

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer
THRU: Jim Pennington
FROM: M. P. Halpin, P.E. *MH*
DATE: January 16, 2004
SUBJECT: Bay County RRF

Attached for approval and signature is a construction permit for a modification at the Bay County (Montenay Bay) Resource Recovery Facility, located in Panama City, Bay County. The permit is to replace the ESP on each of the two combustors with an acid gas scrubber and a fabric filter baghouse. Additional changes include the installation of lime storage and slaking equipment, a carbon storage and injection system, ID fans, new stacks and associated appurtenances.

The subject changes are intended as a means of complying with 40 CFR 60 Subpart BBBB (section 60.1535) and 62-204.800(8)(e), F.A.C. Such changes must be implemented in order to achieve facility compliance by November 15, 2005, and the applicant indicates that it will meet this schedule.

The draft permit is being issued without a BACT Review since the installation (as proposed) is intended to comply with more stringent Federal regulations, and should result in emission reductions.

What follows is an estimate of emission reductions based upon permitted values:

Pollutant	Existing (TPY)	After Retrofit (TPY)	TPY Reduction	% Reduction
Particulate Matter (PM)	59.13	22.6	36.53	61.8%
Sulfur Dioxide (SO ₂)	313.17	78.4	234.77	75.0%
Nitrogen Oxide (NO _x)	236.08	272.45	(36.37)	(15.4)%
Carbon Monoxide (CO)	812.93	243.91	569.02	70.0%
Lead (Pb)	0.88	0.41	0.43	48.9%
Mercury (Hg)	0.79	0.24	0.55	69.6%
Hydrogen Chloride (HCl)	540.05	39.37	500.68	92.7%

According to the consultant (CDM) the indicated increase in annual NO_x emissions is an artifact of the higher mass flow rate of combustion air. Although the permitted NO_x emission rate will decrease from 185 ppmvd to 170 ppmvd, the air flow will be higher in order to maintain the lower CO emission limit. The net effect is a slight increase (although less than "PSD significant") in the NO_x PTE. In order to assure that the unit "derating" is maintained, the PSD permit is being modified to incorporate a commensurate steam flow rate reduction.

I recommend your approval and signature.

Attachments

/mph

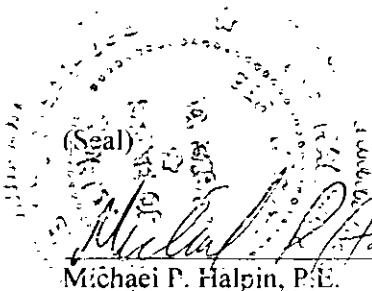
P.E. Certification Statement

Bay County Board of County Commissioners
Bay County (Montenay Bay) RRF
Bay County

DEP File No.: 0050031-009-AC
Facility ID No.: 0050031

Project: Air Construction Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions, provide reasonable assurance of compliance with applicable (PSD) provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise. (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

(Seal)

Michael P. Halpin, P.E.

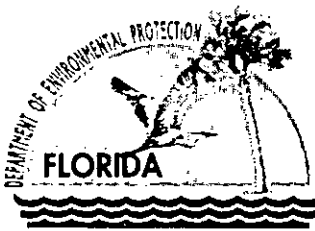
Registration Number: 31970

1/15/04
Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

January 16, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Clifton Windham
Director, Utilities Services Department
Bay County RRF
3410 Transmitter Road
Panama City, FL 32404

Re: DEP File No. 0050031-009-AC
Air Pollution Control Retrofit Project

Dear Mr. Windham:

Enclosed is one copy of the Draft air construction permit for the air pollution control project to be completed at 6510 Bay Line Drive, Panama City, Bay County. The Department's Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to James K. Pennington, P.E., Administrator at the above letterhead address. If you have any other questions, please contact Michael P. Halpin at 850/921-9519.

Sincerely,

Trina L. Vielhauer, Chief,
Bureau of Air Regulation

TV/mph

Enclosures

In the Matter of an
Application for Permit by:

Clifton Windham
Director, Utilities Services Department
3410 Transmitter Road
Panama City, FL 32404

DEP File No. 0050031-009-AC
Montenay Bay, LLC - Bay County RRF
Bay County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of Draft permit attached) for the proposed project, detailed in the application specified above and for the reasons stated below.

The applicant, Clifton Windham, Director, Utilities Services Department, Bay County, applied on December 19, 2003, to the Department for an air construction permit for its Bay County Resource Recovery Facility located at 6510 Bay Line Drive, Panama City, Bay County. The permit is to replace the ESP on each of the two combustors with a spray dry absorber and a fabric filter baghouse. Additional changes include the installation of lime storage and slaking equipment, a carbon storage and injection system, ID fans, stacks and associated appurtenances. The subject changes are required in order to comply with 40 CFR 60 Subpart BBBB and 62-204.800(8)(e), F.A.C.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to install the subject equipment at the existing facility.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.


The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The

name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

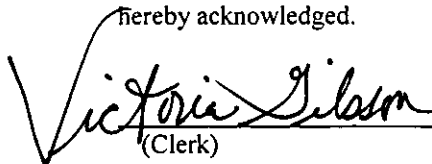
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/16/04 to the person(s) listed:

- Mr. Clifton Windham, Director, Utilities Services Department *
- Mr. Marc Wallace, Air Quality Scientist, CDM *
- Mr. Anthony Lore, P.E., CDM *
- Mr. Chalmous Beecham, Montenay Bay, LLC
- Bay County Board of County Commissioners
- Ms. Sandra Veazey, NWD-DEP
- Mr. Gregg Worley, EPA
- Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

1/16/2004
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0050031-009-AC

Montenay Bay RRF
Panama City, Bay County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Bay County Board of County Commissioners, for the Bay County (Montenay Bay) RRF located at 6510 Bay Line Drive, Panama City, Bay County. The permit is to replace the ESP on each of the two existing combustors with a spray dry absorber and a fabric filter baghouse. Additional changes include the installation of lime storage and slaking equipment, a carbon storage and injection system, ID fans, stacks and associated appurtenances. The subject changes are intended as a means of complying with 40 CFR 60 Subpart BBBB and 62-204.800(8)(e), F.A.C.

A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's mailing address is: 3410 Transmitter Road, Panama City, FL 32404. After the required improvements are made, total emissions of pollutants will not exceed the following emission rates per combustor:

Pollutant	Emission limit	Ton Per Year (TPY)
CO	250 ppmvd @ 7% O ₂	97.2
HF	0.15 lb/hr	0.657
Be	0.000005 lb/hr	0.000022
HCl	31 ppmvd @ 7% O ₂	15.7
Hg	0.070 mg/dscm @ 7% O ₂ or 80% reduction	0.1185
NO _x	170 ppmvd @ 7% O ₂	108.57
Cd	0.040 mg/dscm @ 7% O ₂	0.015
Pb	490 ug/dscm @ 7%O ₂	0.165
SAM	1.5 lb/hr	6.57
SO ₂	31 ppmvd @ 7%O ₂ or 75% reduction	39.2
PM	27 mg/dscm @ 7% O ₂	9.01
PM ₁₀	27 mg/dscm @ 7% O ₂	9.01
Dioxins	30 ng/dscm @ 7% O ₂	0.000026
VOC	7.1 lb/hr	31.1
Opacity	10% - 6 minute average	NA

An air quality impact analysis was not conducted since emissions of affected pollutants will either decrease below existing (permitted) values or have increases below the pertinent significance thresholds.

The Department will issue the Final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida. 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Northwest District
160 Government Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the application, technical evaluations, Draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

PRELIMINARY DETERMINATION

AIR POLLUTION CONTROL RETROFIT PROJECT

Bay County Resource Recovery Facility
Panama City, Florida
Bay County

DEP FILE: 0050031-009-AC (PSD-FL-129C)



Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
North Permitting Section

January 16, 2004

PRELIMINARY DETERMINATION

FACILITY HISTORY

The Bay County Resource Recovery Facility includes two municipal waste combustors (MWCs). It is located near Highway 231, North of Panama City. The facility was constructed under DEP Permits AC 03-84703 and AC 03-84704 issued September 24, 1984. DEP Permits AC 03-145061, AC 03-152196, as well as PSD-FL-129 were issued in October, 1988 and authorized municipal solid waste (MSW) throughput to 255 tons per day (TPD) per unit. In January 1990, new construction and PSD permits were issued, superceding prior permits. The PSD permit included revised lead emissions limits, but was otherwise similar to the 1988 permit. In 1999, the facility put in place physical modifications which derated the capacity of each MWC to 245 TPD. This modification was made via a Title V permit revision, and causes the Bay County MWC's to be considered as 'small' instead of 'large' MWC's, since the threshold is 250 TPD. A small MWC unit is defined as an incinerator or waste-to-energy facility with the capacity to combust 35 to 250 tons of household, commercial/retail, or institutional waste per day.

SMALL MWC STANDARDS

By way of background, EPA issued two final rules on December 6, 2000, establishing air emission standards for small MWC units. The guidelines and the Federal plan requirements apply to municipal waste combustion units where construction began on or before August 30, 1999, and where the unit has the capacity to combust 35 to 250 tons per day of municipal solid waste or refuse-derived fuel (40 CFR 60.1550 and 62.15010).

The first rule (65 FR 76350) contained new source performance standards for new, small MWC units (40 CFR Part 60 Subpart AAAA). The second rule (65 FR 76378) contained emission guidelines for existing, small MWC units (40 CFR 60 Subpart BBBB). States with existing, small MWCs were directed in the second rule to submit a plan to EPA by December 6, 2001, implementing the emission guidelines (40 CFR 60.1505).

EPA's Office of Environmental Policy and Guidance issued a memorandum and attachment summarizing these two rules on March 12, 2001. The memorandum and attachment can be accessed at <http://homer.ornl.gov/oepa/guidance/caa/mwcnotices.pdf>. The final rule issued January 31, 2003, promulgates a Federal plan to implement the 40 CFR 60 Subpart BBBB emission guidelines for small MWC units located in areas not covered by an EPA-approved State or tribal plan. As of this writing, Florida has not yet received full approval of its SIP plan revision which was submitted to the USEPA Region IV Office in December of 2001. However, FDEP expects eventual approval of the plan which mimics the Federal requirements, includes more stringent mercury emissions and requires that state compliance be achieved by November 15, 2005. Accordingly, the Federal plan is considered as interim because upon the effective date of Florida's plan, the Federal plan will no longer apply.

APPLICATION FOR CONSTRUCTION PERMIT

On December 19, 2003 the Department received a request to retrofit the facility with upgraded air pollution controls. The following construction activities are requested in order to comply with the requirements of 40 CFR Subpart BBBB, which become effective by November 15, 2005 (based upon Florida's SIP):

A Spray Dry Absorber (SDA) and fabric filter baghouse (FF) will be installed on each unit. Flue gas from each SDA will be discharged into the corresponding FF which will replace the existing ESP. In order to accommodate this pollution control equipment, two ID Fans will be installed on each unit (or per train). A system for injecting carbon into the flue gas ductwork upstream of the SDA and for injecting lime slurry into the SDA will be installed on each unit. New flue gas stacks (which will re-

PRELIMINARY DETERMINATION

the existing stacks), a pebble lime storage silo (complete with lime slakers and lime slurry pumps) and one powdered activated carbon storage silo (complete with metering and transport blowers) will also be constructed. Lastly, two pneumatic fly ash handling systems (one per train), a compressed air system and associated buildings and structures are requested for construction/installation.

Bay County maintains that these modifications will allow it to comply with the applicable Federal and State requirements.

EXISTING PSD PERMIT

For the record, what follows is a re-statement of the existing PSD permit (Specific Conditions only) which is on file with the Department. This permit was issued on January 4, 1990.

1. This permit shall supercede the previous permits, which have the same numbers, issued for the Bay County Waste-to-Energy Facility on October 17, 1988.
2. Municipal Waste Combustor
 - a. The maximum charging rate of each municipal waste combustor (MWC) shall not exceed ~~255~~ 245 tons of municipal solid waste (MSW) per day (a total of ~~540~~ 490 TPD for the facility); ~~95.6~~ 91.875 million BTU heat input per hour, assuming a heating value of 4,500 BTU per pound; and a steam production rate of ~~68,000~~ 65,333 lbs/hr (derated design capacity) over any 24-hour rolling average period for each unit. Steam flow shall not exceed an average of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit. A 7-day-average, as of 8 am.- Monday, shall be used to determine the charging rate for each MWC. Load cells used on the loading conveyors shall be used for information purposes, and to determine their accuracy and validity.
 - b. The wood waste utilization rate shall not exceed 160 TPD for the facility. Wood waste shall be used when sufficient MSW is not available to maintain a steady heat rate.
 - c. The furnace mean temperature at the fully mixed zone of the combustor shall not be less than 1,800° F.
 - d. The normal operating range of the MWC shall be 80% to 100% of design rated capacity.
 - e. The MWC shall be fueled with the municipal solid waste and wood waste only. Other wastes shall not be burned without specific prior written approval of DER.
 - f. Auxiliary fuel burners shall be fueled only with distillate fuel oil or natural gas. If the annual capacity factor for oil or gas is greater than 10%, as determined by 40 CFR 60.43b(d), the facility shall be subject to 40 CFR 60.44b, standards for nitrogen oxides.
 - g. Auxiliary fuel burners shall be used at start up during the introduction of MSW fuel until design furnace gas temperature is achieved.
 - h. The facility may operate continuously (8760 hrs/yr).
3. Each MWC shall be equipped with an electrostatic precipitator for particulate emission control.
4. Flue gas emissions from the facility shall not exceed the following:

Pollutant	Emission Limitations in lbs/hr		TPY	Emission Factors in lb/ton	
	Per Unit	Facility		Wood	MSW
PM, PM ₁₀	6.8	13.5	59.1	(0.03 gr/dscf)	
CO	92.8	185.6	812.9	20.0	3.58
NO _x	26.9	53.9	236.1	2.8	2.41
SO ₂	35.8	71.5	313.2	0.3	3.36
VOC	7.1	14.2	62.2	1.7	0.196
Lead	0.10	0.20	0.876	0	0.0096
Mercury	0.18	0.36	1.58	0	0.0017
Beryllium	5 x 10 ⁻⁶	1 x 10 ⁻⁵	4.4 x 10 ⁻⁵	0	4.8 x 10 ⁻⁷
Fluoride	0.15	0.30	1.310	0	0.014

PRELIMINARY DETERMINATION

The following are tabulates for PSD and inventory purposes:

Pollutant	Emission Limitations in lbs/hr		TPY	Emission Factors in lb/ton	
	Per Unit	Facility		Per Unit	Facility
Hydrogen Chloride	61.7	123.3	540.0	0	5.8
Sulfuric Acid Mist	1.5	3.0	13.1	0	0.14

Visible emissions shall not exceed 15% opacity (6 min. average).

PM₁₀ emissions are conservatively assumed to be equal to 100% PM.

Compliance with the permit emission limits shall be determined by EPA reference method tests included in 40 CFR Parts 60 and 61 (July 1, 1987 version) and listed in Condition No. 5 of this permit or by equivalent methods approved by Florida DER.

For the purpose of establishing specific increment consumption for TSP and SO₂ at the facility, an hourly emission rate shall be established for each pollutant at the time of performance testing.

The combustors are subject to 40 CFR Part 60, Subpart E; and Subpart Db, when heat input per unit exceeds 100 MMBtu/hr; except that where requirements within the permit are more restrictive, the requirements of the permit shall apply.

5. Compliance Test

- a. Initial compliance tests for particulate matter, SO₂, nitrogen oxides, CO, VOC, lead, fluorides, mercury and beryllium shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e) and (f).
- b. Annual compliance tests for particulate matter, sulfur dioxide, and nitrogen oxides shall be performed.
- c. Initial and annual visible emissions compliance tests shall be determined in accordance with 40 CFR 60.11(b) and (e).
- d. The compliance tests shall be conducted within 10% of the maximum capacity and firing rate of each permitted fuel.
- e. The following test methods and procedures of 40 CFR Parts 60 and 61 or other DER approved methods with prior DER approval shall be used for compliance testing:
 - (1) Method 1 for selection of sample site and sample traverses.
 - (2) Method 2 for determining stack gas flow rate.
 - (3) Method 3 or 3A for gas analysis for calculation of percent O₂ and CO₂.
 - (4) Method 4 for determining stack gas moisture content to convert the flow rate from actual standard cubic feet to dry standard cubic feet.
 - (5) Method 5 or 17 for particulate matter.
 - (6) Method 9 for visible determination of the opacity of emissions as required in this permit in accordance with 40 CFR 60.11.
 - (7) Method 6, 6C or 8 for SO₂.
 - (8) Method 7, 7A, 7B, 7C, 7D or 7E for nitrogen oxides.
 - (9) Method 10 for CO.
 - (10) Method 12 for lead.
 - (11) Method 13B for fluorides.
 - (12) Method 25 or 25A for VOC's.
 - (13) Method 101A for mercury.
 - (14) Method 104 for beryllium.

6. Continuous Emission Monitoring

Continuous emission monitors for opacity, oxygen, and carbon monoxide shall be installed, calibrated, maintained and operated for each unit.

- a. Each continuous emission monitoring system (CEMS) shall meet performance specifications for 40 CFR 60, Appendix B.
- b. CEMS data shall be recorded during periods of startup, shutdown and malfunction but shall be excluded from emission averaging calculations for CO and opacity.

PRELIMINARY DETERMINATION

- c. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.
 - d. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation and operation of all CEMS.
 - e. Opacity monitoring system data shall be reduced to 6-minute averages, based on 36 or more data points, and gaseous CEMS data shall be reduced to 1-hour averages, based on 4 or more data points, in accordance with 40 CFR 60.13(h).
 - f. CO emissions, corrected to 7% O₂, shall be recorded. A wet O₂ monitor may be used for CO emission correction. A wet O₂ monitor shall be corrected to dry basis using a moisture correction determined annually using EPA Method 4. A CO value of 400 ppmvd shall indicate good combustion (800 ppm corresponds to the emission limitation in Condition No. 4).
 - g. For purposes of reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Condition No. 8 herein, which exceeds the applicable emission limit in Condition No. 4.
7. Operations Monitoring
- a. Devices shall be installed to continuously monitor and record steam production, furnace exit gas temperature (FEGT) and flue gas temperature at the exit of the control equipment. An FEGT to combustion zone correlation shall be established to relate furnace temperature at the temperature monitor location to furnace temperature in the overfire air fully mixed zone.
 - b. The furnace heat load shall be maintained between 80% and 100% of the design rated capacity during normal operations. The lower limit may be extended provided compliance with the carbon monoxide emissions limit and the FEGT within this permit at the extended turndown rate are achieved.
8. Reporting
- a. A minimum of fifteen (15) days prior notification of compliance test shall be given to DER's Northwest District office.
 - b. The results of compliance test shall be submitted to the Department's Northwest District office within 45 days after completion of the test.
 - c. The owner or operator shall submit excess emission reports for any calendar quarter during which there are excess emissions from the facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. The report shall include the following:
 - (1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and the time of commencement and completion of each period of excess emissions (60.7(c)(1)).
 - (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measure adopted (60.7(c)(2)).
 - (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs and adjustments (60.7(c)(3)).
 - (4) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired or adjusted, such information shall be stated in the report (60.7(c)(4)).
 - (5) The owner or operator shall maintain a file of all measurements, including continuous monitoring systems performance evaluations; monitoring systems or monitoring device calibration; checks; adjustments and maintenance performed on these systems or devices; and all other information required by this permit recorded in a permanent form suitable for inspection (60.7(d)).
9. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to the Department's Northwest District office.

PRELIMINARY DETERMINATION

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air regulation prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).
 11. An application for an operation permit must be submitted to the Northwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).
-

CONCLUSION

In order to have a consistent record, the Department will revise the above permit so as to reflect the reduced throughputs which were previously authorized via the Title V permit. Additionally, given Bay County's assertion that installation of the equipment identified within its application will result in compliance with the new small MWC regulations, the Department will authorize construction. A PSD or BACT Review is not necessary given that the applicant's sole purpose is to comply with the more stringent Federal limits and that no regulated pollutant will increase beyond the PSD Significance levels. All requirements of 40 CFR Subpart BBBB are incorporated by reference herein and become effective at 12:01 a.m. of November 16, 2005.

M.P. Halpin, P.E.

DRAFT

January 16, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Clifton Windham
Director, Utilities Services Department
Montenay Bay, LLC - Bay County RRF
3410 Transmitter Road
Panama City, FL 32404

Re: DEP File No. PSD-FL-129C and 0050031-009-AC
Air Pollution Control Retrofit Project

Dear Mr. Windham:

The Department reviewed your request for an air construction permit in order to retrofit the subject facility as required by 40 CFR 60 Subpart BBBB. As a result of this review, the Department has concluded that construction may be authorized, provided that the PSD permit is additionally revised to reflect the derating of each MWC (which occurred in 1999), since the lowered MWC ratings have prompted the applicability of the Federal Regulation referred to above. Accordingly, this request is acceptable as indicated herein.

Permit PSD-FL-129 is hereby modified as follows:

Specific Condition 2.a.:

The maximum charging rate of each municipal waste combustor (MWC) shall not exceed ~~255~~ 245 tons of municipal solid waste (MSW) per day (a total of ~~540~~ 490 TPD for the facility); ~~95.6~~ 91.875 million BTU heat input per hour, assuming a heating value of 4,500 BTU per pound; and a steam production rate of ~~68,000~~ 65,333 lbs/hr (derated design capacity) over any 24-hour rolling average period for each unit. Steam flow shall not exceed an average of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit. A 7-day-average, as of 8 am.- Monday, shall be used to determine the charging rate for each MWC. Load cells used on the loading conveyors shall be used for information purposes, and to determine their accuracy and validity.

Air Construction Permit No. 0050031-004-AC:

The following construction is authorized in order to comply with the requirements of 40 CFR Subpart BBBB, which become effective by November 15, 2005 (based upon Florida's SIP). It is the Department's expectation that construction will occur as described within your application dated December 18, 2003. The expiration date of the permitted construction activities authorized herein is November 15, 2005. All requirements of 40 CFR Subpart BBBB are incorporated by reference herein and become effective at 12:01 a.m. of November 16, 2005.

New Pollution Control Equipment:

A Spray Dry Absorber (SDA) and fabric filter baghouse (FF) shall be installed on each unit. Flue gases from each SDA shall be discharged into the corresponding FF which will replace the existing ESP. In order to accommodate this pollution control equipment, two ID Fans shall be installed on each unit (one per train). A system for injecting carbon into the flue gas ductwork upstream of the SDA and for injecting lime slurry into the SDA shall be installed on each unit. New flue gas stacks (which will replace the existing stacks), a pebble lime storage silo (complete with lime slakers and lime slurry pumps) and one powdered activated carbon storage silo (complete with metering and transport blowers) shall be constructed. Two pneumatic fly ash handling systems (one per train), a

Mr. C. Windham
January 16, 2004

DRAFT

compressed air system and associated buildings and structures are additionally authorized for construction/installation. In order to monitor data as required by 40 CFR 60 Subpart BBBB, should additional CEMS, replacement of existing CEMS, or replacement of a major component thereof be required, a performance specification test, in accordance with 40 CFR 60, Appendix B, shall be conducted within 60 days of such installation/replacement.

Fugitive Construction Dust Emissions:

The following describes measures which shall be used as necessary, in order to mitigate fugitive dust: water or similar dust suppressant spraying on exposed areas, covering of trucks hauling dust generating materials to and from the site, washing wheels and underbodies of construction vehicles prior to departure from the site, minimizing vehicle flow over non-paved areas and routinely cleaning paved areas.

No other changes to the permit are authorized by this action.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes. Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within (thirty) days after this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Sincerely,

Michael G. Cooke, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PSD Permit Modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

Mr. Clifton Windham, Director, Utilities Services Department *
Mr. Marc Wallace, Air Quality Scientist, CDM *
Mr. Anthony Lore, P.E., CDM *
Mr. Chalmous Beecham, Montenay Bay, LLC
Bay County Board of County Commissioners
Ms. Sandra Veazey, NWD-DEP
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology (X)
 - b) Determination of Prevention of Significant Deterioration (X); and
 - c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Anthony LoRe
 Camp Dresser & McKee, Inc.
 One Cambridge Place, 50 Hampshire Street
 Cambridge, Mass. 02139

2. Article Number (Copy from service label)

7000 2870 0000 7028 3833

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

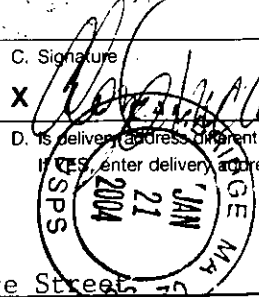
C. Signature

Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes



**U.S. Postal Service
CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7000 2870 0000 7028 3826

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

7000 2870 0000 7028 3833

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Sent To
 Marc Wallace
 Street, Apt. No.; or PO Box No.
 1 Cambridge Pl., 50 Hampshire St.
 City, State, ZIP+4
 Cambridge, Mass. 02139

PS Form 3800, May 2000

See Reverse for Instructions

Sent To
 Anthony LoRe
 Street, Apt. No.; or PO Box No.
 1 Cambridge Pl., 50 Hampshire St.
 City, State, ZIP+4
 Cambridge, Mass. 02139

PS Form 3800, May 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Marc Wallace
 Senior Air Quality Scientist, QEP
 Camp Dresser & McKee, Inc.
 One Cambridge Place, 50 Hampshire Street
 Cambridge, Mass. 02139

2. Article Number (Copy from service label)

7000 2870 0000 7028 3826

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

MARC C. WALLACE 01/20/04

C. Signature

Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) B. Date of Delivery 7/19/04</p> <p>C. Signature X Sabrina Briscoe <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. Clifton Windham Director, Utilities Services Department Bay County RRF 3410 Transmitter Road Panama City, FL 32404</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Copy from service label) 7000 2870 0000 7028 3819</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Postage</td> <td style="width: 10%;">\$</td> <td style="width: 60%;"></td> </tr> <tr> <td>Certified Fee</td> <td></td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> <td></td> </tr> </table>	Postage	\$		Certified Fee			Return Receipt Fee (Endorsement Required)			Restricted Delivery Fee (Endorsement Required)			Total Postage & Fees	\$		Postmark Here
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Certified Fee																
Return Receipt Fee (Endorsement Required)																
Restricted Delivery Fee (Endorsement Required)																
Total Postage & Fees	\$															

Sent To
 Clifton Windham
 Street, Apt. No., or PO Box No.
 3410 Transmitter Road
 City, State, ZIP+4
 Panama City, FL 32404

PS Form 3800, May 2000
See Reverse for Instructions

7000 2870 0000 7028 3819