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BUREAU OF AIR REGULATION

07-085-0625-Trialburn-glycerinFLDEP

June 25, 2007

Mr. Rick Bradburn
Florida DEP
60 Governmental Center, Suite 308
Pensacola, FL 32502-5794

RE: Montenay Bay Trial Burn of Segregated Bulk Waste Material (Glycerin)

Dear Mr. Bradburn:

Title V Final Permit Number: 0050031-010-AV
Facility ID Number: 0050031

This letter serves to give the Florida DEP notice that Montenay Bay completed the trial burn of glycerin. As per requirements of the approval letter from Trina Veilhauer dated February 8, 2007, this letter also includes a report on the trial burn and its effect upon the unit.

Per the requirements of the letter, glycerin feed rate was not to exceed 5% by weight of the total waste feed rate to the MWC. By the letter's own calculation, Montenay Bay could not exceed 96 gallons per hour to meet that requirement. Montenay Bay must meet its normal Title V air emissions requirements during this trial burn. Finally, the trial burn must be completed no later than June 1, 2007.

Montenay Bay did not exceed any air emissions requirements during the evolution. In the following chart, the emissions limits for Montenay Bay per its Title V are as follows:

Steam Flow Limit (4-hour block average)	66.667 klbs/hr
Steam Flow Limit (24-hour rolling average)	65.333 klbs/hr
CO	250 ppm corrected to 7% O ₂
NO _x	170 ppm corrected to 7% O ₂
SO ₂	31 ppm corrected to 7% O ₂



Furnace Temperature	Minimum of 673 °F
Baghouse Inlet Temperature	Cannot exceed 673 °F
Opacity	Less than 10% for six minute average

Montenay Bay used the two feed rates of 35 and 70 gallons per hour during the evolution. Montenay Bay saw no difference in the firing rate and emissions when adding the glycerin. Included in this letter are the same operational hours for #2 Unit which was not being fed Glycerin which serves as baseline data (see attached). *It is our opinion, that the operational effect of burning Glycerin was negligible at the prescribed feed rate.*

Montenay Bay's trial burn was conducted from May 29 to June 1, 2007.

Thank you for your assistance in making this trial burn possible. Please contact me (850-785-7933 ext 206) if you have any questions or concerns.

Sincerely,

Jerome Barthelemy
EH&S Manager
Montenay Bay LLC

JB/mr

Attachment: Trial Burn Data for Both Units

CC Bruce Mitchell, FL DEP
CC Richard Brookins, FL DEP
CC Anetha Lue, VESNA

Unit #1 Glycerin Burn Data

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
5/29/2007 0:00	55.5	11.7	98	2	106	1407	307	1.4	9.58	0
5/29/2007 1:00	54.9	11.9	156	0	99	1378	300	1.1	9.48	0
5/29/2007 2:00	55.4	11.8	122	0	98	1390	294	1	9.56	0
5/29/2007 3:00	55.3	11.7	65	0	110	1428	302	1	9.55	0
5/29/2007 4:00	55.2	11.9	77	0	114	1406	314	1.6	9.53	0
5/29/2007 5:00	55	12.2	280	2	102	1369	311	1.2	9.49	0
5/29/2007 6:00	54.7	12.3	120	2	112	1382	295	1	9.44	0
5/29/2007 7:00	56.1	12.3	204	0	92	1404	295	1	9.68	0
5/29/2007 8:00	60.8	11.5	149	25	105	1485	303	1.1	10.50	0
5/29/2007 9:00	64.3	11.4	61	34	113	1499	298	1	11.10	35
5/29/2007 10:00	64.5	11.5	112	18	118	1459	306	1	11.13	35
5/29/2007 11:00	64.1	11.3	68	16	114	1478	312	1	11.06	35
5/29/2007 12:00	57.8	12	162	12	119	1461	317	1.1	9.98	35
5/29/2007 13:00	55.5	12.2	128	5	112	1417	331	1	9.58	35
5/29/2007 14:00	62.5	11.4	161	9	99	1478	328	1	10.79	35
5/29/2007 15:00	64.5	11.2	66	7	123	1484	328	1.1	11.13	35
5/29/2007 16:00	64.6	11	51	0	111	1479	322	1	11.15	35
5/29/2007 17:00	64	11.2	67	0	109	1464	320	1	11.05	35
5/29/2007 18:00	54.7	12.5	89	5	132	1399	325	1.1	9.44	35
5/29/2007 19:00	55.4	12.3	61	16	134	1410	323	1	9.56	35
5/29/2007 20:00	55.1	12.2	75	11	123	1398	328	1	9.51	35
5/29/2007 21:00	54.9	12.3	68	5	123	1393	329	1	9.48	35
5/29/2007 22:00	56.4	11.9	73	14	127	1424	328	1	9.74	35
5/29/2007 23:00	57.1	11.6	135	21	108	1464	326	1.1	9.86	35
Daily Averages	58.26	11.80	110.33	8.50	112.63	1431.50	314.25	1.08	10.06	21.88
Daily Sum									241.37	525.00

Unit #1 Glycerin Burn Data

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
5/30/2007 0:00	56.5	11.8	73	15	122	1451	331	1	9.75	35
5/30/2007 1:00	58.3	10.7	151	12	94	1474	329	1	10.06	35
5/30/2007 2:00	54.8	11.8	37	6	130	1428	330	1	9.45	35
5/30/2007 3:00	55.5	11.7	62	3	128	1418	332	1	9.58	35
5/30/2007 4:00	55.1	12.1	84	13	139	1423	327	1.1	9.51	35
5/30/2007 5:00	55.2	12.3	97	16	142	1402	321	1.1	9.52	35
5/30/2007 6:00	55.3	12.5	93	18	152	1383	302	1	9.54	35
5/30/2007 7:00	54.9	12.5	86	13	147	1382	304	1	9.47	35
5/30/2007 8:00	55.2	12.5	119	22	136	1363	309	1.1	9.52	35
5/30/2007 9:00	56	12.7	137	22	136	1397	320	1	9.66	70
5/30/2007 10:00	56.9	12.4	134	16	139	1402	328	1	9.82	70
5/30/2007 11:00	55	12.4	168	16	123	1395	321	1	9.49	70
5/30/2007 12:00	55.3	12.4	80	11	132	1412	313	1.1	9.54	70
5/30/2007 13:00	56	12.4	216	18	124	1426	316	1	9.66	70
5/30/2007 14:00	56.8	12.1	139	16	114	1442	322	1	9.80	70
5/30/2007 15:00	56.7	12.1	139	14	107	1456	320	1	9.78	70
5/30/2007 16:00	56.9	12.1	144	11	101	1471	322	1.1	9.82	70
5/30/2007 17:00	56.1	12.3	134	11	113	1454	328	1	9.68	70
5/30/2007 18:00	55.8	12.2	118	6	129	1425	328	1	9.63	70
5/30/2007 19:00	55.8	12.4	80	10	132	1416	320	1.1	9.63	70
5/30/2007 20:00	55.9	12.3	53	10	133	1422	324	1	9.64	70
5/30/2007 21:00	55.6	12.2	50	8	133	1419	320	1	9.59	70
5/30/2007 22:00	56	12.3	52	11	141	1435	314	1.1	9.66	70
5/30/2007 23:00	55.7	12.3	66	8	133	1429	328	1	9.61	70
Daily Averages	55.89	12.19	104.67	12.75	128.33	1421.88	321.21	1.03	9.64	56.88
Daily Sum									231.41	1365.00

Unit #1 Glycerin Burn Data

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
5/31/2007 0:00	57.4	12.1	131	11	120	1448	322	1.1	9.47	70
5/31/2007 1:00	61.9	11.5	127	18	115	1494	326	1	10.21	70
5/31/2007 2:00	64.5	11.1	71	18	122	1532	330	1.1	10.64	70
5/31/2007 3:00	64.8	11.1	91	14	129	1558	331	1.1	10.69	70
5/31/2007 4:00	64.6	11.1	173	11	119	1549	329	1.1	10.66	70
5/31/2007 5:00	64.9	10.8	175	17	111	1563	328	1.3	10.71	70
5/31/2007 6:00	65.2	11.4	82	19	136	1501	327	1.1	10.76	70
5/31/2007 7:00	64.5	11.5	70	9	130	1501	326	1.1	10.64	70
5/31/2007 8:00	64.3	11.3	39	4	132	1492	327	1.1	10.61	70
5/31/2007 9:00	64.5	11.7	35	15	125	1484	327	1	10.64	70
5/31/2007 10:00	55.9	12.5	53	2	142	1400	321	1	9.22	70
5/31/2007 11:00	55.3	12.8	74	3	146	1370	320	1.1	9.12	70
5/31/2007 12:00	55.8	12.5	68	3	144	1378	327	1	9.21	70
5/31/2007 13:00	55.2	12.4	101	0	118	1404	331	1	9.11	70
5/31/2007 14:00	55.5	12.6	119	0	116	1431	327	1	9.16	70
5/31/2007 15:00	64.4	11.5	109	6	101	1477	322	1	10.62	70
5/31/2007 16:00	64.5	11.5	182	16	90	1484	325	1.1	10.64	70
5/31/2007 17:00	64.9	11.4	165	16	99	1492	314	1	10.71	70
5/31/2007 18:00	65.2	11.3	68	19	111	1511	319	1.1	10.76	70
5/31/2007 19:00	64.7	11.5	53	16	121	1502	329	1	10.67	70
5/31/2007 20:00	59.1	11.8	173	9	122	1467	325	1.1	9.75	70
5/31/2007 21:00	56	12.4	54	7	149	1413	328	1	9.24	70
5/31/2007 22:00	56	12.3	57	5	147	1405	330	1	9.24	70
5/31/2007 23:00	55.8	12.3	65	8	136	1407	326	1.1	9.21	70
Daily Averages	61.04	11.77	97.29	10.25	124.21	1469.29	325.71	1.06	10.07	70.00
Daily Sum									241.66	1680.00

Unit #1 Glycerin Burn Data

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
6/1/2007 0:00	55.9	12.3	55	6	141	1405	330	1	9.60	70
6/1/2007 1:00	55.8	12.2	45	0	144	1428	328	1	9.58	70
6/1/2007 2:00	56	12.3	48	0	145	1423	331	1.1	9.62	70
6/1/2007 3:00	55.8	12.2	58	0	141	1416	330	1	9.58	70
6/1/2007 4:00	55.9	12.3	53	0	137	1419	330	1.1	9.60	70
6/1/2007 5:00	55.9	12.2	53	0	133	1434	328	1.3	9.60	70
6/1/2007 6:00	56	12.5	58	0	144	1418	326	1.1	9.62	70
6/1/2007 7:00	55.9	12.5	63	0	141	1408	329	1	9.60	70
6/1/2007 8:00	55.8	12.5	68	0	144	1406	331	1.1	9.58	70
6/1/2007 9:00	56	12.5	86	0	137	1401	329	1	9.62	70
6/1/2007 10:00	56.2	12.3	74	0	131	1403	330	1.1	9.65	70
6/1/2007 11:00	56.1	12.4	90	0	137	1394	329	1	9.64	0
6/1/2007 12:00	58.3	11.8	79	0	131	1440	331	1	10.01	0
6/1/2007 13:00	56.7	12.2	62	0	129	1430	330	1.1	9.74	0
6/1/2007 14:00	57	12.1	52	0	118	1433	330	1	9.79	0
6/1/2007 15:00	56	12.5	46	0	137	1419	330	1.1	9.62	0
6/1/2007 16:00	56.6	12.5	45	0	139	1417	330	1.1	9.72	0
6/1/2007 17:00	55.9	12.7	54	3	136	1401	330	1	9.60	0
6/1/2007 18:00	56.4	12.6	52	12	139	1413	329	1.1	9.69	0
6/1/2007 19:00	61.4	12	62	16	125	1469	326	1	10.55	0
6/1/2007 20:00	63.7	11.7	66	18	116	1510	323	1.1	10.94	0
6/1/2007 21:00	63.9	11.8	55	17	115	1506	321	1	10.98	0
6/1/2007 22:00	64.4	11.6	64	12	96	1526	329	1.1	11.06	0
6/1/2007 23:00	64	11.4	139	3	95	1531	330	1	10.99	0
Daily Averages	57.73	12.21	63.63	3.63	131.29	1435.42	328.75	1.06	9.92	32.08
Daily Sum									237.99	770.00
Overall Averages	58.23	11.99	93.98	8.78	124.11	1439.52	322.48	1.06	9.92	45.21

Unit #2 Combustion Data (No Glycerin Processed)

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
5/29/2007 0:00	64.5	11.2	145	0	126	1505	330	2	11.13	0
5/29/2007 1:00	64.2	11.5	81	0	152	1448	330	2	11.08	0
5/29/2007 2:00	64.4	11.8	89	0	156	1442	331	2	11.12	0
5/29/2007 3:00	64	12	183	0	144	1396	330	2	11.05	0
5/29/2007 4:00	60.5	12.2	203	0	166	1389	330	2	10.44	0
5/29/2007 5:00	49.6	12.7	461	0	170	1328	326	2	8.56	0
5/29/2007 6:00	41.8	14.4	840	0	173	1214	333	2	7.22	0
5/29/2007 7:00	57.5	13	222	0	172	1393	330	2	9.93	0
5/29/2007 8:00	63.8	12.2	336	0	117	1357	329	2	11.01	0
5/29/2007 9:00	62.8	11.8	205	47	127	1406	330	2	10.84	0
5/29/2007 10:00	64.7	11.5	364	118	105	1420	318	2	11.17	0
5/29/2007 11:00	64.3	8.5	317	12	206	1461	327	2	11.10	0
5/29/2007 12:00	63.8	11.7	88	11	162	1446	331	2	11.01	0
5/29/2007 13:00	64.6	11.6	76	1	161	1455	329	2	11.15	0
5/29/2007 14:00	64	11.4	80	0	143	1449	330	2	11.05	0
5/29/2007 15:00	64.6	11.6	85	0	157	1433	329	2	11.15	0
5/29/2007 16:00	62.6	12.1	302	0	131	1371	328	2	10.81	0
5/29/2007 17:00	61	12	151	0	147	1408	328	2	10.53	0
5/29/2007 18:00	63.4	11.7	115	0	139	1460	331	2	10.94	0
5/29/2007 19:00	61.2	12	144	0	144	1442	330	2	10.56	0
5/29/2007 20:00	61.6	12	166	0	139	1457	330	2	10.63	0
5/29/2007 21:00	59.4	12.1	183	0	145	1439	330	2	10.25	0
5/29/2007 22:00	60.8	11.8	148	0	142	1455	331	2	10.50	0
5/29/2007 23:00	60.1	11.7	145	0	136	1446	330	2	10.37	0
Daily Averages	61.22	11.85	213.71	7.88	148.33	1417.50	329.21	2.00	10.57	0.00
Daily Sum									253.61	0.00

Unit #2 Combustion Data (No Glycerin Processed)

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
5/30/2007 0:00	64.8	11.2	109	0	112	1476	328	2	11.18	0
5/30/2007 1:00	64.5	10.4	118	3	98	1496	329	2	11.13	0
5/30/2007 2:00	64.3	10.6	65	3	107	1499	330	2	11.09	0
5/30/2007 3:00	63.6	11.4	67	0	139	1479	331	2	10.97	0
5/30/2007 4:00	64.9	11.1	62	6	139	1489	332	2	11.20	0
5/30/2007 5:00	64.2	11.4	80	0	139	1477	328	2	11.08	0
5/30/2007 6:00	64.5	11.7	94	3	142	1463	331	2	11.13	0
5/30/2007 7:00	63.9	11.7	89	0	142	1451	331	2	11.02	0
5/30/2007 8:00	64.7	12.1	100	2	145	1452	328	2	11.16	0
5/30/2007 9:00	64.6	11.5	104	0	124	1452	331	2	11.15	0
5/30/2007 10:00	62.9	12	100	0	148	1425	331	2	10.85	0
5/30/2007 11:00	62.7	12	134	0	141	1416	330	2	10.82	0
5/30/2007 12:00	62.4	12.2	173	0	152	1416	333	2	10.77	0
5/30/2007 13:00	61.3	11.8	209	0	116	1429	327	2	10.58	0
5/30/2007 14:00	63.4	11.5	90	0	142	1462	331	2	10.94	0
5/30/2007 15:00	62.2	11.9	116	0	144	1424	329	2	10.73	0
5/30/2007 16:00	63.9	11.6	145	0	133	1452	330	2	11.02	0
5/30/2007 17:00	64.4	11.4	114	0	135	1484	331	2	11.11	0
5/30/2007 18:00	64.3	11.4	107	0	130	1515	331	2	11.09	0
5/30/2007 19:00	63.9	11.5	96	0	133	1505	331	2	11.02	0
5/30/2007 20:00	63	11.7	121	2	137	1508	331	2	10.87	0
5/30/2007 21:00	58.3	12.3	142	2	157	1440	330	2	10.06	0
5/30/2007 22:00	55.1	12.7	241	0	158	1397	330	2	9.51	0
5/30/2007 23:00	56.9	12.4	209	0	167	1422	330	2	9.82	0
Daily Averages	62.86	11.65	120.21	0.88	136.67	1459.54	330.17	2.00	10.85	0.00
Daily Sum									260.29	0.00

Unit #2 Combustion Data (No Glycerin Processed)

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
5/31/2007 0:00	63.4	11.5	154	0	135	1490	329	2	10.46	0
5/31/2007 1:00	64	10.9	359	0	89	1475	331	2	10.56	0
5/31/2007 2:00	64.6	11.4	183	0	138	1485	330	2	10.66	0
5/31/2007 3:00	64.7	11	67	0	152	1526	331	2	10.67	0
5/31/2007 4:00	64.5	10.5	79	0	126	1548	331	2	10.64	0
5/31/2007 5:00	64.7	10.7	108	4	146	1510	328	2	10.67	0
5/31/2007 6:00	64.3	11	94	4	142	1473	324	2	10.61	0
5/31/2007 7:00	64.5	11.3	75	0	149	1477	330	2	10.64	0
5/31/2007 8:00	64.5	10.9	104	1	129	1493	331	2	10.64	0
5/31/2007 9:00	63.6	12	230	11	134	1460	330	2	10.49	0
5/31/2007 10:00	64.1	11.5	114	0	145	1523	332	2	10.57	0
5/31/2007 11:00	64.6	11.1	113	0	123	1537	329	2	10.66	0
5/31/2007 12:00	64.3	11.3	407	0	98	1468	331	2	10.61	0
5/31/2007 13:00	64	11.4	119	0	139	1478	331	2	10.56	0
5/31/2007 14:00	62.7	11.6	109	0	140	1479	329	2	10.34	0
5/31/2007 15:00	64.2	11.4	158	0	133	1498	330	2	10.59	0
5/31/2007 16:00	63.9	11.3	145	0	127	1494	331	2	10.54	0
5/31/2007 17:00	64.5	11.4	132	0	123	1485	328	1.9	10.64	0
5/31/2007 18:00	64.7	11.1	122	1	125	1515	329	2	10.67	0
5/31/2007 19:00	64.1	11.2	93	0	126	1546	332	2	10.57	0
5/31/2007 20:00	61.6	11.4	142	0	135	1517	330	2	10.16	0
5/31/2007 21:00	63.9	11.2	92	0	129	1521	329	2	10.54	0
5/31/2007 22:00	64.3	11.1	91	0	128	1534	331	2	10.61	0
5/31/2007 23:00	64.6	11.4	113	0	132	1510	331	2	10.66	0
Daily Averages	64.10	11.23	141.79	0.88	130.96	1501.75	329.92	2.00	10.57	0.00
Daily Sum									253.77	0.00

Unit #2 Combustion Data (No Glycerin Processed)

Date/Time	Steam Flow (klb/hr)	O2 (%)	COc (ppm)	SO2c (ppm)	NOxc (ppm)	Furnace Temp (°F)	Baghouse Inlet (°F)	Opacity (%)	Est. MSW Charge Rate (tons/hr)	Glycerin Feed Rate (gal/hr)
6/1/2007 0:00	64.1	11.5	121	0	129	1480	329	2	11.01	0
6/1/2007 1:00	62.1	11.6	126	0	133	1462	330	2	10.67	0
6/1/2007 2:00	64.8	11.4	123	0	123	1483	328	2	11.13	0
6/1/2007 3:00	63.9	11.4	132	0	127	1510	331	2	10.98	0
6/1/2007 4:00	64.4	11.4	72	0	139	1482	329	2	11.06	0
6/1/2007 5:00	64.2	10.8	80	0	125	1525	332	2	11.03	0
6/1/2007 6:00	63.5	11.3	80	0	139	1473	331	2	10.91	0
6/1/2007 7:00	63.2	11.5	80	0	154	1467	329	2	10.85	0
6/1/2007 8:00	64.2	11.5	87	0	151	1456	330	2	11.03	0
6/1/2007 9:00	64.5	11.6	124	0	146	1446	329	2	11.08	0
6/1/2007 10:00	62.4	11.8	170	0	137	1406	331	2	10.72	0
6/1/2007 11:00	64.7	10.5	151	0	119	1500	328	2	11.11	0
6/1/2007 12:00	64.3	11	213	0	117	1474	331	2	11.04	0
6/1/2007 13:00	64.2	11.1	133	0	146	1503	330	2	11.03	0
6/1/2007 14:00	64.2	11.2	96	0	143	1536	331	2	11.03	0
6/1/2007 15:00	64.5	10.8	129	0	124	1524	331	2	11.08	0
6/1/2007 16:00	64.4	11.1	54	0	155	1438	331	2	11.06	0
6/1/2007 17:00	64.5	11.4	221	0	123	1434	329	2	11.08	0
6/1/2007 18:00	64.6	11.3	191	1	127	1431	330	2	11.10	0
6/1/2007 19:00	64.2	11.6	245	3	127	1409	331	2	11.03	0
6/1/2007 20:00	64.6	11.5	80	0	140	1457	330	2	11.10	0
6/1/2007 21:00	64.5	11.3	64	1	132	1485	332	2	11.08	0
6/1/2007 22:00	64.5	11	44	0	124	1496	328	2	11.08	0
6/1/2007 23:00	64.8	10.6	69	0	116	1515	330	2	11.13	0
Daily Averages	64.14	11.26	120.21	0.21	133.17	1474.67	330.04	2.00	11.02	0.00
Daily Sum									264.38	0.00
Overall Averages	63.08	11.50	148.98	2.46	137.28	1463.36	329.83	2.00	10.75	0.00