

November 12, 2023

Mr. Patrick Riley
Oklahoma Department of Environmental Quality
Land Protection Division
PO Box 1677
Oklahoma City, OK 73101-1677

Subject: Solid Waste Permit Modification Application
Covanta Tulsa Renewable Energy LLC
2122 S. Yukon Avenue, Tulsa, OK 74107
Permit No. 3572033

Dear Mr. Riley:

Attached please find Covanta's application for a modification to its above-referenced Solid Waste permit to allow the facility to process a limited scope and quantity of Regulated Medical Waste (RMW). While Covanta believes the proposed modification should be processed under Tier II permitting requirements, Covanta is moving forward with a Tier III application pursuant to consultation with ODEQ representatives.

The proposed addition of RMW to the list of wastes that can be processed at the Tulsa Facility will provide many benefits to biomedical waste generators and the local community. These benefits are described below as follows:

Capacity: The proposed Covanta Tulsa program can provide much-needed RMW disposal capacity for Oklahoma healthcare facilities and the surrounding states. Currently, there is no thermal treatment option for "incinerate only" medical waste within the State of Oklahoma. All "incinerate only" medical waste generated by Oklahoma regional healthcare facilities and other industries must have their waste transported hundreds of miles across multiple state lines to incineration facilities.

Having an effective RMW processing program at Covanta's Tulsa Facility would reduce disposal costs and risks for Oklahoma healthcare facilities by eliminating the need to transport their medical waste long distances to disposal facilities which frequently experience service interruptions. Generally, this would also reduce risk to the general public as RMW material would be transported fewer miles with less opportunity for accident during transit.

Safety: Covanta has the highest level of safety in the RMW industry. Its facilities are part of OSHA's Voluntary Protection Program (VPP) and have standard operating and safety procedures specific to receiving and processing RMW.

Reliability: By having three (3) MWC units at the Tulsa Facility permitted to combust RMW with MSW, the proposed project will provide consistent capacity to the marketplace by minimizing the risk of service interruptions that are common at medical waste incinerators in today's RMW waste market.

Sustainability: Covanta is the only company in the United States that can supply steam and electricity and recycle metal from the processing of RMW. The implementation of the proposed project will result in a reduction in greenhouse gas emissions from the long-haul transport of RMW to more distant locations.

Host Community benefits: The proposed Covanta Tulsa RMW program will provide a benefit to the "host community" from the proposed expansion of operations at the Facility. The City of Tulsa supports this proposed project.

Experience: Covanta has over 30 years of experience and knowledge processing RMW at three (3) of its existing Waste to Energy (WTE) facilities – knowledge that would be utilized in the proposed program at the Tulsa Facility.

A Draft of the Notice of Filing is included for your review in Appendix L of the Application. Please provide contact information for the permitting contact at ODEQ as well as any comments on the draft notice. Covanta plans to publish the Notice in the *Tulsa World* as soon as possible.

We look forward to your review of the application.

Yours,

Terrence Byrne
Facility Manager