoldering on the roller grates until the boiler was restarted. By 1717, DBA 4 was operating within permit limits. Waste was on the tipping floor on 11/04/20 at 0445 and was off the floor on 11/07/20 at 0600 due to DBA 4 being offline for its maintenance outage. For additional information, see section 10 below.

### Areas of Progress:

Boiler 4 was brought down on 11/01/20 for its scheduled maintenance outage. Additional equipment, contractors and personnel are on site for the boiler outage.

The objective of this bi-weekly report is to summarize the observations made by the On-Site DEC Engineer on the day to day operations of the facility in view of all NYSDEC rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

**1. Plant Activity Summaries**

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Due to DBA Boiler 3 being offline for tube repairs from 10/23/20 until 10/26/20, waste was on the tipping floor on 10/28/20 at 1120 and was off the floor on 10/30/20 at 0430. On 10/30/20 DBA Boiler 4 experienced a pressure reduction station malfunction at approximately 1543, which resulted in the boiler tripping offline from a low steam drum level. When the boiler tripped, the primary and secondary fans shut off resulting in smoldering on the roller grates until the boiler was restarted. By 1717, DBA 4 was operating within permit limits. Waste was on the tipping floor on 11/04/20 at 0445 and was off the floor on 11/07/20 at 0600 due to DBA 4 being offline for its maintenance outage. Boiler 4 was brought down on 11/01/20 for its scheduled maintenance outage. Additional equipment, contractors and personnel are on site for the boiler outage. For additional information, see section 10 below.

**Plant Operation Summary**

- Below is the plant operation data for the October 25 to November 07, 2020 period:

<b>Bi-Weekly Period:</b>		<b>October 25 - November 07</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		25,948	Tons
RTIF MSW Received		15,043	Tons
MSW Received (Average)		2,162	Tons/Day
MSW+NHIW+TMW Consumed (Total)		24,447	Tons
MSW+NHIW+TMW Consumed (Average)		1,746	Tons/Day
NHIW Received (Total)		6,208	Tons
NHIW Received (Average)		517	Tons/Day
Treated Medical Waste Received (Total)		675	Tons
Treated Medical Waste Received (Average)		56	Tons/Day
Ash Residue MSW (Total)		5,196	Tons
Ash Residue MSW (Average)		371	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	25,580	174	162
#2*	0	0	336
#3*	94,636	310	26
#4*	52,815	188	148
#5*	34,253	314	22
<b>Total Steam Generation (Klbs)</b>			<b>207,284</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

2. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.
  - None were observed or reported during this period.

3. Excursion Occurrences

- None were observed or reported during this period.

Cond. #	Parameter	Boiler	Date	Time (hrs)	Permit Value	Excursion Value	# of Occurrences	Covanta Remarks
65.0	Carbon Monoxide (CO): carbon monoxide emission limit for mass burn waterwall municipal waste combustor	4	10/30/20	1:57	100 ppm	159 ppm (1200 – 1559) 1266 ppm (1600 – 1959)	2 (4 hour block)	On 10/30/20, Boiler 4 experienced exceedances of 159 ppm (1200 – 1559) and 1,266 ppm (1800 – 1959) for the carbon monoxide blocks excess emission. At approximately 1543hrs, a valve that controls the 1,200# to 180# steam pressure reduction station malfunctioned. When that happened, the steam that was going from the boiler to the turbine/generator was redirected to the atmosphere. This resulted in Boiler 4 tripping from a low steam drum level. When the boiler tripped, the primary and secondary air fans shut off and the material on the grates was smoldering until the boiler was restarted. By 1717hrs, the 1-minute CO readings were below the permit limit. The malfunctioning valve is currently being evaluated for repair by a contractor.

4. Spills/Cleanup

- None were observed or reported.

5. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (Days)	Remarks
15	10/28/20 11:20 AM	10/30/20 4:30 AM	1.72	Due to DBA Boiler 3 being offline for tube repairs from 10/23/20 until 10/26/20 waste was on the tipping floor on 10/28/20 at 11:20 and was off the floor on 10/30/20 at 0430.
15	11/4/20 4:45 AM	11/7/20 6:00 AM	2.05	Waste was on the tipping floor on 11/04/20 at 0445 and was off the floor on 11/07/20 at 0600 due to DBA 4 being offline for its maintenance outage

## 6. Non-Hazardous Industrial Waste (NHIW)

- By letter dated October 29, DEC approval of Covanta Niagara's October 28 request for disposal of non-hazardous waste (reject/spent toner cartridges from the manufacturing process) from application 20-097.
- By letter dated November 02, DEC approval of Covanta Niagara's November 02 request for disposal of non-hazardous waste (discarding of liquid/solid consumer care products & raw materials: shampoos, conditioners, tooth paste, mineral oil, silicones, lubricants, plastic tubes, bottles & cardboard) from application 20-098.
- By letter dated November 04, DEC approval of Covanta Niagara's November 02 request for disposal of non-hazardous waste (cleanout of water softener tank [filtration of city water] used in making pharmaceuticals: solid debris [resin beads], sediment, & quartz stone) from application 20-099.
- By letter dated November 05, DEC approval of Covanta Niagara's November 02 request for disposal of non-hazardous waste (seized properties from persons under correctional supervision: paper, plastic containers, metal objects & weapons) from application 20-100.

## 7. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

## 8. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

9. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - Nothing was observed or reported.

10. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.

- All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the Department.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - Nothing to report.

#### 11. Reports and Other Correspondence

- By email time stamped October 29, Covanta submitted a Covanta Niagara 3Q20 Excess Emission Report.
- By email time stamped October 29, Covanta submitted a Covanta Niagara 3Q20 Fuel Summary Report.
- By email time stamped October 29, Covanta submitted a Covanta Niagara 3Q20 Solid Waste Report.
- By email time stamped November 05, Covanta submitted a Covanta Niagara October Sanitary DMR.
- By email time stamped November 05, Covanta submitted a Covanta Niagara 3Q20 Solid Waste Report Rev 1.
- By email time stamped November 05, Covanta submitted a Covanta Niagara 3Q20 Excess Emission Report Rev 1.
- By email time stamped November 05, Covanta submitted a Covanta Niagara 3Q20 Fuel Summary Report Rev 1.

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources, Region 9  
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## Bi - Weekly Monitoring Report (Bi-Weekly: 2020-24)

December 01, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: November 08, 2020 – November 21, 2020  
Dates Present at Site: November 12, 16, 18, & November 20.  
Facility Monitor: Anthony Poupalos, E.I.T. 

### Areas of Concern:

Due to DBA Boiler 4 being down for its scheduled maintenance outage, waste was on the tipping floor on 11/10/20 at 1150. Waste was off the floor on 11/14/20 at 0737. DBA Boiler 3 was offline on 11/16/20 at 0602 for Induce Draft (ID) Fan balancing, and came back online on 11/16/20 at 2014. Waste was on the tipping floor on 11/16/20 at 1011, due to DBA 3's ID Fan balancing, and was off the floor on 11/20/20 at 0858. For additional information, see section 10 below.

### Areas of Progress:

Boiler 4 was brought down on 11/01/20 for its scheduled maintenance outage. DBA 4 came back online on 11/14/20 at 2139. Additional equipment, contractors and personnel were on site for post outage equipment/material removal.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site Department of Conservation (DEC) Engineer on the day to day operations of the facility in view of all New York State Department of Environmental Conservation (NYSDEC) rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

## **Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

### **1. Plant Activity Summaries**

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Due to DBA Boiler 4 being down for its scheduled maintenance outage, waste was on the tipping floor on 11/10/20 at 1150. Waste was off the floor on 11/14/20 at 0737. DBA Boiler 3 was offline on 11/16/20 at 0602 for Induce Draft (ID) Fan balancing, and came back online on 11/16/20 at 2014. Waste was on the tipping floor on 11/16/20 at 1011, due to DBA 3's ID Fan balancing, and was off the floor on 11/20/20 at 0858. The DEC was notified of the extra time required to unload the RTIF Containers that arrived on 11/10/20 and 11/15/20 as per Condition 16 of the Solid Waste Permit. Boiler 4 was brought down on 11/01/20 for its scheduled maintenance outage. DBA 4 came back online on 11/14/20 at 2139. Additional equipment, contractors and personnel were on site for post outage equipment/material removal. For additional information, see section 10 below.

### **Plant Operation Summary**

- Below is the plant operation data for the November 08 to November 21, 2020 period:

<b>Bi-Weekly Period:</b>		<b>November 08 - November 21</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		24,097	Tons
RTIF MSW Received		14,368	Tons
MSW Received (Average)		2,008	Tons/Day
MSW+NHIW+TMW Consumed (Total)		27,504	Tons
MSW+NHIW+TMW Consumed (Average)		1,965	Tons/Day
NHIW Received (Total)		5,437	Tons
NHIW Received (Average)		453	Tons/Day
Treated Medical Waste Received (Total)		379	Tons
Treated Medical Waste Received (Average)		32	Tons/Day
Ash Residue MSW (Total)		4,525	Tons
Ash Residue MSW (Average)		323	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	25,568	203	133
#2*	0	0	336
#3*	98,425	322	14
#4*	51,778	171	165
#5*	22,263	263	73
<b>Total Steam Generation (Klbs)</b>			<b>198,034</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

2. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
11/14/2020	Opacity	4	22.3	11/14/2020	447	11/14/2020	518	Further information will be provided in the quarterly reports.	Intermittent
11/20/2020	Opacity	4	26.3	11/20/2020	700	11/20/2020	707	Further information will be provided in the quarterly reports.	Yes

3. Excursion Occurrences

- None were observed or reported during this period.

4. Spills/Cleanup

- Spill #2007169: On 11/09/20 at 1351, approximately 1.5 gallons of diesel oil was spilled on to the pavement due to a hose failure. The spill was cleaned up and no sensitive receptors were affected.

5. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.

- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (Days)	Remarks
15	11/10/20 11:50 AM	11/14/20 7:37 AM	3.78	Due to DBA Boiler 4 being down for its scheduled maintenance outage, waste was on the tipping floor on 11/10/20 at 1150. Waste was off the floor on 11/14/20 at 0737
15	11/16/20 10:11 AM	11/20/20 8:58 AM	3.78	Waste was on the tipping floor on 11/16/20 at 1011, due to DBA 3's Induced Draft (ID) Fan balancing, and was off the floor on 11/20/20 at 0858.

6. Non-Hazardous Industrial Waste (NHIW)

- By letter dated November 13, DEC approval of Covanta Niagara's November 02 request for disposal of non-hazardous waste (outdated/off-spec material: triton x-405 surfactant, s-400-n1 micronized ebs wax, & acrysol rm-8w rheology modifier) from application 20-101.
- By letter dated November 17, DEC approval of Covanta Niagara's November 13 request for disposal of non-hazardous waste (virgin product rejects from the making of feminine products: paper, plastics & cardboard) from application 20-102.

## 7. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
11/10/2020	NOx	1	24.9	11/10/2020	740	11/10/2020	831	Further information will be provided in the quarterly reports.	Yes
11/12/2020	NOx	1	27.6	11/12/2020	740	11/12/2020	1113	Further information will be provided in the quarterly reports.	Intermittent
11/17/2020	NOx	1	24.1	11/17/2020	730	11/17/2020	1019	Further information will be provided in the quarterly reports.	No

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

## 8. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
11/11/2020	O2 Wet	5	24.6	11/11/2020	630	11/11/2020	718	Further information will be provided in the quarterly reports.	Intermittent

- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

## 9. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- **Brownfield Cleanup Project (BCP) Remediation**
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- **Monitoring Well No. 17 Issues**
  - Nothing to report.
- **Stormwater Management**
  - Nothing to report.
- **Incidents, Emergencies & Long-Term Repairs.**
  - Nothing was observed or reported.

#### 10. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by the DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.

- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the DEC.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: sixty-two (62) rail cars arrived at Covanta at 1300 on 11/10/20. The last eight (8) rail cars were unloaded by 1300 on 11/13/20 due adjusted unloading times during the Boiler 4 maintenance outage. The DEC was notified of the extra time required to unload the RTIF Containers.
  - RTIF Containers: seventy-two (72) rail cars arrived at Covanta at 2130 on 11/15/20. The last twelve (12) rail cars were unloaded by 2130 on 11/18/20 due to railcars being received when the RTIF was not staffed. The DEC was notified of the extra time required to unload the RTIF Containers.

#### 11. Reports and Other Correspondence

- By email time stamped November 11, Covanta submitted a Covanta Niagara Updated Facility Contacts List.

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-25)

December 15, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: November 22, 2020 – December 05, 2020  
Dates Present at Site: November 25, & December 02.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:**

Waste was on the tipping floor on 11/25/20 at 2000 due to ash extractor repairs/malfunctions and was off the floor on 11/28/20 at 0113. DBA Boiler 4 was offline for ash extractor repairs on 11/26/20 at 1435 and came back online on 11/28/20 at 1326. Waste was on the tipping floor on 12/01/20 at 2051 and was off the floor on 12/06/20 at 0910 in response to DBA 4 being down for extractor repairs. On 12/02/20 at 2248 DBA 3 was offline due to a clogged ash extractor. The extractor clog was cleared and DBA 3 came back online at 12/03/20 at 2217. For additional information, see section 10 below.

**Areas of Progress:**

Additional equipment is still on site for post outage equipment/material removal.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site Department of Conservation (DEC) Engineer on the day to day operations of the facility in view of all New York State Department of Environmental Conservation (NYSDEC) rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

**1. Plant Activity Summaries**

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Waste was on the tipping floor on 11/25/20 at 2000 due to ash extractor repairs/malfunctions and was off the floor on 11/28/20 at 0113. DBA Boiler 4 was offline for ash extractor repairs on 11/26/20 at 1435 and came back online on 11/28/20 at 1326. Waste was on the tipping floor on 12/01/20 at 2051 and was off the floor on 12/06/20 at 0910 in response to DBA 4 being down for extractor repairs. On 12/02/20 at 2248 DBA 3 was offline due to a clogged ash extractor. The extractor clog was cleared and DBA 3 came back online at 12/03/20 at 2217. The DEC was notified of the extra time required to unload the RTIF Containers that arrived on 11/22/20, 11/24/20 and 12/02/20 as per Condition 16 of the Solid Waste Permit. Additional equipment is still on site for post outage equipment/material removal. For additional information, see section 10 below.

**Plant Operation Summary**

- Below is the plant operation data for the November 22 to December 05, 2020 period:

<b>Bi-Weekly Period:</b>		<b>November 22 - December 05</b>	
<b>Items</b>		<b>Quantity</b>	<b>Units</b>
MSW Received (Includes RTIF)		32,389	Tons
RTIF MSW Received		18,646	Tons
MSW Received (Average)		2,699	Tons/Day
MSW+NHIW+TMW Consumed (Total)		27,834	Tons
MSW+NHIW+TMW Consumed (Average)		1,988	Tons/Day
NHIW Received (Total)		6,596	Tons
NHIW Received (Average)		550	Tons/Day
Treated Medical Waste Received (Total)		626	Tons
Treated Medical Waste Received (Average)		52	Tons/Day
Ash Residue MSW (Total)		5,561	Tons
Ash Residue MSW (Average)		397	Tons/Day
<b>Boiler</b>	<b>Steam (Klbs)</b>	<b>Time Online (Hrs)</b>	<b>Time Down (Hrs)</b>
#1*	10,029	72	264
#2*	0	0	336
#3*	93,801	313	23
#4*	86,521	290	46
#5*	22,398	282	54
<b>Total Steam Generation (Klbs)</b>			<b>212,749</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

## 2. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
12/1/2020	O2	3	24.8	12/1/2020	600	12/1/2020	705	Further information will be provided in the quarterly reports.	Yes
12/1/2020	NOx	3/4	24.8	12/1/2020	600	12/1/2020	656	Further information will be provided in the quarterly reports.	Yes
12/1/2020	SO2	4	24.8	12/1/2020	600	12/1/2020	701	Further information will be provided in the quarterly reports.	Yes
12/3/2020	O2	3	24.8	12/3/2020	600	12/3/2020	707	Further information will be provided in the quarterly reports.	Intermittent
12/3/2020	NOx	4	24.8	12/3/2020	600	12/3/2020	657	Further information will be provided in the quarterly reports.	Yes
12/3/2020	O2	4	24.8	12/3/2020	600	12/3/2020	707	Further information will be provided in the quarterly reports.	Yes
12/3/2020	CO2	4	24.8	12/3/2020	600	12/3/2020	707	Further information will be provided in the quarterly reports.	Yes

## 3. Excursion Occurrences

- None were observed or reported during this period.

## 4. Spills/Cleanup

- None were observed or reported during this period.

## 5. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (Days)	Remarks
15	11/25/20 8:00 PM	11/28/20 1:13 AM	2.28	Waste was on the tipping floor on 11/25/20 at 2000 due to ash extractor repairs/malfunctions and was off the floor on 11/28/20 at 0113.
15	12/1/20 8:51 PM	12/6/20 9:10 AM	4.57	Waste on the tipping floor on 12/01/20 at 2051 and was off the floor on 12/06/20 at 0910 in response to DBA 4 being down extractor repairs.

6. Non-Hazardous Industrial Waste (NHIW)

- By letter dated December 02, DEC approval of Covanta Niagara's November 20 request for disposal of non-hazardous waste (raw material waste: phenolic thermoplastic resin, zinc oxide, phenolic resin & stearic acid) from application 20-103.
- By letter dated December 03, DEC approval of Covanta Niagara's December 02 request for disposal of non-hazardous waste (material mixed through a dust control system associated with blends production: sylobloc 45b) from application 20-104.

7. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
11/24/2020	O2	1	30.2	11/24/2020	730	11/24/2020	1359	Further information will be provided in the quarterly reports.	No
11/27/2020	NOx	1	26.2	11/27/2020	730	11/27/2020	954	Further information will be provided in the quarterly reports.	Yes
11/28/2020	NOx	1	5.0	11/28/2020	1211	11/28/2020	1241	Further information will be provided in the quarterly reports.	Intermittent
12/3/2020	NOx	1	23.6	12/3/2020	740	12/3/2020	1014	Further information will be provided in the quarterly reports.	Intermittent

- EFW Operating Summary
  - EFW 1 Boiler was online during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

8. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

9. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- None were observed or reported.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.
- Incidents, Emergencies & Long-Term Repairs.
  - Nothing was observed or reported.

10. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by the DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.

- All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.
  - All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the DEC.
  - The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - RTIF Containers: seventy-three (73) rail cars arrived at Covanta at 2300 on 11/22/20. The last nineteen (19) rail cars were unloaded by 1100 on 11/25/20 due to railcars being received when the RTIF was not staffed. The DEC was notified of the extra time required to unload the RTIF Containers.
  - RTIF Containers: thirty (30) rail cars arrived at Covanta at 1330 on 11/24/20. The last twelve (12) rail cars were unloaded by 0000 on 11/27/20 due to reduced refuse feed rates to the DBA Boilers while DBA 4 was down for extractor repairs. The DEC was notified of the extra time required to unload the RTIF Containers.
  - RTIF Containers: twenty-four (24) rail cars arrived at Covanta at 1230 on 12/02/20. The last ten (10) rail cars were unloaded by 1930 on 12/04/20 due to reduced refuse feed rates while DBA Boiler 3 was offline from 12/02/20 to 12/03/20. The DEC was notified of the extra time required to unload the RTIF Containers.

#### 11. Reports and Other Correspondence

- By email time stamped November 23, Covanta submitted a Covanta Niagara 4th Quarter Sanitary DMR.

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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**Bi - Weekly Monitoring Report**  
(Bi-Weekly: 2020-26)

December 30, 2020

Distribution: Mr. Michael Emery – RAPCE, Region 9  
Ms. Donna Kiersz – DAR, Region 9  
Mr. Peter Grasso – RMME, Region 9  
Ms. Jaime Lang – DMM, Albany  
Mr. Chris Schifferli – Covanta Niagara I, LLC  
Niagara County Health Department

Facility Name: Niagara Resource Recovery Facility: Covanta Niagara I, LLC  
Facility ID Number: 9-2911-00113 (DAR & DMM)  
Reporting Period: December 06, 2020 – December 19, 2020  
Dates Present at Site: December 09, 11, 14, 16, & December 18.  
Facility Monitor: Anthony Poupalos, E.I.T.



**Areas of Concern:**

Waste was on the tipping floor on 12/01/20 at 2051 and was off the floor on 12/06/20 at 0910 in response to DBA Boiler 4 being down for extractor repairs. On 12/08/20 Covanta notified the NYS Department of Environmental Conservation (NYS DEC) of a potential cooling tower water leak (confirmed on 12/22/20). At the time of notification, an estimated value of 20 gallons per minute was reported entering B-sump containment that is discharged under Covanta's SIU Permit No. 32 through MS#1 to the Niagara Falls Water Board. Waste was on the tipping floor on 12/08/20 at 1150 due to RITF delivery delays by CSX and was off the floor on 12/12/20 at 1800. On 12/15/20 at 1100, waste was on the tipping floor due to waste deliveries temporarily increasing in advance of waste delivery declines during the holidays. For additional information, see section 10 below.

**Areas of Progress:**

Nothing to report.



Department of  
Environmental  
Conservation

The objective of this bi-weekly report is to summarize the observations made by the On-Site Department of Conservation (DEC) Engineer on the day to day operations of the facility in view of all New York State Department of Environmental Conservation (NYSDEC) rules, regulations, and permit conditions. This report also outlines other permitting and reporting activities associated with waste fuel receipts for process or incineration.

**Boiler Operations & Rail-to-Intermodal Facility (RTIF):**

**1. Plant Activity Summaries**

The plant is performing its normal operations and maintenance practices. Cleaning is continuing daily around plant systems. Waste by rail (RTIF) is continuing to arrive at the facility. Waste was on the tipping floor on 12/01/20 at 2051 and was off the floor on 12/06/20 at 0910 in response to DBA Boiler 4 being down for extractor repairs. On 12/08/20 Covanta notified the NYS Department of Environmental Conservation (NYS DEC) of a potential cooling tower water leak (confirmed on 12/22/20). At the time of notification, an estimated value of 20 gallons per minute was reported entering B-sump containment that is discharged under Covanta's SIU Permit No. 32 through MS#1 to the Niagara Falls Water Board. Waste was on the tipping floor on 12/08/20 at 1150 due to RTIF delivery delays by CSX and was off the floor on 12/12/20 at 1800. On 12/15/20 at 1100, waste was on the tipping floor due to waste deliveries temporarily increasing in advance of waste delivery declines during the holidays. For additional information, see section 10 below.

**2. Plant Operation Summary**

- Below is the plant operation data for the December 06 to December 19, 2020 period:

<b>Bi-Weekly Period:</b>		<b>December 06 - December 19</b>	
<i>Items</i>		<i>Quantity</i>	<i>Units</i>
MSW Received (Includes RTIF)		31,387	Tons
RTIF MSW Received		18,339	Tons
MSW Received (Average)		2,616	Tons/Day
MSW+NHIW+TMW Consumed (Total)		33,843	Tons
MSW+NHIW+TMW Consumed (Average)		2,417	Tons/Day
NHIW Received (Total)		6,655	Tons
NHIW Received (Average)		555	Tons/Day
Treated Medical Waste Received (Total)		661	Tons
Treated Medical Waste Received (Average)		55	Tons/Day
Ash Residue MSW (Total)		6,208	Tons
Ash Residue MSW (Average)		443	Tons/Day
<i>Boiler</i>	<i>Steam (Klbs)</i>	<i>Time Online (Hrs)</i>	<i>Time Down (Hrs)</i>
#1*	0	0	336
#2*	0	0	336
#3*	102,827	336	0
#4*	102,914	336	0
#5*	18,294	262	74
<b>Total Steam Generation (Klbs)</b>			<b>224,035</b>

\*Individual Steam Values are an Approximation based on CEMS 1-hour Averages.

### 3. DBA Boilers

- Out of Control (OOC) Data for Continuous Emission Monitoring System (CEMS)
  - During this time, emission data is invalid.

Date	Parameter	Boiler	Duration (Hours)	Calibration Failure		Correction Calibration		REASON	Boiler Online (Y/N or Intermittent)
				Date	Time	Date	Time		
12/6/2020	NOx	3	28.2	12/6/2020	600	12/6/2020	1024	Further information will be provided in the quarterly reports.	Yes
12/6/2020	O2	3	28.2	12/6/2020	600	12/6/2020	1034	Further information will be provided in the quarterly reports.	Yes
12/6/2020	O2E	3	27.4	12/6/2020	630	12/6/2020	1010	Further information will be provided in the quarterly reports.	Yes
12/6/2020	SO2E	3	27.4	12/6/2020	630	12/6/2020	1005	Further information will be provided in the quarterly reports.	Yes
12/6/2020	CO2	4	23.8	12/6/2020	600	12/6/2020	610	Further information will be provided in the quarterly reports.	Yes
12/6/2020	NOx	4	28.5	12/6/2020	600	12/6/2020	1041	Further information will be provided in the quarterly reports.	Yes
12/6/2020	O2	4	28.5	12/6/2020	600	12/6/2020	1051	Further information will be provided in the quarterly reports.	Yes
12/6/2020	O2S	4	28.5	12/6/2020	600	12/6/2020	1051	Further information will be provided in the quarterly reports.	Yes
12/6/2020	SO2E	4	27.5	12/6/2020	630	12/6/2020	1010	Further information will be provided in the quarterly reports.	Yes
12/10/2020	SO2E	3	24.6	12/10/2020	630	12/10/2020	715	Further information will be provided in the quarterly reports.	Yes
12/10/2020	O2E	3	24.6	12/10/2020	630	12/10/2020	720	Further information will be provided in the quarterly reports.	Yes
12/10/2020	SO2E	3	24.6	12/10/2020	630	12/10/2020	715	Further information will be provided in the quarterly reports.	Yes
12/10/2020	O2E	4	24.5	12/10/2020	630	12/10/2020	715	Further information will be provided in the quarterly reports.	Yes
12/10/2020	SO2E	4	24.7	12/10/2020	630	12/10/2020	720	Further information will be provided in the quarterly reports.	Yes

### 4. Excursion Occurrences

- None were observed or reported during this period.

### 5. Spills/Cleanup

- Spill 2007901: On 12/07/20 at 1552, 5-gallons of hydraulic oil spilled onto the concrete pavement due to a failed hose. The spill was cleaned up and no sensitive receptors were affected.

## 6. Solid Waste Storage & Handling

- Observations made from the scale house, tipping hall floor, and the DBA bunker indicated that typical processed waste consisted of the following: household trashes, mattresses, plastic shrink wrap/rolls, cardboard/paper, grass, leaves, furniture, rugs, autoclaved medical wastes, pre-packaged pharmaceutical wastes, petroleum based products and empty or full metal/plastic 55-gallon drums. The items listed above are some of the more common waste streams processed at the plant.
- Refuse storage time on the tipping floor is listed below:

Cond. #	Begin Date/Time	End Date/Time	Total Time (Days)	Remarks
15	12/1/20 8:51 PM	12/6/20 9:10 AM	4.57	Waste on the tipping floor on 12/01/20 at 2051 and was off the floor on 12/06/20 at 0910 in response to DBA 4 being down extractor repairs
15	12/1/20 8:51 PM	12/6/20 9:10 AM	4.57	Waste was on the tipping floor on 12/08/20 at 1150 as a result of a delay of RTIF deliveries into the facility by CSX. Waste was off the tipping floor on 12/12/20 at 1800.
15	11/10/20 11:50 AM	11/14/20 7:37 AM	3.78	Waste was on the tipping floor on 12/15/20 at 1100 due to waste deliveries temporarily increasing in advance of waste delivery declines during the holidays. Waste was off the tipping floor on 12/19/20 at 0230.

## 7. Non-Hazardous Industrial Waste (NHIW)

- *Edit to Bi-Weekly 2020-25: By letter dated December 03, DEC disapproval of Covanta Niagara's December 02 request for disposal of non-hazardous waste (material mixed through a dust control system associated with blends production: sylobloc 45b) from application 20-104 DISAPP.*
- By letter dated December 09, DEC approval of Covanta Niagara's November 17 request for disposal of non-hazardous waste (off-spec/expired DEA controlled materials [schedule iv-v], tablets, powder blend, dust collectors, samples from xanax, lomitol, halcion, tafil, pregabalin, pseudoephedrine & ativan) from application 20-105.
- By letter dated December 09, DEC approval of Covanta Niagara's December 03 request for disposal of non-hazardous waste (onfiscated drugs & evidence/files) from application 20-106.
- By letter dated December 09, DEC approval of Covanta Niagara's December 03 request for disposal of non-hazardous waste (waste generated through the manufacturing process for injectable pharmaceuticals & expired material in bulk solution & vials: ephedrine sulfate, ketamine, lacosamide API, fentanyl/fentanyl citrate, hydromorphone HCL, morphine sulfate, remifentanyl hcl, midazolam API, & morphine remifentanyl filter flush) from application 20-107.
- By letter dated December 11, DEC approval of Covanta Niagara's December 09 request for disposal of non-hazardous waste (discontinued product/ancillary materials: packaging materials, teeth whitening pens [plastic pens, jacketed in aluminum] & whitening gel) from application 20-108.
- By letter dated December 11, DEC approval of Covanta Niagara's December 09 request for disposal of non-hazardous waste (spool waste from creating seatbelts: polyester wrapped in plastic film & cardboard) from application 20-109.

- By letter dated December 15, DEC approval of Covanta Niagara's December 14 request for disposal of non-hazardous waste (commercial/plant production waste: office/cafeteria waste, floor sweepings, empty beauty care containers, unrecyclable cardboard, paper/plastic packaging, wooden packaging materials, styrofoam, rope/twine, uncontaminated rubber/cloths & metal bindings) from application 20-110.
- By letter dated December 16, DEC approval of Covanta Niagara's December 14 request for disposal of non-hazardous waste (mixing, consolidating/solidifying non-haz waste materials & spill cleanup: earth/sand, latex adhesive/coatings, cured resins, detergents/soap, starches, water & saw dust) from application 20-111.
- By letter dated December 17, DEC approval of Covanta Niagara's December 08 request for disposal of non-hazardous waste (waste from wood cabinet manufacturing: general plant trash, dry stain rags/paint filters, saw dust, wood scrap & plastic liners packaging) from application 20-112.
- By letter dated December 18, DEC approval of Covanta Niagara's December 17 request for disposal of non-hazardous waste (general trash collection at facility: lunchroom waste, housekeeping/general trash [paper, cardboard, plastics] & packaging waste) from application 20-113.
- By letter dated December 18, DEC approval of Covanta Niagara's December 17 request for disposal of non-hazardous waste (plant trash from operations [excluding: machinery leakage & production spill cleanup]: paper products, ear plugs, rubber gloves, plastic, packaging pillows, cardboard, rags, pads, absorbents, virgin oil residue & wood pallets) from application 20-114.
- By letter dated December 18, DEC approval of Covanta Niagara's December 17 request for disposal of non-hazardous waste (residual water from phase separation process: water, emulsified oils, detergents, soaps & dissolved solids) from application 20-115.

#### 8. Energy from Waste (EFW) Boilers

- Out of Control Data for EFW CEMS Monitoring
  - None were observed or reported during this period.
- EFW Operating Summary
  - EFW 1 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
  - EFW 2 Boiler was offline during this period. Daily maintenance, calibrations and purge tests were performed for this period.
- AF Source Inspection
  - None were performed during this period.

9. B5 Low Pressure Steam Boiler

- Out of Control Data for Boiler 5 CEMS Monitoring
  - During this time, data substitution is used for invalid emission data.
  - None were observed or reported during this period.
- Boiler 5 Operating Summary
  - B5 is a low pressure, natural gas steam boiler. It uses low NOx burners to generate steam for customers. During this period, the boiler was online. Daily maintenance, calibrations and purge tests were performed for this period.

10. Miscellaneous

- RAD Spikes at Scale House and RTIF ("Action Level Exceedance")
  - *Covanta's Trigger Limit was updated on 09/28/15 as per the RTIF Part 360 Mod Permit effective on 02/17/15 (5X background). The fixed radiation detectors for the Scalehouse and RTIF sites were calibrated on 06/08/20. When detectors are triggered, trucks can be left in the designated "hot load" area in order for the levels to drop down before being rescanned and sent to the tipping floor for disposal or be turned away.*

<i>Radiation Detector Background Readings in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	5 cps	6 cps	5 cps
<b>Medium Energy (100 - 400 keV):</b>	12 cps	13 cps	12 cps
<b>High Energy (&gt;400 keV):</b>	6 cps	6 cps	4 cps
<i>5X Background Trigger Limit in Counts/Second (cps)</i>	<b>Serial 1505LFM047</b> RTIF RAD Detector	<b>Serial 1505LFM048</b> Inbound RAD Detector	<b>Serial 1505LFM049</b> Outbound RAD Detector
<b>Low Energy (20 - 99 keV):</b>	25 cps	30 cps	25 cps
<b>Medium Energy (100 - 400 keV):</b>	60 cps	65 cps	60 cps
<b>High Energy (&gt;400 keV):</b>	30 cps	30 cps	20 cps

- On 12/06/20 a Tonawanda Truck had a low energy radiation spike of 50 cps, which is above Covanta's trigger limit (5x background). The truck was left in the designated holding area until its levels drop below acceptable limits.
- Brownfield Cleanup Project (BCP) Remediation
  - The BCP site remediation was completed. For additional information please see LaBella Associates Monthly Progress Reports (MPR). A certificate of completion was issued by the DEC to Covanta Niagara I, LLC on 12/23/15.
- Monitoring Well No. 17 Issues
  - Nothing to report.
- Stormwater Management
  - Nothing to report.

- Incidents, Emergencies & Long-Term Repairs.
  - 12/08/20 Initial Notification: Covanta is in the process of identifying a possible steam turbine, subsurface, cooling water leak. An estimated 20 gallons per minute is entering our B-sump containment prior to being discharged under Covanta's SIU permit No. 32 through MS#1 to the Niagara Falls Water Board. A sample from the leak was collected on 12/7/20 and it identified the presence of phosphate, which is in our cooling water. Additional samples were collected on 12/08/20 and checked for Phosphorus, which showed cooling tower levels at 12.8 ppm and the leak to B-sump at 9.6 ppm.

Sanitary discharge to the NFWB through MS#1 = 0.53 ppm. For reference, the latest quarterly analytical sample collected on 11/6/20 was 0.51 ppm. The quarterly discharge permit limit is 9 lbs/day and at 0.51 ppm, Covanta's discharge was 1.995 lbs/day during the quarter. At 0.53 ppm instead of 0.51 ppm and at yesterday's discharge volume flow of 0.450 MGD, the Phosphorus loading would have been about 1.989 lbs/day yesterday.

Potable water phosphorus values entering the facility are 0.07 ppm. Stormwater phosphorus values leaving the facility are 0.13 ppm.

- 12/22/20 Update: Lab analytical confirmed that the leak to b-sump is from the steam turbine cooling water. Covanta is currently developing an action plan to address the problem.

#### 11. Rail-to-Truck Intermodal Facility Observations (RTIF)

- Covanta received their Part 360 RTIF Permit Modification, which was effective on 02/13/15. Covanta received NYSDEC approval to commence shakedown operations for the Rail-to-Intermodal Facility. On 09/28/15, the first train with containerized waste arrived on site for disposal at the facility. Please see the information below for any site updates and activities:
  - Covanta was given authorization by the DEC to commence full scale operation of the RTIF on 05/10/16.
    - Solid Waste Management Facility Operations & Maintenance Manual (O&MM) was last updated on December 30, 2019.
    - All documentation that was submitted for full scale operation of the RTIF was received and reviewed. Covanta Niagara I, LLC made necessary corrections and updates to the documents that were discovered upon review by the NYSDEC. Minor updates to the O&MM are ongoing.

- All RTIF Containers are scanned for radiation at the MTS location prior to being sent to Covanta Niagara by Rail. Each rail car holds up to four (4) containers. Before the RTIF Containers are sent to the tipping floor, they are weighed and scanned for radiation by fixed radiation detectors located at the RTIF Scale. In the event of a failure of the RTIF Scale Detectors that cannot be timely repaired or when a system alert notification occurs, RTIF Containers are sent through the Scalehouse Radiation Detector Portals before being sent up to the tipping floor. The facility's Solid Waste Permit requires RTIF Containers to be processed within 48 hours of arrival at the facility, with any potential deviations being notified to the DEC.
- The Sanitary Sewer Monitoring Station is online as of 12/30/15 operating in accordance with the NFWB permit.
- Waste by rail continues to arrive on site as the facility is in full scale operation. Site maintenance and operations continue to be performed as per the Solid Waste Permit and the Operations and Maintenance Manual guidelines.
  - No issues were observed or reported.

#### 12. Reports and Other Correspondence

- By email time stamped December 10, Covanta submitted a Covanta Niagara November 2020 Monthly Sanitary Report.
- By email time stamped December 17, Covanta submitted a notification of Tentative Schedule for Boiler Maintenance Outages, RATA/Stack Testing and Semi -Annual Ash Characterizations.



December 9, 2020

Reference No. 11212683

Mr. Chris Schifferli, P.E.  
Covanta Niagara I, LLC  
100 Energy Boulevard  
Niagara Falls, NY 14304

Dear Mr. Schifferli:

**Re: 6 NYCRR Part 360 Solid Waste Management Facility Inspection  
Covanta Niagara I, LLC, Niagara Falls, NY (Permit No. 9-2911-00113/00023)**

GHD is pleased to submit the following letter report to Covanta Niagara I, LLC (Covanta) discussing the results of the recent Part 360 Solid Waste Management Facility Inspection of the Covanta Plant located in Niagara Falls, New York (Facility or Site). The purpose of this review was to evaluate the compliance status of Covanta with its Part 360 Permit and to identify potential findings or outstanding issues that may exist, if any. As a change from prior years of conducting the annual audit, Mr. Steven Wilsey (GHD) and Mr. Bryan Szalda (GHD) conducted the review off-site due to the current COVID-19 pandemic. Mr. Chris Schifferli (Covanta) provided relevant Site records to GHD in electronic format via email.

This inspection was conducted in accordance with the Scope of Work, dated April 21, 2020.

## 6 NYCRR Part 360 Solid Waste Management Facility Inspection

The following records were provided to GHD in electronic PDF format unless otherwise indicated:

- 6 NYCRR Part 360 Solid Waste Permit, effective April 1, 2005 (with modifications incorporated on April 20, 2005, June 22, 2011 and February 13, 2015)
- Part 360 Permit SAPA Extension Letter, dated April 21, 2015
- Title V Permit SAPA Extension Letter, dated May 3, 2019
- Updated OM&M Manual, dated December 30, 2019
- 2019 Q3 Solid Waste Report, dated October 21, 2019
- 2019 Q3 Solid Waste Report, dated January 17, 2020
- 2020 Q1 Solid Waste Report, dated April 17, 2020
- 2020 Q2 Solid Waste Report, dated July 21, 2020
- 2019 Annual Operating Report, dated February 18, 2020
- Semiannual Ash Sampling Analysis, dated August 5, 2020



- Radiation Detection Forms for the period of January 31, 2020 through June 3, 2020 (17 total)
- Waste Rejection Forms (in Word format) for the period of March 20, 2019 through May 5, 2020 (10 total)

GHD has reviewed the facility records as documented in Attachment 1. GHD utilized the NYSDEC Solid Waste Management Facility Inspection Report form during performance of the audit. No issues related to the Part 360 Permit were identified during the evaluation of the records provided by Covanta.

GHD appreciates the opportunity to provide these services to Covanta. Should you have any questions, or require additional information or clarification, please do not hesitate to contact the undersigned.

Sincerely,

GHD

Steven D. Wilsey, CHMM

SDW/RS/cs/3

Encl.

Richard Snyder, P.E.



# Attachment 1 Inspection Form



**NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
DIVISION OF SOLID & HAZARDOUS MATERIALS  
6 NYCRR Part 360-3**

**SOLID WASTE MANAGEMENT FACILITY INSPECTION REPORT**

(For use at Solid Waste Incinerators or Refuse Derived Fuel Processing Facilities or Solid Waste Pyrolysis Units)

FACILITY NAME: <b>Covanta Niagara I, LLC</b>		LOCATION: <b>100 Energy Blvd, Niagara Falls, NY</b>		FACILITY ID#: <b>9-2911-00113</b>	DATE: <b>2020</b>	TIME: <b>----</b>
INSPECTOR'S NAME: <b>GHD (Wilsey / Szalda)</b>		CODE: <b>---</b>	PERSONS INTERVIEWED & TITLES <b>Chris Schifferli (Environmental Engineer)</b>			
REGION <b>9</b>	WEATHER CONDITIONS:		DEC PERMIT NUMBER <b>9-2911-00113/00023</b>			
SHEET <b>1</b>	OF <b>2</b>	CONTINUATION SHEET <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		PART(S) 360- <b>Attached</b>		

Violations of Part 360 are Subject to Applicable Civil, Administrative, and Criminal Sanctions Set Forth in ECL Article 71 and as Appropriate, the Clean Water and Air Acts. Additional and/or Multiple Violations May be Described on the Attached Continuation Sheet.

**This form is a record of conditions which are observed in the field at the time of inspection.  
Items marked NI indicate No Inspection and do not mean no violation has occurred.**

- PART 360 PERMIT     ORDER ON CONSENT     REGISTERED     EXEMPT     COMPLAINT
- C   NI   V

**FACILITY MANAGEMENT**

1. Solid waste management facility is authorized and management occurs within approved area. 360-1.5(a), 360-1.7(a) (1), (b)

***GHD Comment 1: Covanta is an authorized Part 360 Solid Waste Management Facility under NYSDEC Permit 9-2911-00113/00023. The original permit was effective on April 1, 2005. The Facility applied for and received NYSDEC approval for three permit modifications during the current permit term (effective on 4/20/2005, 6/22/2011 and 2/13/2015).***

2. Incoming waste is monitored by a control program for unauthorized waste and solid waste material accepted are approved for management at the facility

- a. Control Program. 360-1.14(e) (1), 360-3.4 (b) (1)  
b. Department Approved Facility for Specific Wastes. 360-1.14(r)  
c. Signs 360-3.4 (e)

***GHD Comment 2: The Facility's Operation and Maintenance Manual (OM&M), last updated in December 2019, addresses each of the items outlined above. Section 3 of the OM&M details the Waste Control Plan which requires that only refuse as established by the Solid Waste Facility Permit and acceptable to Covanta Niagara is received, processed and combusted at the Facility. In addition to language cited in Covanta Niagara's contracts to specifically prohibit the delivery of regulated hazardous waste at the facility, tipping hall operators have been trained to do random waste inspections of trucks delivering solid waste to the facility. The Facility submits quarterly and annual reports to NYSDEC as required in the permit. Section 3.3 of the OM&M lists the signs, which are visible for a distance of at least 25 feet that are posted at the Facility.***

3. Operator maintains and operates facility components and equipment in accordance with the permit and their intended use.

- a. Maintenance of Facility Components/Site Grading. 360-1.14(f) (1)  
b. Adequate Equipment. 360-1.14(f) (2)  
c. Staffing 360-3.3 (i)  
d. Drainage 360-3.4 (c)

***GHD Comment 3: Facility components are maintained and operated in accordance with the permit and intended use of the facility. Site grading was observed to be stable and no significant depressions, desiccation cracks, soil erosion or ponding were observed at the Facility. Section 7 of the OM&M (Maintenance Plan) states that the entire Facility will not be shut down due to the failure of a single component or discrete piece of equipment, except under extraordinary conditions. A Staffing Plan is provided in Section 4 of the OM&M. The Facility does have an adequate storm water collection/ discharge system on-site.***

4. Operational Records are available where required:

- a. Unauthorized Solid Waste Records. 360-1.14(i) (1)  
b. Self Inspection Records. 360-1.14(i) (2)  
c. Permit Application Records. 360-1.14(i) (3), 360-3.4 (a)  
d. Monitoring Records. 360-1.14(i) (4)  
e. Facility Operator Records. 360-1.14(u) (1), 360-3.4 (a)

***GHD Comment 4: Operational records are kept at the Facility and were provided to GHD upon request:***

- a. ***Section 11 of the Annual Operating Report details occurrences where unauthorized waste is received at the Facility and its final deposition.***  
b. ***An Annual General Facility Inspection Report is submitted annually as part of the Annual Operating Report.***  
c. ***Permit Applications/ Modifications along with supporting information are available on-site and were provided.***  
d. ***Section 3.10 of the O&M Plan details the procedure for random waste inspections. The Niagara facility inspects a minimum of ten (10) incoming loads each day. The inspection is then documented with the inspection sheet retained on file. Several months of inspection records are maintained at the facility. Older inspection records are archived with a document retention company. Records are stored for seven (7) years. These forms are available in paper form and are for review at the facility but were not reviewed during the audit.***  
e. ***Facility operator records were provided (Permit, O&M Report, Contingency Plan, Annual Report).***

**OPERATION CONTROL**

5. Solid waste, including blowing litter, is sufficiently confined and controlled. 360-1.14(j)  
6. Dust is effectively controlled and does not constitute an offsite nuisance. 360-1.14(k)  
7. On-Site vector populations are prevented or controlled, and vector breeding areas are prevented 360-1.14(l)  
8. Odors are effectively controlled so that they do not constitute a nuisance. 360-1.14(m)

***GHD Comment 5: Solid waste was observed to be sufficiently confined and controlled; there was no blowing litter observed at the facility. There was no fugitive dust observed at the facility; the facility operates a sweeper to keep on-site roads clear of dust. The facility maintains a contract with a licensed vector control contractor (rodent bait boxes were observed at the facility). There were no significant odors present at the facility.***

**WATER**

9. Solid waste is prevented from entering surface waters and/or groundwater. 360-1.14(b) (1)  
10. Leachate is minimized through drainage control or other means and is prevented from entering surface waters. 360-1.14(b) (2); 360-2.17(q)

**GHD Comment 6:** Stormwater runoff is collected in catch basins. The storm water sewer servicing the area around the ash loadout building and cooling tower blowdown travels to the facility's b-sump containment and is pumped to the Niagara Falls Water Board through MS-1 under a permitted discharge. Areas under the scrubbers and baghouses are designed to prevent the migration of ash into the groundwater or surface water; the entire area is paved with asphalt or concrete and sloped to trenches. The trenches connect to the facility's process water recycle sump. Water collected in the process water recycle sump is utilized in the ash extractor for quenching the ash. The facility operates an automatic refuse bunker dewatering system. This system will help keep the bunker dewatered by operating regardless of the refuse level in the bunker. Liquid removed from the refuse bunker is pumped to the liquid direct injection tank system and atomized in the DBA boilers.

**ACCESS**

- 11. Access to the facility is strictly and continuously controlled by fencing, gates signs, natural barriers, or other suitable means. 360-1.14(d) 360-3.4(e)
- 12. On-site roads are passable. 360-1.14(n)

**GHD Comment 7:** Access to the Site is controlled by fencing and 24-hour monitoring by security guards. On-site roads are passable.

**WASTE HANDLING**

- 13. Solid Waste is processed and contained within a completely enclosed area, and on site storage is less than seven times the approved daily design capacity 360-3.4 (b) (2)

**GHD Comment 8:** Solid waste unloading (with the exception of the tank trailers of liquid waste for the liquid injection system), storage, and handling are done inside buildings. The facility receives solid waste in various covered or contained vehicles (i.e. packers, rolloffs, transfer trailers, dump trailers, van trailers, tank trailers, etc.) and containerized waste. Solid waste unloading, storage and handling facilities have been designed to accommodate the processing up to 821,250 tons annually, whether that waste is delivered by over the road trucks or rail containerized waste. Inside the tipping hall, the transfer and dump trailers are normally backed up and unloaded directly into the large concrete refuse bunker. The bunker is designed to provide in excess of three days solid waste storage capacity. This storage capacity allows the facility to handle short term waste flow fluctuations. No solid waste may be stored outside the tipping hall/refuse bunker areas.

- 14. External storage of nonputrescible recyclables or oversize, bulky, or nonprocessable solid waste occurs for less than one week. 360-3.4(b)(3).
- 15. Ash residue is wetted or contained to insure that dust emissions are controlled. 360-3.5(f)(3)

**GHD Comment 9:** There is no storage of nonputrescible recyclables or oversize, bulky, or nonprocessable solid waste. When bulky items are found in the tipping hall, if it is known which truck (hauler/generator or trucking company) delivered the item, the item is put back on the truck. If the source is unknown, then the payload may be used to crush some bulky items and then process them through the furnace. Any bulky items that cannot be put back on the hauler's truck and cannot be processed through the furnace would be pulled out of the waste and sent to the landfill. Metals associated with the bulky items that are processed through the furnace are recovered in the ferrous or nonferrous metal recovery systems and then sent to the scrap metal mill. If the item is a refrigerator or air conditioner that cannot be identified as to the hauler/generator, the item would be inspected to ensure that the freon is no longer in the item. If the tipping floor personnel cannot determine if the freon is no longer in the item, then the item is set to the side of the tipping floor and a certified contractor would be called to inspect the item and, if necessary, remove the freon.

The Ash Management Plan (Section 2 of O&M Plan) details the procedures for the generation, handling, storage, transportation, treatment, and disposal or use of ash. To prevent fugitive dust emissions, the entire bottom ash conveyance and separation processes are done inside buildings and conveyor galleries. After leaving the boiler, the flue gas passes through the flue gas cleaning system which consists of a scrubber followed by a reverse air baghouse. The flyash and scrubber salts are transported in covered conveyors (screw and drag chain) to the flyash surge silo (teacup) located in the ash processing building. The flyash surge silo provides surge capacity while feeding the flyash/scrubber salts via enclosed variable speed screw feeders into pug mills for treatment with water to inhibit dusting. From the pug mills, the wetted flyash drops on top of the bottom ash (system described above) on a loadout belt conveyor which transports the combined ash to the ash hopper for direct truck loadout. Nonferrous materials are loaded out approximately once per week, inside the building, into a truck for transport to the scrap mill. Nonferrous materials, aluminum and copper are not separated at the Niagara facility, but at the processing facility. Any resulting ash residue is to be disposed of as required by regulations and applicable laws. Ash loadout is done inside the ash processing building. After the trucks pull into position under the ash loadout hopper, one of the access doors (usually the south door) on the loadout roadway is closed to reduce the potential for fugitive emissions.

- 16. Ash residue on site storage capacity is sufficient to insure that facility operations continue during short term interruption of transportation and/or disposal:
  - a. Quantity stored 360-3.5 (f)(6)
  - b. Container storage 360-5.6 (f)(6)(i)
  - c. Waste pile storage 360-5.6(f)(6)(ii)
- 17. Ash Residue is drained of free liquid before transport, and transportation containers or vehicles are watertight, leak resistant, and enclosed or covered. 360-3.5 (f)(7)

**GHD Comment 10:** Ash generated by the Covanta Niagara facility is used as daily cover (instead of dirt) in landfills. Currently Modern Corporation transports the ash residue, in their vehicles, to either the Modern Corporation or Republic Services Landfill. Beginning on January 1, 2006, storage of ash on site became necessary because neither Modern Corporation's landfill nor Republic Services' Pine Avenue landfill is open 24 hours per day. Modern Corporation has covered trailers and rolloff boxes in which the ash is stored at the Covanta Niagara facility when the landfills are closed. Ash storage volumes and timeframes are consistent with the Part 360 regulatory limits. In addition, the ash processing building's equipment has been designed to allow the ash to be diverted to a storage area in the northeast corner of the building in the event that loadout into the trucks or rolloff boxes cannot be done. Use of this area in an emergency situation would allow onsite storage of ash for approximately twenty-four hours. The ash could then be loaded out in the ash trucks with front end loaders or processed through the nonferrous metals recovery system. Ash storage capacity in the DBA hoppers, silos, or ash extractors is limited to approximately one hour.



December 9, 2020

Reference No. 11212683

Mr. Chris Schifferli, P.E.  
Covanta Niagara I, LLC  
100 Energy Boulevard  
Niagara Falls, NY 14304

Dear Mr. Schifferli:

**Re: Rail-to-Truck Intermodal Facility Inspection  
Covanta Niagara I, LLC  
Niagara Falls, NY (Permit No. 9-2911-00113/00023)**

GHD is pleased to submit the following letter report to Covanta Niagara I, LLC (Covanta) discussing the results of the recent Rail-to-Truck Intermodal Facility Inspection at the Covanta Plant located in Niagara Falls, New York (Facility or Site). Relevant Site records and a tour of the Covanta facility were provided by Mr. Chris Schifferli (Covanta).

Mr. Richard Snyder P.E. of GHD conducted an inspection of the Rail-to-Truck Intermodal Facility on September 14, 2020. GHD utilized the form provided in Appendix E of the December 2015 Site Management Plan (SMP) during conduction of the inspection. Per the SMP, the Rail-to-Truck Intermodal Facility is to be inspected a minimum of once per year. The results of the inspection are presented as Attachment 1.

The purpose of the inspection is to inspect the following:

- i. Compliance with Institutional Controls (ICs), including site usage
- ii. An evaluation of the condition and continued effectiveness of the Engineering Controls (ECs)
- iii. General site conditions at the time of inspection
- iv. The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection
- v. Compliance with permits and schedules
- vi. Confirmation that site records are up to date

No deficiencies were observed during the inspection performed on September 14, 2020.



GHD appreciates the opportunity to provide these services to Covanta. Should you have any questions, or require additional information or clarification, please do not hesitate to contact the undersigned.

Sincerely,

GHD

A handwritten signature in black ink that reads "SD Wilsey".

Steven D. Wilsey, CHMM

SDW/cs/1

Encl.

A handwritten signature in black ink that reads "Richard J. Snyder".

Richard Snyder P.E.



# Attachments

# Attachment 1

## Results of the Inspection

Site-wide inspections will be performed on a regular schedule at a minimum of once a year. Site-wide inspections will also be performed after all severe weather conditions that may affect Engineering Controls (ECs). During these inspections, this form will be completed. The form will compile sufficient information to assess the following:

1. Compliance with all Institutional Controls (ICs), including site usage.
2. An evaluation of the condition and continued effectiveness of ECs.
3. General site conditions at the time of the inspection.
4. The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection.
5. Compliance with permits and schedules.
6. Confirmation that site records are up to date.

The following pages contain observations recorded during this annual inspection.

Completed by: Richard Snyder (GHD)

Date: September 14, 2020

**1. Compliance with all ICs, including site usage:**

**Date:** September 14, 2020

**SITE USAGE:** Use of the Site is limited to Industrial Uses. Indicate if any other type of use is occurring at the Site.

Only industrial activities are taking place at the Site.

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**GROUNDWATER USAGE:** Use of groundwater underlying the Site is prohibited without treatment. Indicate whether groundwater use is occurring at the Site along with any treatment measures being applied.

There is no groundwater collection or treatment taking place at the Site.

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**VEGETABLE GARDENS & FARMING:** Vegetable gardens and farming are prohibited at the Site. Indicate if gardening or farming is occurring at the Site.

There is no gardening or farming occurring at the Site.

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**COMPLIANCE WITH SMP:** List Site activities and indicate compliance or non-compliance with SMP.

Waste arrives into rail yard on a container. A reach stacker places container onto truck and the truck proceeds to the tipping floor. All engineering and institutional controls are in compliance with the SMP.

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**2. An evaluation of the condition and continued effectiveness of the ECs:**

Date: September 14, 2020

<b>Location</b>	<b>Condition (Good, Fair, Poor)</b>	<b>Effectiveness (As Intended vs. Needs Repair)</b>
<b>Concrete Slabs</b>		
Reach Stacker Pad	Good	As Intended
Container Storage Pad	Good	As Intended
RTIF Building Floor Slabs	Good	As Intended
RTIF Building Exterior Aprons	Good	As Intended
Truck Scale Foundations	Good	As Intended
Diesel Fueling Station Pad	Good	As Intended
Monitoring Station Pad	Good	As Intended
South Truck Turn-Around Pad	Good	As Intended
<b>Asphalt Pavement</b>		
	Good	As Intended
<b>Clean Stone Cover</b>		
Storm Water Overflow Basin	Good	As Intended
Rail Yard	Good	As Intended
<b>Clean Soil Cover</b>		
Earthen Berms	Good	As Intended
Perimeter Green Space	Good	As Intended

**3. General site conditions at the time of the inspection:**

Date: September 14, 2020

**FENCING/SITE CONTROL**

Good; No damage or deterioration of the fence was observed. Gates are controlled to limit access to appropriate deliveries and visitors.

**PAVEMENT-PARKING & INTERIOR ROADS**

Pavement is in good shape for interior roads and parking areas. High traffic areas show minor distress on surface of the asphalt.

**CONCRETE PADS**

Concrete pads in good shape with no unusual settlement or cracking.

**BUILDINGS**

Exterior of buildings are in good shape with no deterioration of surfaces or breaches of the building envelope.

**BERMS/GRASS AREAS**

Good; intact; no erosion or signs of stress on the vegetation.

**DRAINAGE**

Stormwater collection to the sanitary sewer outflow; stormwater overflow used for large rainfall events.

**RAIL YARD**

Waste incoming into the rail yard arrives in shipping containers. A reach stacker removes the container from the rail car and places onto truck which transports the container to the tipping floor.

**STONE SERVICE ROADS**

Idle, good condition with no settlement or deterioration of the roadways in evidence.

**STORM WATER OVERFLOW BASIN**

No water, empty

4. The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection: Date: September 14, 2020

<b>Nature &amp; Extent</b>
No Site management activities occurring during time of inspection.
<b>Contractor(s)</b>
Not Applicable (NA)
<b>Compliance with Excavation Work Plan</b>
NYSDEC Notification Date: NA
NYSDEC Notification Package
NA
<b>Soil &amp; Fill Screening Measures</b>
NA
<b>Stockpiles</b>
NA
<b>Off-Site Disposal Facility:</b> NA
<b>On-Site Re-use Criteria:</b>
NA
<b>Fluid Management</b>
NA

<b>Compliance with Excavation Work Plan (Continued)</b>
<b>Cover System Restoration</b>
NA
<b>SWPP</b>
NA
<b>CAMP</b>
NA
<b>Dust Control</b>
NA
<b>Odor Control</b>
NA
<b>Confirmatory Sampling</b>
<b>Field Methods (COC)</b>
NA
<b>Lab Methods</b>
NA
<b>HASP Compliance</b>
<b>PPE</b>
NA

**5. Compliance with permits and schedules:**

Date: September 14, 2020

**LIST REQUIRED PERMITS AND DATES OBTAINED**

Solid Waste Management Part 360 Permit Renewal issued 4/1/2005  
Solid Waste Management Part 360 Permit Modification #1 issued 4/20/2005  
Solid Waste Management Part 360 Permit Modification #2 issued 6/22/2011  
Solid Waste Management Part 360 Permit Modification #3 issued 2/13/2015  
Title V Air Permit issued 5/2/2014

**SCHEDULE REQUIREMENTS**

Annual Site Inspection (annually)  
Periodic Review Report (annually)



1-31-20

If the radiation detectors alarm: (1) check the Alarm Energy range where the alarm was received (low, mid, or high), and (2) write down the Maximum Reading in the 1<sup>st</sup> Pass row, then:

1. Verify the alarm. It is programmed to sound at 5 times the background.
  - a. Push the Silence button once to silence the audible alarm.
  - b. Have the vehicle back off the scale.
  - c. Push and hold the Silence button for approximately 2 seconds until the green light goes off. After approximately 5 seconds, the green light will go back on.
  - d. Once the green light is back on, have the vehicle slowly pull back on the scale.
2. If the vehicle still alarms, write down the Maximum Reading again in the 2<sup>nd</sup> Pass row, and direct the vehicle to the south end of the switchyard to park. Contact the Environmental Engineer or Shift Supervisor to set a boundary, and padlock it to prevent unloading. RTIF to be redirected to the RTIF Temporary Storage Area.
3. If the vehicle doesn't alarm, repeat Step 1. If it still doesn't alarm, contact the Shift Supervisor, NHPW Manager, or Environmental Engineer who will verify the reading. For RTIF operations, also contact the RTIF Superintendent.
4. Complete the form below with the Hauler, Load Origin, Maximum Reading (in counts per second), Both Background Radiation Readings for Low, Mid, and High Energy as shown on the display, and the Alarm Energy, and email it to the Environmental Engineer and NHPW Manager.
5. When the radiation reading is below 5 times background on both detector heads, contact the Shift Supervisor, NHPW Manager, RTIF Superintendent, or Environmental Engineer to verify, sign this form, and release the load. Email the signed form to the Environmental Engineer.

Hauler/Origin: Beyer Boys / Modern-NEI Transfer Blasdell      Truck/Trailer: Trk 8 / Trailer 2444

ARRIVAL	#1	#2	Background Readings (cps)	#1	#2	DEPARTURE
	10	6	Low Energy			
	9	3	Medium Energy			
	3	3	High Energy			

Alarm Energy (check one)

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant		Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	1-31	160	<i>[Signature]</i>				
2 <sup>nd</sup> Pass	1-31	163	<i>[Signature]</i>				
1 <sup>st</sup> Pass	2/3	9	<i>[Signature]</i>				
2 <sup>nd</sup> Pass	2/3	8	<i>[Signature]</i>				

APPROVED TO UNLOAD OR LEAVE COVANTA: *[Signature]*

## Radiation Detection Form

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5. When the radiation reading is below 5 times background on both detector heads, contact the Shift Supervisor, NHPW Manager, RTIF Superintendent, or Environmental Engineer to verify, sign this form, and release the load. Email the signed form to the Environmental Engineer.

Hauler/Origin: Modern / Blasdell, NY  
 Truck/Trailer: TRK 10 / 2180

ARRIVAL	#1   #2	Background Readings (cps)	#1   #2	DEPARTURE
10	9	Low Energy	5	9.5
11	11.5	Medium Energy	11.5	11
1.5	4	High Energy	4	3

Alarm Energy (check one)

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant		Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	2/11/20	79	A.S.				
2 <sup>nd</sup> Pass	2/11/20	74	A.S.				
3 <sup>rd</sup> Pass	2/12/20	14	JS				
4 <sup>th</sup> Pass	2/12/20	8	JS				

APPROVED TO UNLOAD OR LEAVE COVANTA: \_\_\_\_\_



## Radiation Detection Form

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Hauler/Origin: Modern / Lockport, NY      Truck/Trailer: Trk # 2384

ARRIVAL	#1 #2	Background Readings (cps)	#1 #2	DEPARTURE
	12    9	Low Energy	10    12	
	9    7	Medium Energy	11    8.5	
	3    4	High Energy	3    4	

Alarm Energy (check one)

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant		Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	2-11-20	72	KS		2/13	39	U.S.
2 <sup>nd</sup> Pass	2-11-20	68	KS		2/18	12	KS
1 <sup>st</sup> Pass	2-12-20	43	KS		2/18	13	KS
Pass	2-12-20	43	KS				

APPROVED TO UNLOAD OR LEAVE COVANTA: \_\_\_\_\_

*[Signature]*

## Radiation Detection Form

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Hauler/Origin: Modern / Blasdell, NY  
 Truck/Trailer: TRK 10 / 2180

ARRIVAL	#1 #2	Background Readings (cps)	#1 #2	DEPARTURE
10	9	Low Energy	5	9.5
11	11.5	Medium Energy	11.5	11
1.5	4	High Energy	4	3

Alarm Energy (check one)

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	2/11/20 79	AS
2 <sup>nd</sup> Pass	2/11/20 74	AS
1 <sup>st</sup> Pass	2/14/20 14	AS
Pass	2/14/20 8	AS

Date	Max Reading (cps)	Attendant

APPROVED TO UNLOAD OR LEAVE COVANTA: 

March 1, 2012

Annex A

DOT-SP 11406 SHIPMENT APPROVAL FORM

Approval Number DEC NY NY 01 (Refer to SP 11406, paras. 8a-8b)

This shipment of waste contains unidentified radioactive material causing low levels of radiation outside the transport vehicle. Shipment is under Special permit DOT-SP 11406 without a determination of materials meeting or not meeting the regulatory definition of radioactive material. The shipment is a minor radiological concern based on considerations of the U.S. Department of Transportation and the state official signing this shipment approval document.

DETAILS of DETECTION SITE, MATERIALS, and ORIGIN

Facility: Name Covanta Niagara I, LLC Type: Waste to Energy Incinerator

Address: 100 Energy Boulevard Niagara Falls NY 14304

Contact person: Chris Schifferli Ph. 716-278-8500 Fax. 716-284-9272

Highway or Rail Vehicle Type: Garbage Truck Id.No.: 2384

Company: Modern Corporation Operator name: Jeff White

Contact person: Chet Emel Ph. 716-550-9653 Fax. 716-754-8964

Description of waste and release risks: Unknown radioactive material.

Radiation Measurement 0.015 Date/time performed: 2/11/20 1455

mrem/h (max) 0.018 location on vehicle back of trailer, passenger side, near the floor

Inst.Mfgr./type/model Thermo RadEye PRD Bkg. mrem/h 0.003

Surveyor name: Chris Schifferli Ph. 716-278-8524

Shipment Origin Company: Location: Lockport NY

Waste Origin: Unknown residential property in Lockport, NY

Contact person: Chet Emel Ph. 716-550-9653 Fax. 716-754-8964

RADIATION CONTROL OFFICIALS (Detection, Origin, Transit, Destination States)

Detection State Official (receiving radiation detection info) Name: Timothy Rice

Organization NYSDEC Ph. 518-402-8579 Fax. 518-402-8646

Origin State Official (prior to detection) Name: Thomas Papura

Organization NYSDEC Ph. 518-402-8579 Fax. 518-402-8646

Transit State Official(s) (after detection) Name:

Organization NYSDEC Ph. 518-402-8579 Fax. 518-402-8646

Destination State Official (after detection) Name:

Organization NYSDEC Ph. 518-402-8579 Fax. 518-402-8646

March 1, 2012

SP-11406 Approval Number DEC NY NY 01

Page 2

DESTINATION for RADIOACTIVE MATERIAL IDENTIFICATION and DISPOSITION

If carrier and shipper to this location are different than 2 and 3, show info in REMARKS

Company Name: Modern Corporation Location: 4746 Model City Rd Model City NY 14107

Contact person: Chet Emel Ph. 716-550-9653 Fax. 716-754-8964

APPROVAL of SHIPMENT and SPECIAL CONDITIONS

Date:

Conditions: Recipient must hire a NYSDOH licensed health physics consultant to identify and isolate the radioactive materials unless determined to be naturally occurring radioactive material (NORM) with the assistance of the Department.

Signature: Thomas Papura Ph. 518-402-8579 Fax. 518-402-8646

Title Environmental Radiation Spec. II Organization NYSDEC Date 02-12-2020

IDENTIFICATION of RADIOACTIVE MATERIAL and DISPOSITION INFORMATION at DESTINATION

Name: Title: Date:

Organization: Ph. Fax.

RECORD of TRANSMITTALS (Shipment Approvals and identification/disposition) (Circumstances may influence distribution)

Shipment Approvals (Sent by 4 or 9) to (Show date sent)

OED CRCPD 1, 2, 3,

5, 6, 7, 8,

OTHER

Record of Identification and Disposition (Sent by 8, 10, or other ) to

4, 5, 7, OED CRCPD

OTHER



## Radiation Detection Form

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Hauler/Origin: Paul Fournier/Modern / Blasdell, NY      Trk# PF 38/TK#2726

ARRIVAL	#1	#2	Background Readings (cps)	#1	#2	DEPARTURE
	9	11	Low Energy	9	8	
	13	5	Medium Energy	7	10	
	4	3	High Energy	5	3.5	

Alarm Energy (check one)

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant		Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	2-14-20	87					
2 <sup>nd</sup> Pass	2-14-20	85.5					
1 <sup>st</sup> Pass	2-19-20	12.5					
Pass	2-19-20	11					

APPROVED TO UNLOAD OR LEAVE COVANTA:

Ticket: 1857141  
Date: 3/6/2020  
Time: 13:36:24 - 13:36:28

Truck: 2387  
Customer: 130/MODERN DISPOSAL  
Carrier: 337/MODERN DISPOSAL CANAL

Truck Type: Rear Loading Pumper

Gross: 58120 lb  
Tare: 37120 lb  
Net: 21000 lb  
Scale 1  
P.1.

Comment:

Origin	Materials & Services	Quantity	Unit
1148/Madison City, NY	100% of MSW-TON/MSW-10	10.50	ton

Driver: \_\_\_\_\_

Deputy Weighmaster  
DD 290164

*D. Drange*

Route Collection Info

Load #1	Load #2	Load #3
Scale Ticket #	Scale Ticket #	Scale Ticket #
Disposal Destination	Disposal Destination	Disposal Destination
<i>Colonia TN</i>		
Tons	Tons	Tons

Disposal Notes

*TRUCK IS LOADED WITH LOCKPORT TRASH*

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Hauler/Origin: Modern / Lockport, NY      Trk# 2387

ARRIVAL	#1 #2	Background Readings (cps)	#1 #2	DEPARTURE
	8    10	Low Energy		
	13   6	Medium Energy		
	4    3	High Energy		

Alarm Energy (check one)

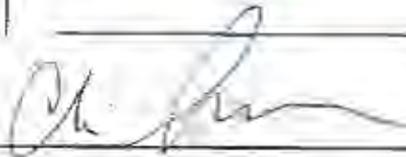
Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	2-4-20	357	KS
2 <sup>nd</sup> Pass	2-4-20	323	KS
1 <sup>st</sup> Pass			
2 <sup>nd</sup> Pass			

Date    Max Reading (cps)    Attendant

- identified as I-131 - vehicle left site. Background =  $4 \mu\text{rem/h}$

Load =  $6 \mu\text{rem/h}$

APPROVED TO UNLOAD OR LEAVE COVANTA: 

## Radiation Detection Form

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Hauler/Origin: Modern (P.F.) / Blasdel II, NY PF38/2726  
 Truck/Trailer: PF38/2726

ARRIVAL	#1	#2	Background Readings (cps)	#1	#2	DEPARTURE
	13	8	Low Energy	10.5		8
	9	7	Medium Energy	8		9
	4	6	High Energy	2		3.5

Alarm Energy (check one)

Low (Orange light only)    
  Medium (both Orange and Red lights)    
  High (Red light only)

	Date	Max Reading (cps)	Attendant		Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	4-10	102.5	KS				
2 <sup>nd</sup> Pass	4-10	101	KS				
1 <sup>st</sup> Pass	4-15	10.5	KS				
1 <sup>st</sup> Pass	4-15	8	KS				

APPROVED TO UNLOAD OR LEAVE COVANTA:

B. J. 4-15-20

4-15-20

# Radiation Detection Form

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Hauler/Origin: Town of Tonawanda/Tonawanda, NY Trk# B  
 Truck/Trailer: \_\_\_\_\_

ARRIVAL	#1	#2	Background Readings (cps)	#1	#2	DEPARTURE
	7	6	Low Energy	7	8	
	12	14	Medium Energy	8	10	
	3	3	High Energy	6	3	

**Alarm Energy (CHECK ONE)**

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant		Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	6-3-20	86.4	KD				
2 <sup>nd</sup> Pass	6-3-20	82.2	KD				
1 <sup>st</sup> Pass	6-30-20	8	KD				
2 <sup>nd</sup> Pass	6-30-20	10	KD				

THE VEHICLE WAS LOCKED ON: 6-3-20 BY Brian Redanz  
DATE NAME

APPROVED TO UNLOAD OR LEAVE COVANTA: Brian Redanz 6-30-20

# Radiation Detection Form

If the radiation detectors alarm: (1) check the Alarm Energy range where the alarm was received (low, mid, or high), and (2) write down the Maximum Reading in the 1<sup>st</sup> Pass row, then:

1. Verify the alarm. It is programmed to sound at 5 times the background.
  - a. Push the Silence button once to silence the audible alarm.
  - b. Have the vehicle back off the scale.
  - c. Push and hold the Silence button for approximately 2 seconds until the green light goes off. After approximately 5 seconds, the green light will go back on.
  - d. Once the green light is back on, have the vehicle slowly pull back on the scale.
2. If the vehicle still alarms, write down the Maximum Reading again in the 2<sup>nd</sup> Pass row, and direct the vehicle to the south end of the switchyard to park. Contact the Environmental Engineer or Shift Supervisor to set a boundary, and padlock it to prevent unloading. RTIF to be redirected to the RTIF Temporary Storage Area.
3. If the vehicle doesn't alarm, repeat Step 1. If it still doesn't alarm, contact the Shift Supervisor, NHPW Manager, or Environmental Engineer who will verify the reading. For RTIF operations, also contact the RTIF Superintendent.
4. Complete the form below with the Hauler, Load Origin, Maximum Reading (in counts per second), Both Background Radiation Readings for Low, Mid, and High Energy as shown on the display, and the Alarm Energy, and email it to the Environmental Engineer and NHPW Manager.
5. When the radiation reading is below 5 times background on both detector heads, contact the Shift Supervisor, NHPW Manager, RTIF Superintendent, or Environmental Engineer to verify, sign this form, and release the load. Email the signed form to the Environmental Engineer.

Hauler/Origin: Modern / Amherst PK# 2389  
 Truck/Trailer: \_\_\_\_\_

ARRIVAL	#1 #2	Background Readings (cps)	#1 #2	DEPARTURE
8.5	8.5	Low Energy	7.5	9.5
13	10	Medium Energy	11	6
5	3.5	High Energy	7	4

**Alarm Energy (CHECK ONE)**

Low (Orange light only)     
  Medium (both Orange and Red lights)     
  High (Red light only)

	Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	8-7-20	92	KS
2 <sup>nd</sup> Pass	8-7-20	88	KS
1 <sup>st</sup> Pass	8-21-20	37	KS
2 <sup>nd</sup> Pass	8-21-20	36.5	KS

**THE VEHICLE WAS LOCKED ON:** 8-7-20 BY Brian Rehanz  
DATE NAME

**APPROVED TO UNLOAD OR LEAVE COVANTA:** [Signature] 8-28-20

## Radiation Detection Form

If the radiation detectors alarm: (1) check the Alarm Energy range where the alarm was received (low, mid, or high), and (2) write down the Maximum Reading in the 1<sup>st</sup> Pass row, then:

1. Verify the alarm. It is programmed to sound at 5 times the background.
  - a. Push the Silence button once to silence the audible alarm.
  - b. Have the vehicle back off the scale.
  - c. Push and hold the Silence button for approximately 2 seconds until the green light goes off. After approximately 5 seconds, the green light will go back on.
  - d. Once the green light is back on, have the vehicle slowly pull back on the scale.
2. If the vehicle still alarms, write down the Maximum Reading again in the 2<sup>nd</sup> Pass row, and direct the vehicle to the south end of the switchyard to park. Contact the Environmental Engineer or Shift Supervisor to set a boundary, and padlock it to prevent unloading. RTIF to be redirected to the RTIF Temporary Storage Area.
3. If the vehicle doesn't alarm, repeat Step 1. If it still doesn't alarm, contact the Shift Supervisor, NHPW Manager, or Environmental Engineer who will verify the reading. For RTIF operations, also contact the RTIF Superintendent.
4. Complete the form below with the Hauler, Load Origin, Maximum Reading (in counts per second), Both Background Radiation Readings for Low, Mid, and High Energy as shown on the display, and the Alarm Energy, and email it to the Environmental Engineer and NHPW Manager.
5. When the radiation reading is below 5 times background on both detector heads, contact the Shift Supervisor, NHPW Manager, RTIF Superintendent, or Environmental Engineer to verify, sign this form, and release the load. Email the signed form to the Environmental Engineer.

Hauler/Origin: Town of Tonawanda Truck/Trailer: Truck # C

ARRIVAL	#1 #2	Background Readings (cps)	#1 #2	DEPARTURE
	8.5	Low Energy	9.5	7
	13	Medium Energy	9	5.5
	2.5	High Energy	2	1.0

Alarm Energy (CHECK ONE)		
<input checked="" type="checkbox"/> Low (light only)	<input type="checkbox"/> Medium (both and Red lights)	<input type="checkbox"/> High (Red light only)

Date	Max Reading (cps)	Attendant	Date	Max Reading (cps)	Attendant
1 <sup>st</sup> Pass	12-16-20	50	12	3.5	DD
2 <sup>nd</sup> Pass	12-16-20	58	12	4.0	DD
1 <sup>st</sup> Pass	12-29-20	16			
2 <sup>nd</sup> Pass	12-29-20	50			

THE VEHICLE WAS LOCKED ON: 12/16/20 BY Chris Schifferli  
DATE NAME

APPROVED TO UNLOAD OR LEAVE COVANTA: Sm [Signature] 1-4-21







100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## **Waste Rejection Notice**

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 7267

NYSDEC Approval Number: 15-062

Material Description: Powders in steel drums

Date delivered: 01/15/2020

Broker Name (if applicable):

Number of Containers Rejected: 4 drums (1 pallet)

Manifest / BOL Number: 019135812jjk

Transporter: Haz Mat

Date to be picked up: rejected back on same truck

Additional Information: we cannot accept powders in steel drums

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 294 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 7117

NYSDEC Approval Number: 02-45

Material Description: Silicone Industrial Waste

Date delivered: 2/25/20

Broker Name (if applicable): N/A

Number of Containers Rejected:

Manifest / BOL Number: 0197255991JJK

Transporter: EQ industrial Services

Date to be picked up: TBD

Additional Information: Unapproved Material

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 276 8520 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 19022

NYSDEC Approval Number: 02-452

Material Description: Powder in steel drums

Date delivered: 2/27/20

Broker Name (if applicable): N/A

Number of Containers Rejected: 8 pallets (32 drums)

Manifest / BOL Number: 019734333jjk

Transporter: EQ industrial Services

Date to be picked up: Rejected back same day on same truck

Additional Information: Niagara cannot accept / process powders in steel drums

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



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## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 6684

NYSDEC Approval Number: 01-77

Material Description: Rolls larger than 8" in diameter – Load shifted, too unstable to unload

Date delivered: 03/20/19

Broker Name (if applicable): Collie Corp

Number of Containers Rejected: about 1/3 of the load

Manifest / BOL Number: 2558

Transporter: Regional Logistics

Date to be picked up: Rejected back on same truck

Additional Information:

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2981

## **Waste Rejection Notice**

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 13002

NYSDEC Approval Number: 15-094

Material Description: Powders in totes

Date delivered: 05/05/2020

Broker Name (if applicable):

Number of Containers Rejected: 2 totes

Manifest / BOL Number: 248783

Transporter: RPR Environmental

Date to be picked up: 5/12/20

Additional Information: we cannot accept powders in totes

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 279 8520 / Fax 716 284 2961

## **Waste Rejection Notice**

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 7267

NYSDEC Approval Number: 15-062

Material Description: Powders in steel drums

Date delivered: 07/01/2020

Broker Name (if applicable):

Number of Containers Rejected: 4 drums (1 pallet)

Manifest / BOL Number: 019135879jjk

Transporter: Haz Mat

Date to be picked up: rejected back on same truck

Additional Information: we cannot accept powders in steel drums

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8620 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 7059

NYSDEC Approval Number: 19-044

Material Description: Resin beads in totes

Date delivered: 07/02/2020

Broker Name (if applicable): Waste Resource Management

Number of Containers Rejected: 2 totes (3678 est lbs)

Manifest / BOL Number: 0070220

Transporter: Haz Mat

Date to be picked up: Aug 12<sup>th</sup> 2020

Additional Information:

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## **Waste Rejection Notice**

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 11467

NYSDEC Approval Number: 07-15

Material Description: Silicone

Date delivered: 08/10/2020

Broker Name (if applicable):

Number of Containers Rejected: approx. 8 pallets (32 drums)

Manifest / BOL Number: 35491

Transporter: Env Service Group

Date to be picked up: rejected back on same truck

Additional Information: Trailer deemed unsafe from prior damage to finish offloading

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 18089

NYSDEC Approval Number: 19-037

Material Description: glass solar panels

Date delivered: 8/11/20

Broker Name (if applicable):

Number of Containers Rejected: entire load

Manifest / BOL Number: na

Transporter: Covanta Environmental Solutions

Date to be picked up: Rejected back same day on same trailer

Additional Information: Trailer could not be safely secured to our portable ramp

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## **Waste Rejection Notice**

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 13002

NYSDEC Approval Number: 15-094

Material Description: Rock hard monolithic solids in totes

Date delivered: 08/18/2020

Broker Name (if applicable):

Number of Containers Rejected: 9 totes (9000kg ~ 19845lbs)

Manifest / BOL Number: 249802

Transporter: RPR Environmental

Date to be picked up: TBD

Additional Information:

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected,

Covanta Approval Number: 17758

NYSDEC Approval Number: 19-009

Material Description: Large (36") Dia spools of poly strapping

Date delivered: 08/26/2020

Broker Name (if applicable):

Number of Containers Rejected: 20 spools (~ 15320lbs)

Manifest / BOL Number: u52204

Transporter: Guard

Date to be picked up: 10/02/20

Additional Information:

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 11467

NYSDEC Approval Number: 97-15

Material Description: Black Powder

Date delivered: 09/28/2020

Broker Name (if applicable):

Number of Containers Rejected: approx. 1 pallet (4 drums) ~1690 lbs

Manifest / BOL Number: 36041

Transporter: Env Service Group

Date to be picked up: 09/30/20

Additional Information: Cannot accept powders in steel drums

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 7302

NYSDEC Approval Number: 99-85

Material Description: Toner powder

Date delivered: 10/30/20

Broker Name (if applicable):

Number of Containers Rejected: 1 pallet (628 lbs est.)

Manifest / BOL Number: 048118

Transporter: Ryder

Date to be picked up: TBD

Additional Information: Customers request

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan



100 Energy Blvd, Niagara Falls, NY 14304  
Tel 716 278 8520 / Fax 716 284 2961

## Waste Rejection Notice

The following material was identified by Covanta personnel during a waste inspection and rejected.

Covanta Approval Number: 7302

NYSDEC Approval Number: 99-85

Material Description: Toner powder

Date delivered: 12/27/19

Broker Name (if applicable):

Number of Containers Rejected: 2 drums

Manifest / BOL Number: 609114

Transporter: Ryder

Date to be picked up: 1/6/20

Additional Information: steel drums of toner powder

This material has been isolated from the other waste, and unless otherwise directed by the NYSDEC, the broker/generator will be/was contacted to remove it from Covanta.

Inspected and Rejected By: Mike Finnegan

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Reviewed Date: 2/23/21	

## **SECTION 10**

### **COVANTA NIAGARA I, LLC**

#### **Niagara Resource Recovery Facility**

#### **CLOSURE PLAN**

The following steps will be taken when the closing of the Covanta Niagara facility is anticipated.

1. Covanta Niagara will notify in writing the NYSDEC.
2. Covanta Niagara will not accept any waste after the date closure is to begin.
3. Within 30 days after receiving the final quantity of waste, Covanta Niagara will:
  - Either combust or dispose (at an appropriate disposal location) all solid waste on hand.
  - Clean up all solid waste from the solid waste storage areas – tipping floor, refuse bunker, and boiler feed systems.
  - Clean all boilers (walls, tube sections, etc.) of ash residue.
  - Clean all pollution control devices (scrubbers, baghouse filters, etc.) of ash residue, treatment chemicals, etc.
  - Remove ash and clean all ash silos, conveyors and ash extractors.
  - Clean out all sumps, trenches, etc.
  - Clean all outside areas, including the RTIF area, of any debris.
  - Remove any residual liquids from the liquid waste injection storage tanks.
  - Wash the inside of the liquid waste injection storage tanks.
  - Submit an annual report to the Department.
4. All ash and residual solid waste will be taken to an approved (NYSDEC) disposal site within 60 days after receiving the final quantity of waste.
5. Within 90 days after receiving the final quantity of solid waste, Covanta Niagara will:
  - Empty and then mothball all tanks containing water treatment, air pollution control, and fire suppression chemicals.
  - Remove from site and properly dispose of, all chemicals (some of which could be returned to vendor) in bags, pails, totes, drums, etc
  - Empty all storage tanks, equipment reservoirs, etc. that contain fuel oil, hydraulic oil, diesel fuel etc.
  - Remove from site and, if necessary, properly dispose of (some of which could be returned to vendor) all fuel oils, hydraulic oils, electrical oils, hydraulic oil drums full or empty, grease containers full or empty, etc.
  - Drain all pipe lines. Properly dispose of all oils and chemicals. All removed/recycled chemicals shall be documented and provided to the Professional Engineer for inclusion with the facility closure inspection report.
  - Disconnect all utilities, including water, gas, telephone, and electrical services (using appropriate methods) to all electrical equipment unless equipment is to remain connected for periodic exercising.
  - Unmanned gates and buildings will be locked.

6. After closure has been completed, Covanta Niagara will have a licensed professional engineer (licensed to practice in New York State) inspect the facility and assure that closure has been done in accordance with the steps above.
7. After the licensed professional engineer has completed the facility inspection, a certification that the facility has been closed in accordance with this plan will be submitted to the NYSDEC.

An estimated cost to close the facility is shown in Table 10-1. The costs have been updated for an inflation factor calculated as shown below.

**Table 10-1**  
**CLOSURE PLAN COST ESTIMATE**

Description	Cost
1. Clean Up All Solid Waste From the Solid Waste Staging Areas	
Tipping Floor	\$7,104
Refuse Bunker (100% Capacity is 10,000 tons)	\$669,807
(Loading, transportation, and disposal for 10,000 tons at \$66.98/ton)	
Surge Bin(includes disinfectant wash)	\$4,567
Charging Deck (includes disinfectant wash)	\$7,104
Boiler Feed System	\$17,623
Cranes	\$7,104
C-Building	\$16,238
Surge Bins	\$3,552
RTIF Rail Containers (100% Capacity is 144 Containers)	\$345,052
(Loading, transportation, and disposal @ \$2,396.19/container)	
2. Clean All Boilers of Ash Residue	
No. 3 and No. 4 Boiler Tubes	\$34,505
No. 1 and 5 Boiler Tubes	\$7,104
No. 3 and No. 4 Boiler Roller Grates	\$48,616
No. 3 and No. 4 Boiler Sifting Ash Hoppers	\$38,893
3. Clean All Pollution Control Devices of Ash Residue and Treatment Chemicals	
No. 3 and No. 4 Boiler Scrubbers	\$42,539
No. 3 and No. 4 Boiler Baghouse Filters	\$91,155
No. 3 and No. 4 Boiler Flue Gas Ducts	\$42,539
Cooling Tower Basin	\$20,297
DBA Stacks (bottom)	\$3,552

Tank Closure of CBS/PBS Tanks	\$20,297
4. Remove All Fly and Bottom Ash	
No. 3 and No. 4 Boiler Ash Extractors	\$26,739
Boiler Chain Drags	\$3,552
Boiler Conveyors	\$608
Boiler Ash Silo	\$10,149
DBA, Ash Load Out Building, SDA, Baghouse, and Associated Equipment	\$212,695
(Estimated to be 500 tons total of ash collected, loaded, transported, and disposed of at \$425.39/ton.	
\$66.98/ton is for transportation and disposal and \$358.41/ton in labor for collection and loading)	
5. Clean Out All Sumps, Trenches, etc.	
DBA Boilerhouse Sumps	\$10,149
DBA Boiler's Baghouse Trenches	\$5,469
ALO	\$30,446
"A" Building	\$14,208
"B" Building	\$10,149
"C" Building	\$30,446
Surface Water Sump	\$14,208
RTIF Sump/Wastewater Discharge	\$1,033
Stormwater System Cleaning	\$34,031
6. Clean All Outside Areas of Any Debris	\$18,267
7. Clean the Liquid Waste Injection Storage Tanks	
Remove and Dispose of Stored and Residual Liquid Wastes (300,000 gal * \$1.353/gal)	\$405,944
Wash the Inside of all the Liquid Waste Storage Tanks	\$26,386
8. Empty and Clean All Chemical Tanks	
Water Treatment	\$18,267
Air Pollution	\$10,555
Fire Suppression Chemicals	\$5,582
9. Remove From Site and Properly Dispose of Chemicals in Bags, Pails, Totes, Drums. (Some can be returned to vendor.)	\$40,108
10. Empty All Storage Tanks, Equipment Reservoirs that Contain Fuel Oil, Hydraulic Oil, Diesel Fuel	
Quench Tank Area	\$608

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Reviewed Date: 2/23/21

Surge Bins	\$608
"C" Building Parascrews	\$1,215
DBA Boilers' Ash Extractors	\$26,739
ALO Building Clam Shells	\$3,552
"D" Building Turbines	\$12,154
DBA Boiler's Atomizers	\$5,469
RTIF Tanks	\$3,552
11. Remove From Site and, If Necessary, Properly Dispose of All Fuel Oils, Electrical Oils, Drums, Grease, etc.	\$23,342 \$6,077
Divestiture of the RTIF containers	\$4,465
Divestiture of all Mobile Equipment	\$30,385
12. Drain All Pipe Lines, Properly Dispose of All Oils / Chemicals	\$103,309
13. Disconnect Electrical Services to All Electrical Equipment Unless Equipment Is To Remain Connected for Periodic Exercising.	\$20,297
14. Wastewater Discharge Fees	\$30,446
Sub-Total Cost	\$2,407,449
5% Contingency:	\$120,372
Total Cost:	\$2,527,821
Inflation Factor:	1.0171242
Calculated per 360.22(b)(2)(iii), 6 NYCRR 373-2.8 (C) 2 and <a href="https://www.eia.gov/opendata/qb.php?category=1039997&amp;sdid=STEO.GDPDIUS.A">https://www.eia.gov/opendata/qb.php?category=1039997&amp;sdid=STEO.GDPDIUS.A</a>	
Updated Closure Cost:	\$2,571,108

### Major Revisions:

11/8/05

Facility name change from American Ref-Fuel Company of Niagara to Covanta

3/19/12

Plan modified to include the clean out and washing of the liquid waste injection storage tanks when the facility is closed

5/29/13

Costs revised and updated to 2012 dollars. Decommissioned equipment have been removed from Table 10-1.

3/8/14

Revise Section from Number 11 to Number 10.

4/10/14

Update closure costs to include RTIF.

5/8/14

Expanded RTIF components require for Closure. Minor QA/QC updates. Added text to Table 10-1 to clarify line items.

7/17/15

Update costs to 2015 dollars.

8/14/15

Revision to item 3, bullet 1, on page 2.

12/8/15

Minor update to Closure Costs, Table 10-1.

12/27/17

Updates throughout based on updated Part 360 regulations.

3/27/18

Updated costs.

12/26/2019

Updated costs.

5/20/20

Updated costs.

9/29/20

Update costs to include quantity and unit cost of Refuse Disposal (bunker), RTIF Rail Containers, DBA Ash Building, and Liquid Waste line items.

2/23/21

Update costs.

## Increase PENALTY RIDER

BOND AMOUNT \$2,527,821.00

BOND NO. SUR0065117

To be attached and form a part of Bond No. SUR0065117 dated the 1st day of November, 2020, executed by Argonaut Insurance Company as surety, on behalf of Covanta Niagara I, LLC as current principal of record, and in favor of New York State Department of Environmental Conservation, as Obligor, and in the amount of Two Million Five Hundred Twenty Seven Thousand Eight Hundred Twenty One Dollars and 00/100 (\$2,527,821.00),

In consideration of the agreed premium charged for this bond, it is understood and agreed that Argonaut Insurance Company hereby consents that effective from the 1st day of March, 2021, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE increased:

FROM: Two Million Five Hundred Twenty Seven Thousand Eight Hundred Twenty One Dollars and 00/100 (\$2,527,821.00)

TO: Two Million Five Hundred Seventy One Thousand One Hundred Eight Dollars and 00/100 (\$2,571,108.00)

The increase of said bond penalty shall be effective as of the 1st day of March, 2021, and does hereby agree that the continuity of protection under said bond subject to changes in penalty shall not be impaired hereby, provided that the aggregate liability of the above mentioned bond shall not exceed the amount of liability assumed by it at the time the act and/or acts of default were committed and in no event shall such liability be cumulative.

Signed, sealed and dated this 27th day of January, 2021.

Covanta Niagara I, LLC  
PRINCIPAL

  
\_\_\_\_\_

Argonaut Insurance Company  
SURETY

  
\_\_\_\_\_

Sharon A. Foub, ATTORNEY-IN-FACT

THE ABOVE BOND IS HEREBY AGREED TO AND ACCEPTED BY:

New York State Department of Environmental Conservation  
OBLIGEE

BY: \_\_\_\_\_

TITLE

**Argonaut Insurance Company**  
**Deliveries Only: 225 W. Washington, 24th Floor**  
**Chicago, IL 60606**

**United States Postal Service: P.O. Box 469011, San Antonio, TX 78246**

**POWER OF ATTORNEY**

KNOW ALL MEN BY THESE PRESENTS That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois, does hereby nominate, constitute and appoint:

William T. Krumm, Sharon A. Bouk, Jodie Sellers, Patrick M. Gallagher, Karen E. Seeba, Kathleen Weayer, Jon A. Schroeder

Then (one and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above) to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of

\$85,000,000.00

This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED: That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 4th day of May, 2017.



Argonaut Insurance Company

by

Justin C. Deitz, Senior Vice President

STATE OF TEXAS  
COUNTY OF HARRIS SS

On this 8th day of May, 2017 A.D., before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal of the County of Harris, this day and year first above written.



Kathleen M. M. M. M.  
(Notary Public)

I, the Undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of said Company, on the 17th day of January, 2021.



James Hazard, Vice President-Surety