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July 19, 2021

Mr. Jeffrey Meyer
Manager
Division of Air Enforcement
Bureau of Air Compliance and Enforcement – Northern
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Subject: Covanta Essex Communications & Community Engagement Plan; Newark, Essex County Program ACO EA ID#200001-07736 – Response to NJDEP comments

Mr. Meyer;

On June 18, 2021, Covanta Essex Company (Covanta) received comments from the NJDEP Division of Air Compliance and Enforcement on the Covanta Essex Communications & Community Engagement Plan (Plan) dated January 4, 2021 submitted by Covanta pursuant to ACO NEA200001-07736.


Attached to this letter are the Covanta responses to each of the comments and recommendations from NJDEP. Also attached is the updated Plan which has been revised as noted in the attached responses.

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.

Sincerely,

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

7/19/21
Date

Covanta Essex Company Response to NJDEP Comments on the Essex Communications & Community Engagement Plan

1.0 Introduction

On June 18, 2021, Covanta Essex Company (Covanta Essex) received comments from the NJDEP Division of Air Compliance and Enforcement (Department) on the Covanta Essex Communications & Community Engagement Plan (Plan) that was submitted by Covanta Essex Company on January 7, 2021 pursuant to the requirements of the Administrative Consent Order (ACO) NEA200001-07736.

2.0 Comment #1

2.1 NJDEP Comment

As specified in Phase 1: a) of the ACO, Covanta shall reach out to local community groups to determine notification and deliverables for purposes of planning and program development. This action shall be incorporated into the Covanta Essex Communications & Community Engagement Plan. To date there has been no indication that Covanta has complied with this requirement. Please confirm.

2.2 Covanta Response to Comment

Mr. Jack Bernardino, Asset Manager for Covanta Essex, contacted Ms. Maria Lopez-Nunez of the Ironbound Community Corporation (ICC) by both email and phone to inquire as to the type and form of notifications that they would be interested in receiving from Covanta Essex. Ms. Lopez-Nunez agreed that it would be acceptable for Mr. Bernardino to contact her via cell phone, text, or email regarding any events at Covanta Essex. For urgent matters, she will receive a call and/or text with a followup email. For routine matters, the notification may be by email. Since that time, both text and email notifications were provided for the emission exceedance events on January 9, 2021 (1-hr SO₂), January 26, 2021 (4-hr CO), February 3, 2021 (4-hr CO), April 4, 2021 (4-hr CO), and May 11, 2021 (1-hr SO₂). Also, notifications were provided by text to inform the ICC of the refuse crane replacement project that began in September 2020 and a small fire on the tipping floor that resulted in the Newark Fire Department arriving on site after the fire was extinguished by Covanta operators on June 11, 2021. This notification procedure for the ICC is now included in the revised Plan under Section 3.5.

Additionally, Mr. Bernardino reached out on multiple occasions to the New Jersey Environmental Justice Alliance to determine if they would like to also receive the same notifications, however, no response has been received to date.

Finally, post cards announcing the availability of daily continuous emission monitoring (CEM) data for the Covanta Essex facility on its website will be mailed out next week to a radius of neighbors to the Covanta Essex facility in the Ironbound area in Newark. The post cards will also include additional information on how to sign up to receive notifications on plant events, the bi-annual newsletter, and to request a tour of the facility.

3.0 Comment #2

3.1 NJDEP Comment

Comments to be included into Section 1.0 (Background) of Covanta Essex's Communications & Community Engagement Plan:

- 1) Under Paragraph 2 of Section 1.0, the following language should be deleted: "On all these occasions, the amount of iodine present in the discharged gas was well below levels considered representative of a respiratory irritant." and be replaced with: "Covanta in conjunction with its environmental consultant and the New Jersey Department of Environmental Protection is analyzing the discharged gas to address community public health and environmental concerns regarding any potential impacts from the iodine." The revised language reflects the ongoing process.

3.2 Covanta Response to Comment

Paragraph 2 of Section 1.0 of the Plan has been revised as follows:

Covanta Essex has drawn criticism locally, due in part 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. Covanta, in conjunction with its environmental consultant and the New Jersey Department of Environmental Protection, is analyzing the discharged gas to address community public health and environmental concerns regarding any potential impacts from the iodine. Covanta takes this issue extremely seriously and has rectified it by implementing a two-step process: (1) prevent iodized waste from being combusted by preventing its delivery through review of generators who use iodine in manufacturing process and (2) communication with generators and waste haulers to ensure that they are aware of the potential issues with this type of waste if delivered to the facility.

4.0 Comment #3

4.1 NJDEP Comment

Comments to be included into Section 3.0 (Methods) of Covanta Essex's Communications & Community Engagement Plan:

- 1) Under Paragraph 3 under Section 3.1 (Website), the Plan indicates that Covanta Essex will be providing the most up-to-date facility fact sheet to be distributed and linked regularly in external communication to provide interested community stakeholders with fact-based information. The fact sheet should be updated to include Covanta Essex's annual plant emissions compared with the Title V Operating Permit emission limits for the same contaminants provided in the fact sheet.

4.2 Covanta Response to Comment

The facility fact sheet is currently being updated to include the average annual facility performance between 2018 and 2020. The fact sheet includes a comparison of Covanta Essex's average annual plant emissions between 2018 and 2020 compared to the most stringent of the Title V Operating Permit emission limits expressed as concentration limits. The link to the performance sheet currently included on the facility website will be updated with the new sheet once it is completed. The updated fact sheet will also be included in the bi-annual newsletter that will be distributed to the contacts included in the Covanta Essex contact database or List Serve.

5.0 Comment #4

5.1 NJDEP Comment

To increase overall transparency, include the following additional resources to be posted on Covanta Essex's Website (www.covanta.com/essex):

- 1) A link to access both the current Title V Operating Permit and Solid Waste Permit. Subsequent renewed or modified Title V Operating Permits and Solid Waste Permits should also be added to the link.
- 2) A link to access Enforcement Documents issued since full execution of Administrative Consent Order (ACO) NEA200001 dated October 9, 2020. Documents shall include any agency issued action such as Settlement Agreements (NEAs) or (ACOs), Enforcement Actions (PEAs) or (NOVs). The ACO Agreement (NEA200001) should be the first Enforcement Action Document listed under this link.
- 3) A link to access a list of the Trenton Dispatch Case Numbers for any self-reported violations that have occurred on or after October 9, 2020.

5.2 Covanta Response to Comment

The following are the Covanta responses to items 1 through 3 above:

- 1) A link has now been added to the Covanta Essex facility website which allows public access to the current Title V Operating Permit (BOP190001 amended on October 18, 2019) and the current Solid Waste Operating Permit (RRF190001 modified on October 21, 2019). The link for the page is: www.covanta.com/njdep-submittals.
- 2) A link to the final ACO NEA200001 dated October 9, 2020 has now been added to the facility website in the section where links to NJDEP submittals pursuant to the ACO are located. However, for all other Settlement Agreements and Enforcement Actions, instead of including a link to each document, Covanta has included a link to both the NJDEP DataMiner database and the US EPA Enforcement and Compliance History Online (ECHO) database. As these are actively managed databases by NJDEP and USEPA, respectively, this will ensure that access to the most current enforcement documents is provided. The link is located on the same page as the link for the facility permits listed above.

- 3) While we appreciate and understand the interest in greater transparency, we believe that a link to case numbers for self-reported violations may be counterproductive. Dissemination of open case numbers, where the details of the potential violation have not been fully adjudicated, risks publishing incomplete and potentially inaccurate information to the public. This reflects the agency's well-documented process for managing open cases. Accordingly, case information would be released if and when an agency issued action is finalized (e.g. settlement agreement, enforcement action, or notice of violation). An exception to this rule, however, is appropriate for any matter that is, or has the potential to present, an imminent risk to human health or the environment. Therefore, this link has not been added to the website.

6.0 Comment #5

6.1 NJDEP Comment

The Department recommends the following regarding the notifications that are sent to the Community Stakeholders:

- 1) It is not clear when reviewing the Plan which type of notification will be sent to the Community Stakeholders once they sign up on Covanta's Website for these notifications. Section 3.2 under "Community Newsletters and Alerts" mentions notifications by cell phone and possibly e-mail since the Community Stakeholders/Groups will be signing up for the notifications on Covanta's website, while section 3.4 mentions notifications by Twitter. The Department recommends that the Community Stakeholders/Groups that sign up for these notifications, be able to choose the method of communication (text message, email or telephone recording) they would prefer. The website should include check boxes that list what type of notification the individual would like their notifications sent to them on (such as e-mail or text message to their phone, as examples).
- 2) Covanta's Website shall provide the Community Stakeholder have options to receive notifications in English, Portuguese, or Spanish. Covanta Essex shall provide a Hotline telephone number for individuals who may not have access to social media (phones, computers), to contact Covanta Essex to register for notifications. Covanta Essex shall include this Hotline Number in the bi-annual newsletter.
- 3) Covanta Essex shall implement a "List Serve" for interested parties to register for updates and notices. Covanta Essex shall maintain a list of all the e-mail addresses of the Community Stakeholders on this "List Serve."
- 4) Covanta Essex should e-mail or mail out the bi-annual newsletters to multiple individuals who work at any of the Community Organizations listed under Section 4.2 "Environmental Justice" listed in this Plan.
- 5) Covanta Essex shall within 30-days from the final approval of the plan send out mass mailing newsletters soliciting Community Stakeholders to sign up on Covanta's website to start receiving notifications.
- 6) Within 60 days from the date of the final approval of the Plan by the Department Covanta shall post a copy of the final Plan to the Covanta Essex Website in English, Spanish and Portuguese.

6.2 Covanta Response to Comment

- 1) The facility website will be modified so that when community stakeholders sign up for notifications, they will have the option of choosing to sign up to receive the newsletter and/or notifications of facility incidents or announcements by email. For those that do not have access to email, a Hotline will be available 24 hours a day to obtain the latest information on facility incidents or announcements. This is the only feasible option available for those without access to email. The Hotline will have the capability to speak to residents in English, Spanish, and Portuguese. The Plan has been updated to clarify the options available. As stated in the Plan, Twitter is available as an option for those who choose to use it. The telephone number for the Hotline will be listed on the facility website.
- 2) The facility website will be modified to include a toggle button at the top of the page which will be able to translate the page contents to Spanish or Portuguese. Upon request, notifications will also be distributed in Spanish or Portuguese. Additionally, as stated above, a Hotline number will be established for residents to call 24 hours a day to obtain the latest information on facility operations. The telephone number for the Hotline will be included in the bi-annual newsletter.
- 3) Covanta Essex already has a means for community stakeholders to join the facility mailing list by providing their email address on the facility website, thus allowing us to maintain a database of email contacts. We believe this satisfies the requirement to have a “List Serve”.
- 4) Covanta Essex plans to include individuals that work for or belong to the Community Organizations listed under Section 4.2 of the Plan as part of the distribution of the bi-annual newsletter. Their contact information will be included with the List Serve database referenced above.
- 5) As stated in the response under Section 2.2 above, post cards are in the process of being prepared announcing the posting of daily continuous emission monitoring (CEM) data for the Covanta Essex facility on its website along with additional information on how to sign up to receive notifications on plant status, the bi-annual newsletter, and to request a tour of the facility. The post cards are expected to be mailed out next week to a radius of neighbors to the Covanta Essex facility in the Ironbound area in Newark. A separate newsletter will be sent out within 30-days from the final approval of the Plan to the current List Serve database contacts.
- 6) As requested, within 60 days from the date of the final approval of the Plan by the Department, Covanta will post a copy of the final Plan to the Covanta Essex Website in English, Spanish and Portuguese.

Essex Communications & Community Engagement Plan



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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, due in part 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. Covanta, in conjunction with its environmental consultant and the New Jersey Department of Environmental Protection, is analyzing the discharged gas to address community public health and environmental concerns regarding any potential impacts from the iodine.



Covanta takes this issue extremely seriously and has rectified it by implementing a two-step process: (1) prevent iodized waste from being combusted by preventing its delivery through review of generators who use iodine in manufacturing process and, (2) communication with generators and waste haulers to ensure that they are aware of the potential issues with this type of waste if delivered to the facility.

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.

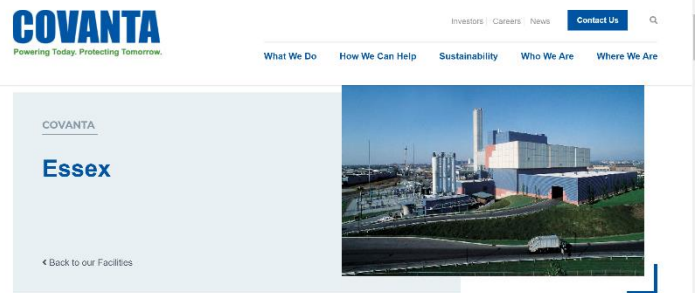
2.0 Objectives

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

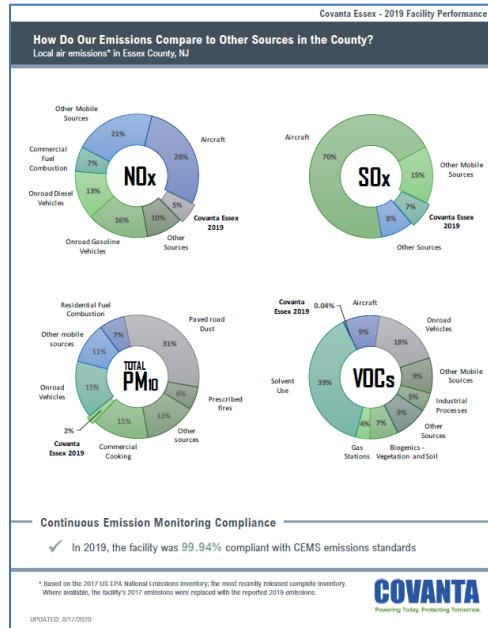
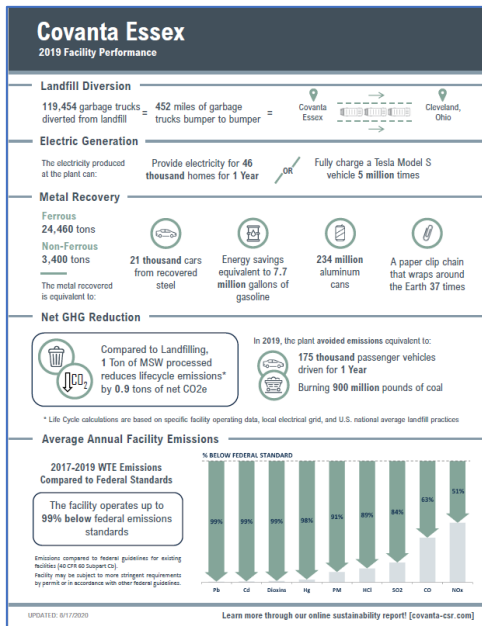
3.1 Website

The Covanta Essex webpage (www.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 are now able to gain access to continuous emissions monitoring data from Covanta Essex on the facility webpage referenced above. 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 by postal mail and email 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. The sign-up page will have multiple options for community members to choose to receive the newsletter and/or notifications of facility incidents or announcements. There is also a separate link available to sign up for a facility tour. Upon choosing to do so, they will be sent notifications by email of any incidents, in addition to regular updates related to ongoing facility activities. Based on Covanta’s evaluation of the viability and community interest in mobile phone text-based alerts, this option will not be available for the general public.

In addition, a Hotline will be available 24 hours a day for the public to obtain the latest information on facility incidents or announcements. The Hotline will have the capability to speak to residents in English, Spanish, and Portuguese. The telephone number for the Hotline will be listed on the facility website.

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 and emails to the Ironbound Community Corporation (ICC) and other established community groups that have requested notifications and an email notification will be sent to community members that have signed up to receive notifications of facility incidents
4. Additionally, a Hotline will be available for anyone from the community who does not have access to email to call for the latest information on an incident.
5. 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.