

July 23, 2021

Mr. Francis Steitz  
Stationary and Area Sources Committee  
Ozone Transport Commission (OTC)  
89 South Street, Suite 602  
Boston, MA 02111

Subject: Municipal Waste Combustor Workgroup Report  
June 2021


Dear Mr. Steitz:

During the June 15, 2021 OTC's Commissioners meeting, the Stationary and Area Sources Committee presented its Municipal Waste Combustor (MWC) Workgroup Report (dated June 2021) that summarized research and recommendations related to NOx emissions from MWCs within the OTC region. Specifically, the Report identified existing NOx reduction efforts undertaken at various MWCs, either voluntarily or in response to regulatory rule adoptions, with a specific focus on facilities located in Maryland and Virginia. The Report concludes that a NOx emission limit of 110ppmvd (24-hr avg) and 105ppmvd (rolling 30-day avg) is both appropriate and feasible for Large MWCs in the OTC.

The Report addresses Covanta's Low NOx (LN™) technology as implemented at the Covanta Fairfax (Lorton, VA), Covanta Alexandria (Alexandria, VA) and Montgomery County (Dickerson, MD) MWCs, along with references to the Hillsborough FL, Bristol, CT and Essex County NJ MWCs. Based on public sources of information related to these facilities, the Report concludes "information indicates that Covanta run facilities across a wide range of sizes and manufacturers, can be retrofitted with the proprietary Covanta LN™ technology and achieve significant [NOx] reductions". Please be aware that Covanta owns/operates several different combustor/grate technologies across our MWC fleet, and not all of them have been evaluated for LN™ engineering and/or commercial feasibility. As the owner of this proprietary technology, we consider each facility as a unique operation and have not arrived at a 'one-size-fits all' design with a single enforceable NOx emission limit.

We are presently evaluating NOx reduction technologies (including LN™) at select MWC facilities and can share the results of that effort with the OTC in conjunction with the local regulatory agencies. In the interim, we would welcome the opportunity to discuss our LN™ technology with you and your staff. Please feel free to contact me at 201-826-5609.

Sincerely,



Brian Bahor, QEP

VP, Environmental Permitting and Sustainability