Covanta Niagara – Facility Audit Questionnaire
06.08.06

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Site Management

1. Provide facility name and address, including corporate structure, EPA ID number, any State or Federal permits and ID numbers.

Facility Name and Address
Covanta Niagara
100 Energy Blvd @ 56th Street
Niagara Falls, New York 14304
Tel: (716) 284-0031

EPA ID Number

NYD986930543 (only for use in accepting used oil contaminated material)

NYSDEC Facility Number

32 E 01

Title	Permit No.	Effective	Expiration
New York State Department of Environmental Conservation (NYSDEC)			
Air Title V	9-2911-00113/00023	Renewal Pending	Application Submitted
Solid Waste	9-2911-00113/00023	4/1/2005	3/31/2015
SPDES Discharge	NY-010 6259 NYSDEC 9-2911-00113/00007	12/1/2005	11/30/2010
Hazardous Substance Bulk Storage Certification	9-000239 (NYSDEC)	5/24/2005	7/27/2007
Petroleum Bulk Storage	9-221279	5/27/2003	6/1/2008
City of Niagara Falls			
Sanitary Sewer Discharge	32 (City of Niagara Falls POTW)	9/29/2005	9/29/2010

Corporate Structure

The facility is owned and operated by Covanta Niagara

2. Provide financial statement and amount of security, review of closure and post closure estimates.

Company is a subsidiary of Covanta Holding. Covanta Holding is publicly traded on the NY Stock Exchange – ticker symbol – CVA. The facility has a closure plan on file with the NYSDEC. The plan requires facility clean up after closure. No long term monitoring is required.

3. List of acceptable wastes, permitted volumes and final disposal of ash.
Non-hazardous waste: residential, commercial, and industrial.

Industrial waste streams can only be accepted with prior approval from Covanta Secure Services and the NYSDEC. Covanta Secure Services has a comprehensive Waste Review Process. Waste generators must complete a Material Characterization Form and provide supporting documentation which represents the waste material.

Treatment provided is combustion in mass burn furnace/boiler. Pollution control includes: good combustion for organic control, urea injection for NOx control, Spray dry absorber (lime injection) for acid gas control, carbon injection for mercury control, baghouse filtration for particulate control.

The facility is required to do a complete round of compliance stack testing on each furnace/boiler every 12 months.

Ash residue is currently being sent to two (2) local landfills (double composite liner, leachate collection, leak detection, etc). The ash is currently tested for TCLP metals every six (6) months.

Solid waste permit annual limit - 821,250 tons

4. Provide the following insurance information, comprehensive general liability, workers compensation, environmental impairment and indemnity liability.

Insurance information is available on this website.

5. Is there on-site security and in-house inspections (self audit)?
There is a 24-hour, around the clock security force on site. Various in-house inspections/monitoring are done on a daily basis - these are recorded in operator and shift logs. Monthly inspections are done on No. 2 Oil and Chemical (water treatment) storage tanks. The Corporate Environmental Group does a semi-annual inspection (documented).

Site History

1. What was the site used for prior to current operations?
American Ref-Fuel owned and operated the facility until June 2005. Occidental Chemical Corporation owned the facility until May 1993. They operated the refuse derived fuel combustion boilers (now retired from burning municipal waste). Prior to Occidental, the site was owned by Union Carbide Corporation and was the site of various metal processing operations.

2. How old is the current operation?

Covanta Holding acquired American Ref-Fuel in June 2005. American Ref-Fuel assumed ownership of the existing refuse derived fuel combustion facility from Occidental in May 1993. In August 1994 construction of the new DBA mass burn facility began. The new facility started up in July 1996.

3. Has the site operations changed significantly or has the site been modified since waste treatment (incineration) began on site?

Yes. In August 1994 construction began on the new DBA mass burn combustion

furnace/boilers with all the accompanying pollution control equipment. The new DBA process started up in July 1996.

4. What treatment or storage methods were used in the past which are not currently active?

None.

5. How long is the final product (ash) stored on site?

Less than one day.

6. List all reported spills or State or Federal violations in the last three years.

Several small oil/fuel spills - hydraulic hose / diesel fuel leaks from trucks transporting solid waste into the facility have been reported to the NYSDEC. No significant spills have occurred.

7. Are there any consent decrees or litigation pending?

No.

Site Setting

1. Identify neighbors who might potentially be affected by site operations or an accidental spill or release to the environment.

The site is immediately bordered by heavy industry. Residential neighbors are approximately 1/2 mile to the east and west.

2. Are there any sensitive populations or areas within three miles of the site, i.e., school, hospitals, wetlands, parks, wildlife management areas, recreation or drinking water sources?

Yes, schools are located within 3 miles of our site.

3. Identify the closest residential populations, i.e., distance.

Approximately 1/2 mile to the east.

4. What is the drinking water source in the area?

Niagara River.

5. Are any wells used to supply drinking water in the area?

None known. Municipal supplied water.

6. Identify the depth to groundwater.

Approximately 30 feet. Perched water is closer to grade.

7. Does the facility emit any significant air emissions which might potentially affect workers and/or the local population?

No.

Regulatory Compliance

1. Are all permits current?

Yes

The Title V renewal application was submitted to the NYSDEC in July 2004 and is currently in the NYSDEC's renewal process.

2. Are permits up for renewal in the following year?

No

3. Have any permits expired or been revoked?

No.

4 Is the facility complying with all requirements of the permit?

Yes

5. Has the facility been issued any notices of violation in the last five (5) years? If yes, what are the nature of the violations and what steps have been taken to address the issues?

None in the last 5 years. Previously there were three notices of violation for sanitary sewer water discharge with pH below 5 for more than 5 minutes. All three discharges were approximately 5-7 minutes. In response the Neutralization tank operating procedures have been revised (1999).

The facility received a notice of violation for an exceedance of a stack test parameter. The NYSDEC concluded that the exceedance was a result of a design flaw. The design flaw was corrected and subsequent testing demonstrated that all parameters are within permit limits (1998).

6. Is the Facility currently under a consent decree or order? If yes, what are the nature of the violations and what steps have been taken to address the issues?

No.

7. Please provide all necessary documentation provided by State or Federal authorities that indicate that are ash is legally considered non-hazardous.

This information is available at the facility. The ash is sampled and analyzed every six (6) months. The ash tests to be non-hazardous.

8. Is the following training given to employees?

(a) Hazardous (RCRA) and/or non-hazardous waste handling procedures.

Yes

(b) OSHA Hazard Communications and Right to Know, if applicable.

Yes

(c) OSHA 1910.120 (Emergency Response Training), if applicable.

Not Applicable

9. Does the facility have a contingency plan or emergency response plan?

Yes - contingency plan.

10. When was the plan last revised?

November 2005

Waste Handling & Containment

1. Is any waste that is delivered to the facility for processing contained in drums on-site? If yes, is the containment area diked, in good condition, impervious and orderly?

Drums containing liquids and solids are processed through a shredder prior to introduction into the refuse bunker. The drums may be staged on the tipping floor for a brief period (normally less than one (1) day) before being processed through the shredder. Drums containing powders are put directly through the furnace / boiler. Containers of powder may also be staged on the tipping floor for a brief period prior to processing

2. Is waste that is delivered to the facility for processing contained in tanks on-site? If yes, are tanks in good condition and what is their approximate age?

Some Bulk liquid wastes are directly injected into the combustion units through a liquid injection system. The bulk liquid wastes are offloaded into a storage tank(s) and then pumped from the tank into the boiler. (Covanta Niagara defines bulk liquids as being greater than 5,000 gallons)

3. What is the permeability of the diking and containment structures utilized on-site?

Not applicable.

4. How is runoff from containment or operations managed?
Stormwater is collected in catch basins and conveyed to a collection sump, from which

the water is pumped to the Niagara River. All waste is stored in side a building - stormwater does not contact any waste holding area.

5. Is the facility regulated under a NPDES permit?

Yes – SPDES permit.

6. Is waste handled in such a way as to prevent releases, contact with incompatibilities or safety hazards, i.e., ground, segregation, etc.?

Yes.

Services

1. What method of treatment, storage or disposal are offered by the facility, i.e., storage method, treatment and disposal methods on site?

Incineration, Assured Destruction.

2. What types of waste is the facility permitted to accept?

Non-hazardous waste, NYSDEC approved non-hazardous industrial waste, Used oil contaminated materials

3. Are there any limits to the quantity?

Yes, 821,250 tons/year of non hazardous wastes.

4. How is each specific waste type handled or treated on site?

All incoming waste fed to the waste bunker is unloaded and stored inside a building. Storage is in concrete refuse bunker (nominal capacity 8,000 tons). Overhead cranes feed the waste into two mass burn combustion furnace / boilers.

Bulk liquid wastes are unloaded into a storage tank(s) or directly fed into the combustion units from the delivery truck.

5. Does the facility broker any waste off site? If yes, which waste and where?

No.

6. Is the facility backed by a parent company? If yes, what is the name of that company?

Yes. Covanta Holding, 40 Lane Road, Fairfield, NJ 07004

Quality Control - Waste Receipt and Analysis

1. What type of waste approval process is used at the facility?

A completed Covanta Material Characterization Form (MCF) is submitted by the Generator or their Agent along with supporting documentation and a New York State Department of Environmental Conservation application for treatment or disposal of an industrial waste. Once that information is reviewed and approved by the Covanta Secure Services Environmental Health and Safety Group, the documentation is submitted to the Covanta Niagara Environmental Engineer for review and subsequent submittal to the NYSDEC for their approval.

The generator (or their agent) is responsible for submitting to the Covanta Secure Services group

– a Covanta MCF along with supporting documentation (i.e. analytical data, material safety data sheet, product insert, etc.

- a NYSDEC Application for Treatment or Disposal of an Industrial Waste (47-19-7 form)

2. What types of analysis are conducted on waste received at the facility prior to admittance?

Analysis requirements will vary depending on waste streams. If necessary the CSS EHS group will ask for additional information.

3. Is the analysis adequate to verify the waste stream and to prohibit waste which the facility is not permitted to receive?

Yes - Generator must demonstrate that waste is non-hazardous. With industrial waste streams specific analysis may be required. Non-Hazardous certification by the generator is required.

4. Does the facility track waste and maintain records on receipt, analysis and destruction or disposal?

Yes.

Residuals Management

1. What residues are generated from on-site processes, i.e., ash, empty drums, spent carbon, bio-sludge, filters, etc.?

Ash residue, ferrous and non-ferrous metals.

2. What methods are used for disposal of residues generated at the Facility or site?

Contractors are used to haul the ash residue to two (2) local landfills. The ferrous and non-ferrous metals are transported to scrap metal mills.