



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

September 12, 2005

CERTIFIED MAIL – Return Receipt Requested

Mr. Thomas T. Crandall  
Utilities Director  
Bay County Utilities Service Department  
3410 Transmitter Road  
Panama City, Florida 32409

RE: Request for Approval of Two Segregated Bulk Waste Materials Labeled Paint Filters and Mixed Irganox and Irgafos.  
Bay Resource Management Center  
0050031-010-AV

Dear Mr. Crandall:

We have evaluated Mr. Beechem's letter, dated August 22<sup>nd</sup>, suggesting that two segregated industrial waste streams (identified as "Paint Filters" and "Mixed Irganox/Irgafos") can be fired pursuant to Condition B.8.1.7(i) in the Title V air operation permit. Condition B.8.1.7 states, "Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the facility (i.e., the following are authorized fuels that are non-MSW material). The total quantity of the following non-MSW material received as segregated loads and burned at the facility shall not exceed 5%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30-day average." Paragraph (i) states, "Waste materials generated by manufacturing, industrial or agricultural activities, provided that these items or materials are substantially similar to items or materials that are found routinely in MSW, subject to prior approval of the Department."

Based on the information provided, we disagree that either of these segregated wastes can be fired pursuant to Condition B.8.1.7(i). These wastes do not appear to be substantially similar to items or materials that are found routinely in MSW. Further consideration of these materials requires the submittal of an application for air construction permit as well as a revision of the Title V air operation permit. The application should clearly address, but not be limited to, the following for each waste: maximum contaminant (HAP) levels; maximum hourly and annual process rates; potential uncontrolled criteria pollutant and HAP emissions from firing waste; potential controlled criteria pollutant and HAP emissions from firing waste; safety issues; special handling procedures; special storage precautions; and, a detailed description of how waste will be mixed with authorized MSW and fired in the combustor. Please identify any assumptions and provide supporting documentation, calculations, and references.

If there are any questions, please give Mr. Bruce Mitchell a call at 850/413-9198 or write to me at the above letterhead address.

Sincerely,

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/jk/rbm

cc: Chalmous Beechem, Montenay Bay LLC  
Sandra Veazey, NWD

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Mr. Thomas T. Crandall  
 Utilities Director  
 Bay County Utilities Service Department  
 3410 Transmitter Road  
 Panama City, Florida 32409

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Mr. Thomas T. Crandall, Utilities Director

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 Panama City, Florida 32409