



Powering Today. Protecting Tomorrow.

**Covanta Essex Company**

183 Raymond Boulevard

Newark, NJ 07105

Tel: 973-344-0900

Fax: 973-344-4999

January 7, 2021

Mr. Jeffrey Meyer  
Manager  
Division of Air Enforcement  
Bureau of Air Compliance and Enforcement – Northern  
7 Ridgedale Avenue  
Cedar Knolls, NJ 07927

Subject: Conditions (a) and (c) of Phase I, Section B of Administrative Consent Order EA ID# 200001-07736

Mr. Meyer;

The Administrative Consent Order (“ACO”) entered into by Covanta Essex Company (“Essex”) with the Commissioner of the New Jersey Department of Environmental Protection (“Department”) included conditions (a) and (c) of Phase I of Section B Compliance Schedule as follows:

- a) Within thirty (30) calendar days of the effective date of this ACO COVANTA ESSEX COMPANY (“COVANTA”) shall hire an independent public relations consultant or other similarly qualified consultant to develop a formal public outreach program and/or review and supplement as necessary, COVANTA’s existing program if one either formally or informally exists. A plan, detailing the program, shall be developed and shall include, but not be limited to, procedures to provide timely updates on any operational upsets that result in permit excursions, periodic notifications to local community groups, including electronic and other agreed to forms of communication and the establishment of a website link. COVANTA shall reach out to local community groups to determine notification schedules and deliverables for purposes of planning and program development.
- c) Within ninety (90) calendar days of the effective date of this ACO, COVANTA shall complete and submit the plan to the Department for comment. Within fourteen (14) calendar days after addressing any modifications to the plan, COVANTA shall initiate the planned program.

The attached Community Outreach Plan and report from Mercury Public Affairs is provided to the Department to fulfill this condition of the ACO.


If you have any questions or need any additional information please contact Patricia Earls of my staff at 973-817-7322 or [pearls@covanta.com](mailto:pearls@covanta.com).

Sincerely,

A handwritten signature in black ink, appearing to read "David Blackmore". The signature is fluid and cursive, with a large initial "D" and "B".

David Blackmore  
Facility Manager

*"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this letter and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate, or incomplete information."*

  
\_\_\_\_\_  
David Blackmore  
Facility Manager

1/2/21  
\_\_\_\_\_  
Date

**TO:** Covanta Essex

**FROM:** Mo Butler, Mercury Public Affairs

**DATE:** January 4, 2021

**SUBJECT:** Covanta Essex Communications & Community Engagement Plan

---

## Overview

Mercury is pleased to be the lead public affairs consultant for Covanta Essex, which has drawn local attention recently stemming from opacity incidents referred to as “Purple Plumes,” which have been a catalyst for increased public scrutiny.

Covanta Essex engaged Mercury to strengthen their overall communications outreach efforts and to further support the growing environmental justice platform that exists in Newark. In order to do this and to ensure transparency between the company and the local community, we have advised Covanta Essex on a targeted community relations campaign that will equip the company with a variety of tools and opportunities to engage the community in an effective manner.

## Strategic Approach to Long-Term Community Relations

Covanta Essex has long played a vital role in reducing the need for landfills, enhancing recycling, creating 24/7 electricity, and reducing greenhouse gases – all while responsibly managing nearly 1 million tons of waste generated annually by hundreds of thousands of households in the region.

Despite these benefits, Covanta has long recognized the need to increase overall transparency in its operations and remain proactive in its community outreach efforts to build trust with its neighbors. Among those efforts have been offering in-person tours, working with media, and engaging with community stakeholders where possible on “Open House” events to address questions and concerns from residents.

The company has a number of local initiatives, including Prescription for Safety (Rx4Safety) to dispose of excess medications to divert from wastewater supplies and landfills, free electronics collections located within the community for residents, as well as city-wide cleanup events organized by Slam Dunk the Junk, an organization that aims to highlight the health concerns caused by littering. Covanta is also a good corporate neighbor, sponsoring a number of educational and non-profit activities in Newark.

As far as transparency, members of the public can easily locate annual facility performance fact sheets, in easy-to-read formats on the Covanta website. These sheets break down key air quality metrics and highlight the sustainable approach the company takes to dispose of municipal solid waste and turn it into enough electricity for 46,000 homes annually. The facility’s outreach plan also now includes internal protocols for timely publication of operational incidents to better inform the community in the future.

Mercury's goal heading into this engagement was to ensure Covanta Essex had a clear understanding of best practices for community engagement. We believe its outreach plan realistically addresses these challenges. Among the additional recommendations that have been suggested and incorporated into the plan include:

- Making digital content, such as the facility Fact Sheets, available in Spanish and Portuguese, to cater to the local immigrant community.
- Initiating a bi-annual email newsletter, that provides relevant notifications, information and job opportunities pertaining to Covanta Essex, while exploring a tri-lingual one-time mailing and potential digital ads to promote the email list sign-up.
- Identifying additional non-profit organizations and higher-ed institutions that we view as potential partners for the company - such organizations as the Greater Newark Conservancy, NAN Tech World, Rutgers Newark, and Essex County College – as well as local sport programs like the Roberto Clemente Little League and the Ironbound Soccer Club.
- The company should also offer employment opportunities through the Mayor's Office of Employment and Training Program – a program aimed at training and hiring Newark residents.

## **Conclusion:**

It's been a pleasure working with your team on creating and implementing a community engagement strategy to help Covanta Essex break down barriers and build trust in the community. Mercury's goal is to ensure Covanta Essex is well positioned in the event of a crisis by creating channels that the community can utilize to obtain timely information. Simultaneously, we aim to reinforce Covanta Essex's commitment to environmental justice by supporting and working with local organizations and non-profits.

## Essex Communications & Community Engagement Plan

---



## Contents

|            |                                                         |           |
|------------|---------------------------------------------------------|-----------|
| <b>1.0</b> | <b>Background</b> .....                                 | <b>3</b>  |
| <b>2.0</b> | <b>Objectives</b> .....                                 | <b>3</b>  |
| <b>3.0</b> | <b>Methods</b> .....                                    | <b>4</b>  |
| <b>3.1</b> | <b>Website</b> .....                                    | <b>4</b>  |
| <b>3.2</b> | <b>Community Newsletters and Alerts</b> .....           | <b>5</b>  |
| <b>3.3</b> | <b>Media Relations And Facility Tours</b> .....         | <b>5</b>  |
| <b>3.4</b> | <b>Social Media</b> .....                               | <b>5</b>  |
| <b>3.5</b> | <b>Incident Communication Protocols</b> .....           | <b>5</b>  |
| <b>4.0</b> | <b>Community Engagement</b> .....                       | <b>6</b>  |
| <b>4.1</b> | <b>Ongoing Engagement</b> .....                         | <b>7</b>  |
| <b>4.2</b> | <b>Environmental Justice</b> .....                      | <b>8</b>  |
| <b>5.0</b> | <b>Public Forums</b> .....                              | <b>8</b>  |
| <b>5.1</b> | <b>Open Meetings</b> .....                              | <b>9</b>  |
| <b>5.2</b> | <b>Collaborative Community Organization</b> .....       | <b>9</b>  |
| <b>6.0</b> | <b>Potential Planned Opportunities And Events</b> ..... | <b>10</b> |
| <b>7.0</b> | <b>Summary</b> .....                                    | <b>10</b> |

---

## 1.0 Background

---

The Essex County Resource Recovery Facility (RRF), referred to as 'Covanta Essex' in this document, is a Waste-to-Energy (WTE) facility in Newark, NJ. Covanta Essex uses municipal, commercial and non-hazardous industrial waste as fuel to generate electricity. On an annual basis, the facility provides sustainable disposal of up to 985,500 tons of municipal solid waste and generates enough electricity to meet the needs of 46,000 homes.

Covanta Essex has drawn criticism locally. This is in part due to opacity incidents, including a number of recent events, referred to as 'Purple Plumes'. During these events, gas with a purple-pink hue was discharged from the stack, the result of the combustion of waste containing iodine. Iodine is used in various industrial processes and is likewise found in a number of different waste streams. On all these occasions, the amount of iodine present in the discharged gas was well below levels considered representative of a respiratory irritant. Covanta takes this issue extremely seriously and has since rectified it implementing a two-step process to foremost, prevent iodized waste from being combusted, and then to identify potential future mitigation methods as a necessary precaution.



The events and questions raised as a result remain reminders of the necessity to engage the community in new ways to ensure public awareness and understanding for the residents of the City of Newark and Essex County.

The overarching goal of Covanta's renewed communications and outreach efforts is to ensure transparency by creating and maintaining channels for effective communication regarding any changes in daily operations.

---

## 2.0 Objectives

---

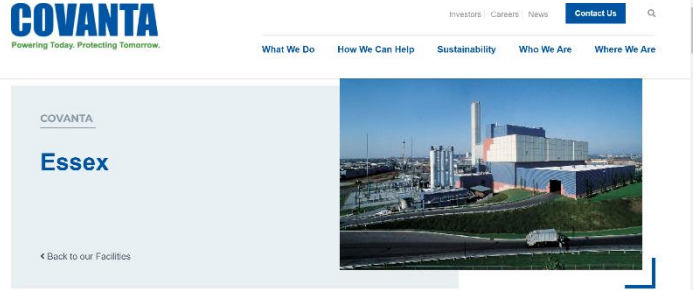
1. To provide outlets for community members to obtain timely information and updates pertaining to the facility's day-to-day operations, including regarding potential issues of concern.
2. To further support Newark's existing and growing environmental justice platform in a holistic fashion and to educate residents on Covanta's commitments and investments in this area.



## 3.0 Methods

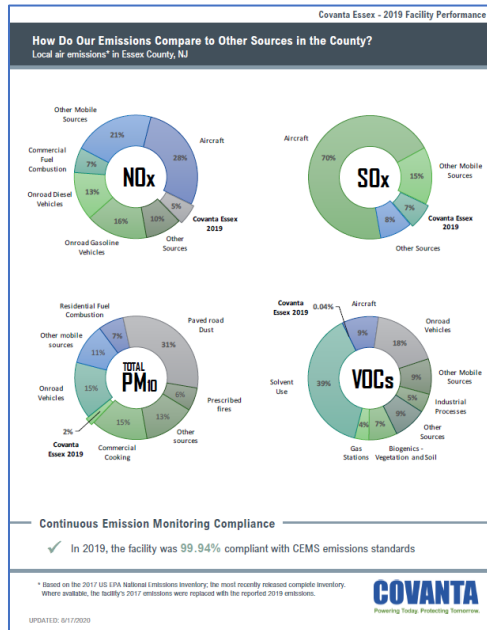
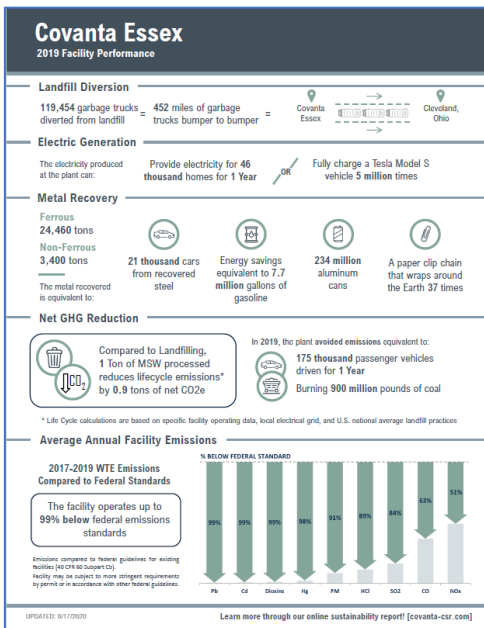
### 3.1 Website

The Covanta Essex webpage ([covanta.com/essex](http://covanta.com/essex)) – will provide timely, helpful and easy-to-understand information. Included are operations and community engagement updates, career opportunities, environmental/emissions performance and other corporate information. In addition, video and other interactive elements will continue to be incorporated for a clear and concise overview of the WTE process, its benefits and many contributions to the Newark community and beyond. We also plan to make portions of the webpage content available in Spanish and Portuguese.



To increase overall transparency, interested stakeholders will soon gain access to continuous emissions monitoring data from Covanta Essex. Additionally, the most up-to-date facility fact sheet will be distributed and linked regularly in external communication to provide interested community stakeholders with fact-based information.

The 2019 sheet can be view [here](#) and is below for reference:



### **3.2 Community Newsletters and Alerts**

A newsletter, Covanta Essex News, will be created and circulated no less than twice a year to provide community stakeholders, residents and local businesses with relevant, timely information pertaining to Covanta Essex. Content, which will be available in both Spanish and Portuguese in addition to English, will include updates relating to facility operations, job opportunities, community activities and answers to frequently asked questions.

Community members will be encouraged to sign up for the newsletter by adding themselves to the Covanta Essex mailing list at [www.covanta.com/essex](http://www.covanta.com/essex). Upon doing so, they will be sent notifications of any incidents, in addition to regular updates related to ongoing facility activities. We will also evaluate the viability and community interest in mobile phone text-based alerts.

### **3.3 Media Relations and Facility Tours**

Covanta will regularly engage with the media to encourage community awareness and deliver updates on operations and performance at Covanta Essex. The media will serve as an effective intermediary between Covanta Essex and all interested stakeholders.

In-person tours remain important for educating reporters, local officials, school groups, and all other interested community stakeholders on the facility and WTE technology – and will be reinstated after pandemic restrictions are lifted. Likewise, virtual presentations will also remain available to interested groups. Press releases will be circulated to local and regional media on a periodic basis to inform residents of regular activities happening at the facility.

### **3.4 Social Media**

Covanta Essex will establish a Twitter profile (@CovantaEssex) to provide updates on facility incidents, community events, tours and any other relevant news about the facility. Twitter provides another opportunity to engage with members of the community that may or may not receive information from the other vehicles previously outlined.

### **3.5 Incident Communication Protocols**

The following protocol will be enacted to ensure information regarding facility incidents, events and operations is promptly and transparently communicated to stakeholders. The methods outlined above will be used to disseminate the information.

1. Facility Operations staff alert Facility Management personnel about a given situation

2. Facility Management, Asset Management and/or Environmental staff to gather facts and work with Corporate Communications to disseminate information to stakeholders via any/all methods described above
3. Asset Manager will also reach out directly with phone calls and/or text messages to established community groups, e.g., ICC
4. Steps 1-3 are repeated on a continuous basis as appropriate

### **3.6 Advertising**

Several local advertising tools will be used to accompany the aforementioned methods with the expressed purpose to:

- a. Bolster the community mailing list
- b. Promote Open Meetings (described below in Section 5), and
- c. Generally increase reach of above described methods for disseminating important information regarding facility operations

Toward these ends, we are also investigating a one-time mailing that will be sent to all residences within the post code 07105 area. The mailing will be trilingual (English, Spanish, and Portuguese) and will include basic information about the facility as well as encourage community members to sign up for the mailing list and to follow the facility on social media.

---

## **4.0 Community Engagement**

---

Covanta is committed to being an active and supportive community member. We have a responsibility to give back by investing in Newark, providing jobs for residents and supporting educational, environmental, social and economic developmental opportunities as appropriate. Nearly a quarter of Covanta Essex employees live within five miles of the facility – more than half live within ten miles (see chart below).

## Covanta Essex Workforce Proximity to Facility



### 4.1 Local Engagement

We currently engage directly with the community through several initiatives. One example is our Prescription for Safety (Rx4Safety) program which facilitates the take-back of unused, unwanted or otherwise disposable medications. By utilizing the waste-to-energy facility for disposal of this material, we are protecting the environment from medications being flushed, washed down the drain, or landfilled, as well as providing an important preventative step in combating the drug abuse.

Another example is our involvement in city-wide cleanup events organized by Slam Dunk the Junk, an organization dedicated to fighting littering and the environmental and health concerns caused by littering. In addition to these two examples, we are active or plan to support the following local organizations.

- Boys and Girls Club of Newark
- Ironbound Ambulance Squad donations
- Salvation Army
- Goodwill
- New York Red Bulls
- New Jersey Clean Communities Council
- Ironbound Business Improvement District
- City of Newark
- Dept. of Public Works (DPW)
- Turtleback Zoo
- NJIT Women in Engineering and & Technology Initiatives (FEMME) Program
- Greater Newark Conservancy
- Montclair State Sustainability Seminar Series
- St. Benedict's Prep
- Free E-waste collections located within the city of Newark
- NJ Audubon
- Sustainable Jersey
- Sustainable Jersey for Schools

## 4.2 Environmental Justice

Covanta has long-been committed to environmental justice and reducing environmental impacts from the company's operations, turning this conviction into action with the creation and implementation of our [Community Outreach and Environmental Justice Policy](#) in 2011.

Our commitment to environmental justice is manifest foremost in superior environmental performance for the Newark community. The recent addition of a baghouse to existing emissions controls, an investment of more than \$90 million, has reduced emissions by up to 90 percent.



Beyond the facility's operational performance, a more proactive approach will be taken in developing ongoing and communicative relationships with local stakeholders within this same arena, potentially including organizations such as:

- Ironbound Community Corp. (ICC)
- Ironbound Business District
- NJ Environmental Justice Alliance (NJEJA)
- Greater Newark Conservancy
- Newark Sustainability Director
- NAACP Newark Chapter
- Montclair Chapter, National Council of Negro Women (NCNW)
- Newark Community Collaborative Board (NCCB)
- Hawthorne Avenue Farm

This list is not considered exhaustive. All stakeholders with similar characteristics to the above-mentioned groups may also be included toward fostering an inclusive and productive style of engagement. Shared characteristics include being considered local entities with interests in improving the Newark and/or Ironbound community. Identifying these emerging stakeholders will be an iterative process.

Covanta will continue to proactively promote local employment opportunities and target local suppliers of materials, goods and services. Currently, the workforce at Covanta Essex is made up of more than 50 percent local residents who live within ten miles of the facility. Covanta remains committed to maintaining, developing and seeking to draw its workforce from the local community whenever possible.

---

## 5.0 Public Forums

---

Sponsorships and general community involvement are an important component of our approach to community outreach in Newark. For example, increasing contributions to

local youth sports organizations including Roberto Clemente Little League, and Ironbound Soccer Club, is another route being explored for potential direct engagement.

Still, these methods have yet to adequately provide a platform for concerned members of the Newark community to speak directly with facility employees and management. Methods described further below in this section will be used to generate more direct routes of communication with stakeholders and community members. Target groups for engagement through public forums may include:

- Earthjustice
- Ironbound Community Corp. (ICC)
- NJ Environmental Justice Association (NJEJA)
- Ironbound Business District
- The Baraka Administration
- Assemblywoman Speight
- Senator Booker
- Senator Ruiz
- Assemblywoman Pintor-Marin
- Newark City Council
- County Executive DiVincenzo
- Newark Sustainability Dept.
- Newark Public Schools
- Newark Downtown District
- NAACP (Newark Branch)
- DEP Commissioner
- DEP Deputy Commissioner for Environ. Justice & Equity
- All potentially relevant and/or interested classes/departments at local educational institutions
- Dept. of Sanitation (NY); Bureau of Recycling & Sustainability
- NAN Newark Tech World

## 5.1 Open Meetings

Covanta is committed to maintaining effective communication with stakeholders and providing opportunities for people to ask questions, share concerns or learn more about what we do. In the past, the facility held Open House events that were well advertised but sparsely attended. In 2019, we opted to hold an Open Meeting at a local restaurant in the Ironbound with the hopes of encouraging more community participation. The 2019 Open Meeting was well attended and in light of that success, this format will be maintained with the meetings taking place on a bi-annual basis.

Notably, the 2020 Open Meeting was held virtually via Zoom on December 16, 2020 in consideration of restrictions and safety measures in place to mitigate the spread of COVID-19. The meeting included a presentation and a virtual tour of the facility, with opportunities for stakeholders to ask questions and engage with facility and company representatives. Continued use of virtual tours and other virtual events will be evaluated into the future and quite possibly, will remain a prominent vehicle for engagement going forward. Although the event was virtual, we supported the same local restaurant by offering gifts cards to those who participated in the online event.

## 5.2 Collaborative Community Organization

In Camden, where Covanta operates another Waste-to-Energy facility, the company participates in the Camden Collaborative Initiative (CCI). The CCI is an organization dedicated to fostering cooperation among stakeholders in achieving meaningful gains for Camden's community. In Newark, we are considering inviting key local stakeholders to establish/join a similar panel for the Newark community, or perhaps seeking membership in the Newark Anchor Collaborative (NAC), an initiative of the Newark Alliance.

The primary objectives of establishing or joining an existing collaborative community organization would be to:

1. Break down/markedly reduce existing barriers between the community and industry.
2. Respond to issues of concerns raised regarding our activities at Covanta Essex and therefore provide a space to develop trust.
3. Identify opportunities where industry can support important community projects and maximize the economic benefits and supply chain opportunities within and for Newark.

---

## **6.0 Potential Planned Opportunities and Events**

---

The following are potential opportunities for positive engagement with local stakeholders and community members separate from established communications protocols for operational notifications (e.g., opacity incidents). Ideas will be captured and screened for feasibility and community relevance. These may include:

- Establishment of a collaborative community organization
- Facility beautification project(s)
- Media tour(s)
- Facility safety and environmental milestone(s)

These and other activities to be identified would serve as means for distributing factual information about the facility, which is less to do with day-to-day operations and any incident that may occur. Efforts in this area would be toward fostering a more inclusive environment at the facility as well as more holistic means for providing knowledge regarding the benefits of waste-to-energy for Newark.

---

## **7.0 Summary**

---

This plan will be implemented to directly improve communicative abilities of Covanta Essex with the community, and will be reviewed and updated as needed. Specifically, details regarding all matters related to day-to-day operations and operational upsets that could potentially result in a permit excursion, will be communicated using methods described in detail in the above sections. At all times, emphasis will be placed on

providing members of the Newark community with timely and factual updates related to the facility. Furthermore, enhanced communication toward fostering an improved relationship with the Newark community will be hereby made a point of attention for Covanta, and may include efforts not already made by way of existing partnerships and/or contributions to local groups.