

— second file —

**MONTENAY BAY LLC**



**RECEIVED**

MAR 22 2004

BUREAU OF AIR REGULATION

MBLLC/DEP-04-0128-RO

March 3, 2004

Ms. Sandra Veazey  
Florida DEP  
160 Governmental Center  
Pensacola, Fl 32501-5794

SUBJECT: Title V FINAL Permit No.: 0050031-002-AV  
Responsible Official

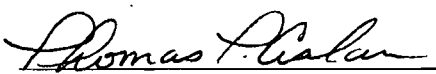
Dear Ms. Veazey:

In a letter from me dated June 14, 2001, I indicated that Clifton "Travis" Windham, P.E., Bay County Utility Services Department Director, was to be listed in your records as the Responsible Official for the Bay Resource Management Center.

Mr. Windham has retired from the position as Bay County Utility Services Department Director, effective 1/23/2004.

Please update your records to indicate Mr. Thomas T. Crandall, Bay County Utility Services Department Director, is the new Responsible Official for Bay Resource Management Center. Mr. Crandall meets the definition of Responsible Official as set forth in F.A.C. 62-213.302.

Mr. Crandall is in agreement with this change as indicated by his signature below.

 3/12/04

Thomas T. Crandall                      Date  
Bay County Utility Services Department Director  
3410 Transmitter Rd  
Panama City FL 32409

# MONTENAY BAY LLC



MBLLC/04-0128-RO Page 2

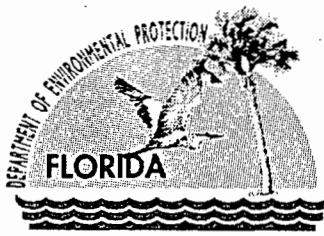
Please contact me at (850) 785-7933, x206 if you need further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Chalmous Beechem".

Chalmous Beechem  
Operations Manager

cc: Jerry Gross, Montenay Bay, LLC  
Clair Fancy, P.E., Bureau of Air Regulation, DEP  
Scott Sheplak, P.E., Bureau of Air Regulation, DEP  
Dave Beachler, URS Corporation  
Thomas T. Crandall, Bay County



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

February 4, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. C. Travis Windham, P.E.  
Director, Bay County Public Utilities  
3410 Transmitter Road  
Panama City, Florida 32404

RE: Request for Approval of a Segregated Bulk Waste Material  
Bay County Resource Recovery Facility  
0050031-002-AV

Dear Mr. Windham:

The Department has evaluated Mr. Chalmous Beechem's letter received today, which requested approval of a consolidated bulk waste material (labeled as absorbent pads, JP-8 and JP-8 filters, hydraulic fluid, empty grease cartridges, and oil) to be incinerated at the Bay County Resource Recovery Facility as a segregated waste. Based on a review of the request, we feel that the waste stream is permitted to be incinerated under Specific Conditions A.5.1.3., A.5.1.4., and A.5.1.8.(f) & (g), of the above referenced permit. Please note that the waste stream shall not exceed 5%, by weight, of the facility's total fuel; the material is to be appropriately mixed in with the normal waste stream (either on the tipping floor or in the hopper); the segregated material shall not be a hazardous waste; the material shall not have a PCB concentration equal to or greater than 50 ppm; and, compliance with this limitation shall be determined by using a rolling 30-day average. Records of each segregated waste stream delivery shall be maintained for a least 5 years by the operators and shall contain sufficient documentation, such as an ultimate analysis of questionable material(s) and description of the waste stream delivered, to be able to determine acceptability and compliance.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). 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), F.S., 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), F.S., however, any person who asked the permitting authority 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, F.A.C.

*"More Protection, Less Process"*

*Printed on recycled paper.*

Mr. C. Travis Windham, P.E.  
Bay County RRF  
0050031-002-AV  
Request for Approval of a Segregated Bulk Waste Material  
Page 2 of 3

A petition that disputes the material facts on which the permitting authority'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 each 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, as well as the rules and statutes which entitle the petitioner to relief; and,
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority'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, F.A.C.

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

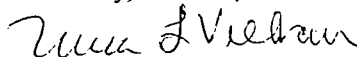
Mediation will not be available in this proceeding.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing 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 application filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Sincerely,



Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/rbm

Enclosure

Mr. C. Travis Windham, P.E.  
Bay County RRF  
0050031-002-AV  
Request for Approval of a Segregated Bulk Waste Material  
Page 3 of 3

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this letter with enclosure and all copies were sent by certified mail before the close of business on 2/4/04 to the person(s) listed:

Chalmous Beechem, Montenay Bay LLC  
Jim Pennington, BAR  
Sandra Veazey, NWD

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

*Sandra Veazey* *2/4/04*  
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <span style="float: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</span>  <b>X Sabrina Briscoe</b></p> <p>B. Received by (Printed Name) <span style="float: right;">C. Date of Delivery</span>  <b>Sabrina Briscoe 2/6/04</b></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:          Mr. C. Travis Windham, P.E.          Director, Bay County Public Utilities          3410 Transmitter Road          Panama City, Florida 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>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) <b>7001 1140 0002 1578 0478</b></p>	
<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Mr. C. Travis Windham, P.E.	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
<b>Sent To</b>	
Mr. C. Travis Windham, P.E.	
Street, Apt. No.; or PO Box No. 3410 Transmitter Road	
City, State, ZIP+4 Panama City, Florida 32404	
PS Form 3800, January 2001 See Reverse for Instructions	

7001 1140 0002 1578 0478

**MONTENAY BAY LLC**



**RECEIVED**

FEB 04 2004

BUREAU OF AIR REGULATION

MBLLC/DEP-04-0203-Wasteapproval

February 3, 2004

Mr. Clair Fancy  
Florida DEP, Bureau of Air Regulation  
Twin Towers Office Building  
Mail Station 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

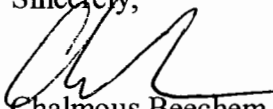
SUBJECT: Waste Approval Consideration  
Title V FINAL Permit No.: 0050031-002-AV  
Approval number 00104, absorbent pads

Dear Mr. Fancy:

I am submitting for consideration a waste stream consisting of absorbent pads, submitted by Soil Remediation, Inc, per section A.5.1.8.(f) of permit. Amount delivered would be 10 tons per month, if approved. Enclosed, please find three pages of additional information. Final approval would be contingent upon evaluation of the first load of material.

Please contact me at (850) 785-7933, x206 if you need further assistance.

Sincerely,



Chalmous Beechem  
Operations Manager

cc Bruce Mitchell, FLDEP

S  
R  
I

# Soil Remediation, Inc.

Complete Waste Solutions

County Road 329  
Ray City, GA 31645

Phone: 229-455-2300  
Fax: 229-455-2301

## Fax

To: Moose From: Meredith Lancaster

Pages (including cover): 4

Phone: \_\_\_\_\_ Date: 1/20/2004

Fax: 850-784-1779 RE: Absorbent pads

- Urgent
- For Review
- Please Comment
- Please Reply
- Please Recycle

• Comments:

Moose -

We currently have about 3 roll-off loads of:  
Petroleum impacted absorbent pads - oil, hydraulic fluid,  
JP8, grease

Oil, hydraulic fluid & JP8 filters - paper and some metal  
Empty grease cartridges  
Drum rags

The attached analysis is representative of  
the material - it's an ongoing waste stream.

Thanks!

Meredith Lancaster



**Summit Environmental Technologies, Inc.**  
*your connection to a cleaner environment*

**A2LA CERTIFICATION NO. 72481**

**Offices in Major U.S. Cities**



November 2, 1998

1/3

Soil Remediation, Inc.  
County Road 329  
Ray City, GA 31645

Date Collected: 10/21/98  
Date Received: 10/22/98  
Project #: SRI Pads  
Laboratory ID #: 982242-01  
Client ID #: 1 - Pads  
Matrix: Solid  
Analysis Date: 10/29/98 (Hg, Cu, Ni, Co, Mn, Sb), 10/28/98 (As, Ba, Cd, Cr, Pb, Hg)

**Total Metals**

<u>Parameter</u>	<u>Detection Limit (mg/kg)</u>	<u>Results (mg/kg)</u>	<u>Method</u>
Antimony	0.25	< 0.25	7041
Arsenic	0.25	< 0.25	7060
Barium	25.0	< 25.0	7088
Beryllium	0.75	< 0.75	7091
Cadmium	0.125	< 0.125	7130
Chromium	1.25	9.5	7190
Cobalt	1.25	2.5	7200
Copper	0.5	15.0	7210
Lead	2.5	< 2.5	7420
Manganese	0.25	3.2	7460
Mercury	0.05	< 0.05	7470
Nickel	1.0	7.5	7520

Laboratory Manager: Benjamin Yousouf *[Signature]*

This report may not be reproduced except in full. The results were only representative of the samples received. Conditions can vary at different times and at different sampling conditions.

**595 East Tallmadge Avenue, Akron, Ohio 44310 TEL: 330.253.8211 FAX: 330.253.4499**

Summit Environmental Technologies, Inc.  
your connection to a cleaner environment

AZLA CERTIFICATION NO. 734.01

Offices in Major U.S. Cities



November 2, 1998

2/3

Soil Remediation, Inc.  
County Road 329  
Ray City, GA 31643

Date Collected: 10/21/98  
Date Received: 10/22/98  
Project #: SRI Pads  
Laboratory ID #: 982242-01  
Client ID #: 1 - Pads  
Matrix: Solid  
Analysis Date: 10/28/98 (So, Ag), 10/29/98 (Zn, V)

Total Metals

<u>Parameter</u>	<u>Detection Limit (mg/kg)</u>	<u>Results (mg/kg)</u>	<u>Method</u>
Selenium	0.5	< 0.5	7740
Silver	0.25	< 0.25	7760
Vanadium	1.25	< 1.25	7910
Zinc	0.125	27.5	7950

Laboratory Manager: Basam Younes

Summit Environmental Technologies, Inc.  
your connection to a cleaner environment

A2LA CERTIFICATION NO. 724.01

Offices in Major U.S. Cities



November 2, 1998

3/3

Soil Remediation, Inc.  
County Road 329  
Ray City, GA 31645

Date Collected: 10/21/98  
Date Received: 10/22/98  
Project #: SRI Peds  
Laboratory ID #: 982242-01  
Client ID #: 1 - Peds  
Matrix: Solid

<u>Parameter</u>	<u>Detection Limit</u>	<u>Results</u>	<u>Method</u>	<u>Date of Analysis</u>
Sulfur	---	0.66 %	ASTM D219-1	10/30/98
Chloride	---	0.48 %	ASTM D803-9	10/30/98
Fluoride	2.0 mg/kg	< 2.0 mg/kg	340.2	10/30/98
Bromine	100.0 mg/kg	< 100.0 mg/kg	---	10/27/98
Iodine	100.0 mg/kg	< 100.0 mg/kg	---	10/29/98
PCBs	2.0 mg/kg	< 2.0 mg/kg	8080	10/30/98
T.O.X.	1.0 mg/kg	255.0 mg/kg	9020	10/30/98

Laboratory Manager: Bassam Yousef

595 East Tallmadge Avenue, Akron, Ohio 44310 TEL: 330.253.8211 FAX: 330.253.4489

**Section III. Emissions Unit(s) and Conditions.****Subsection A. This section addresses the following emissions units.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
-001	Municipal Waste Combustion Unit No. 1 (North)
-002	Municipal Waste Combustion Unit No. 2 (South)

These two Municipal Waste Combustor (MWC) emissions units are identical in configuration. The manufacturer is O'Connor Combustor. The electric generator nameplate rating is 15 MW. Particulate matter emissions are controlled by an electrostatic precipitator at each MWC. Sulfur dioxide emissions are controlled by the low sulfur content of fuels. Stack height is 125 feet. The emissions units' initial startup date was May 1, 1987.

{Permitting note(s): These emissions units are regulated under NSPS - 40 CFR 60, Subpart E, Standards of Performance for Incinerators, adopted and incorporated by reference in Rule 62-204.800(7)5., F.A.C.; Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD)(Permit No. PSD-FL-129); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination.}

**The following conditions apply to the emissions unit(s) listed above:****General.**

**A.1. Definitions.** For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee.

[40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

**A.2. Circumvention.** No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

**Essential Potential to Emit (PTE) Parameters****A.3.1. Capacity.**

(a) The maximum charging rate of each of the two MWC's shall not exceed 245 tons of municipal solid waste (MSW) per day (a total of 490 tons per day for the facility). The maximum heat input rate shall not exceed 91.875 MMBtu per hour, assuming a heating value of 4,500 Btu per pound. Steam flow rate shall not exceed an average of 65,333 lbs/hr 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 seven-day average, as of 8 a.m., Monday, shall be maintained as a weekly record. To determine compliance with the maximum charging capacity, the steam flow meter shall be calibrated, maintained, and operated to measure steam flow in pounds per hour on a continuous basis, and record the

**A.5.0.0. Methods of Operation.**

**A.5.1.0. Fuels.**

**A.5.1.1.** The only fuels allowed to be burned in the MWCs are municipal solid waste and wood waste, with distillate fuel oil as an auxiliary fuel. Other wastes shall not be burned without written prior approval from the Department. The wood waste utilization rate shall not exceed 160 tons per day for the facility. Wood waste shall be used when sufficient MSW is not available to maintain a steady heat rate. [PSD-FL-129]

**A.5.1.2.** The primary fuel for the facility is municipal solid waste (MSW), including the items and materials that fit within the definition of MSW contained in either 40 CFR 60.51b or Section 403.706(5), Florida Statutes (1995). [Rule 62-4.070(3), F.A.C.]

**A.5.1.3. Unauthorized Fuel.** Subject to the limitations contained in this permit, the authorized fuels for the facility also include the other solid wastes that are not MSW which are described in Specific Conditions **A.5.1.6.**, **A.5.1.7.**, and **A.5.1.8.**, below. However, the facility

(a) shall not burn:

- (1) those materials that are prohibited by state or federal law;
- (2) those materials that are prohibited by this permit;
- (3) lead acid batteries;
- (4) hazardous waste;
- (5) nuclear waste;
- (6) radioactive waste;
- (7) sewage sludge;
- (8) explosives;
- (9) beryllium-containing waste, as defined in 40 CFR 61, Subpart C.

(b) and shall not knowingly burn:

- (1) untreated biomedical waste;
- (2) segregated loads of biological waste.

[Rules 62-4.070(3), 62-213.410, and 62-213.440, F.A.C.]

**A.5.1.4.** The fuel may be received either as a mixture or as a single-item stream (segregated load) of discarded materials. If the facility intends to use an authorized fuel that is segregated non-MSW material, the fuel shall be either:

- (a) well mixed with MSW on the tipping floor; or
- (b) alternately charged with MSW in the hopper.

[Rules 62-4.070(3), 62-213.410, and 62-213.440, F.A.C.]

**A.5.1.5.** The facility operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received, and used as fuel at the facility, and subject to a percentage weight limitation, below (Specific Conditions **A.5.1.7.** and **A.5.1.8.**). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation.

[Rules 62-4.070(3), 62-213.410, and 62-213.440, F.A.C.]

**A.5.1.6.** Subject to the conditions and limitations contained in this permit, the following other solid waste may be used as fuel at the facility:

- (a) Confidential, proprietary or special documents (including but not limited to business records, lottery tickets, event tickets, coupons and microfilm);
- (b) Contraband which is being destroyed at the request of appropriately authorized local, state or federal governmental agencies, provided that such material is not an explosive, a propellant, a hazardous waste, or otherwise prohibited at the facility. For the purposes of this section, contraband includes but is not limited to drugs, narcotics, fruits, vegetables, plants, counterfeit money, and counterfeit consumer goods;
- (c) Wood pallets, clean wood, and land clearing debris;
- (d) Packaging materials and containers;
- (e) Clothing, natural and synthetic fibers, fabric remnants, and similar debris, including but not limited to aprons and gloves; or
- (f) Rugs, carpets, and floor coverings, but not asbestos-containing materials or polyethylene or polyurethane vinyl floor coverings.

[Rules 62-4.070(3), 62-213.410, and 62-213.440, F.A.C.]

**A.5.1.7.** Subject to the conditions and limitations contained in this permit, waste tires may be used as fuel at the facility. The total quantity of waste tires received as segregated loads and burned at the facility shall not exceed 3%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30-day average.

[Rules 62-4.070(3), 62-213.410, and 62-213.440, F.A.C.]

**A.5.1.8.** 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.

- (a) Construction and demolition debris.
- (b) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (c) Items suitable for human, plant or domesticated animal use, consumption or application where the item's shelf-life has expired or the generator wishes to remove the items from the market. Such items or materials include but are not limited to off-specification or expired consumer products, pharmaceuticals, medications, health and personal care products, cosmetics, foodstuffs, nutritional supplements, returned goods, and controlled substances.
- (d) Consumer-packaged products intended for human or domesticated animal use or application but not consumption. Such items or materials include but are not limited to carpet cleaners, household or bathroom cleaners, polishes, waxes and detergents.
- (e) Waste materials that:
  - (i) are generated in the manufacture of items in categories (c) or (d), above and are functionally or commercially useless (expired, rejected or spent); or
  - (ii) are not yet formed or packaged for commercial distribution. Such items or materials must be substantially similar to other items or materials routinely found in MSW.
- (f) Waste materials that contain oil from:

- (i) the routine cleanup of industrial or commercial establishments and machinery; or
- (ii) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (g) Used oil and used oil filters. Used oil containing a PCB concentration equal or greater than 50 ppm shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
- (h) 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.

[Rules 62-4.070(3), 62-213.410, and 62-213.440, F.A.C.]

**A.5.2.0. Auxiliary Fuel Burners.** These devices shall be used at startup during the introduction of MSW fuel until design furnace gas temperature is achieved. They shall be fueled only with distillate fuel oil or natural gas. If the annual capacity value for distillate fuel oil or natural gas is greater than 10%, as determined by 40 CFR 60.43b(e), the facility shall be subject to 40 CFR 60.44b, Standards for Nitrogen Oxides.

[Rules 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C.; and, PSD-FL-129]

**A.5.3.0. Operating Temperature.** The furnace mean temperature at the fully mixed zones of the combustors shall not be less than 1,800° F. This corresponds to a minimum flue gas temperature of 673° F, as determined from a March 7, 1991 testing and modeling report.

[Rules 62-4.070(3), 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C.; and, PSD-FL-129]

**A.6. Hours of Operation.** These emissions units are allowed to operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.; and, PSD-FL-129]

### **Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.7. Visible Emissions.** The emission limit for opacity exhibited by the gases discharged to the atmosphere is 15 percent (6-minute average).

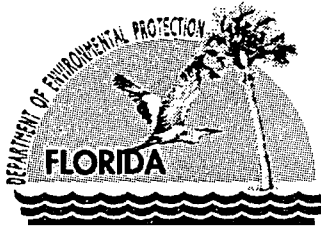
[PSD-FL-129]

**A.8. Particulate Matter.** The emission limit for particulate matter (PM) contained in the gases discharged to the atmosphere is 0.03 gr/dscf, corrected to 12 percent carbon dioxide.

[40 CFR 60.52; and, PSD-FL-129]

{Permitting note: The averaging time for this condition is based on the run time of the specified test method.}

**A.9. PM and PM<sub>10</sub>.** Flue gas emissions for PM and PM<sub>10</sub> shall not exceed the following:



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

October 8, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. C. Travis Windham, P.E.  
Director, Bay County Public Utilities  
3410 Transmitter Road  
Panama City, Florida 32404

Re: Applicable Requirements  
Bay County Waste-to-Energy Facility  
Facility ID No.: 0050031

Dear Mr. Windham:

Thank you for providing the 111(d) Compliance Schedule's "Final Control Plan" for your facility, which we received on September 12, 2002. Now, we are in need of some additional information from you to address the applicable NESHAP regulations that are applicable to the Bay County facility.

The facility's initial Title V Permit was issued/effective on August 2, 2000. On December 6, 2000, the regulations at 40 CFR Part 60, Subpart BBBB, Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or before August 30, 1999, became applicable to your facility. Since the additional applicable requirements became applicable to your facility and there is more than 3 (three) years left on your permit as of the effective date of the new regulations, the Department is required to open your Title V Permit for cause and install these requirements in accordance with Rules 62-4.080(1) and 62-213.430(4), F.A.C., and 40 CFR 70.7(f). In order to incorporate the specific applicable requirements of 40 CFR Part 60, Subparts A and BBBB, into your Title V Permit, please provide the specific rule cites of these applicable regulations for your facility and affected emissions units.

If there are any questions, please give Bruce Mitchell a call at 850/413-9198.

Sincerely,

A handwritten signature in black ink that reads "Scott M. Sheplak".

Scott M. Sheplak, P.E.  
Program Administrator  
Title V Section

"More Protection, Less Process"

Printed on recycled paper.



**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. C. Travis Windham, P.E.  
 Director, Bay County Public  
 Utilities  
 3410 Transmitter Road  
 Panama City, Florida 32404

2. Article Number (Copy from service label)  
 7000 0600 0021 6524 2908

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *DeAnna Battin* B. Date of Delivery *10/9/02*

C. Signature  
 X *DeAnna L. Battin*  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

7000 0600 0021 6524 2908

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

Article Sent To:  
 Mr. Travis Windham, P.E.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

Name (Please Print Clearly) (to be completed by mailer)  
 Mr. Travis Windham, P.E.  
 Street, Apt. No., or PO Box No.  
 3410 Transmitter Road  
 City, State, ZIP+4  
 Panama City, Florida 32404



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

September 13, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. C. Travis Windham, P.E.  
Director, Bay County Public Utilities  
3410 Transmitter Road  
Panama City, Florida 32404

RE: Request for Approval of a Segregated Bulk Waste Material  
Bay County Resource Recovery Facility  
0050031-002-AV

Dear Mr. Windham:

The Department has evaluated Mr. Chalmous Beechem's letter received August 29<sup>th</sup>, which requested approval of a consolidated bulk waste material (labeled as carpet manufacturing remnants – cushion tile products) to be incinerated at the Bay County Resource Recovery Facility as a segregated waste. Based on a review of the request, we do not feel that this waste stream is acceptable. Because the material contains styrene and butadiene, which are hazardous air pollutants, we have concerns about the products of incomplete combustion from the incineration of this material. Once the additional control systems have been installed by November 15, 2005, and operational, then this material can be re-evaluated for acceptability, if requested.

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,

A. A. Linero, P.E.  
Bureau of Air Regulation

AAL/rbm

cc: Chalmous Beechem, Montenay Bay LLC  
Scott Sheplak, BAR  
Sandra Veazey, NWD

*"More Protection, Less Process"*

*Printed on recycled paper.*

- 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. C. Travis Windham, P.E.  
 Director, Bay County Public  
 Utilities  
 3410 Transmitter Road  
 Panama City, Florida 32404

2. Article Number (Copy from service label)

7000 0600 0021 6524 3103

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

DeAnna Batten 9-16-02

C. Signature

X DeAnna Batten  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

PS Form 3800

Domestic Return Receipt

102593 00-1A-00

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

Article Sent To:

Mr. C. Travis Windham, P.E.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. C. Travis Windham, P.E.

Street, Apt. No., or PO Box No.

3410 Transmitter Road

City, State, ZIP+4

Panama City, Florida 32404

PS Form 3800, July 1999

See Reverse for Instructions

7000 0600 0021 6524 3103



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

August 29, 2002

Mr. Travis Windham, P.E.  
Director of Utility Services  
Bay County Board of County Commissioners  
Montenay Bay, LLC  
3410 Transmitter Road  
Panama City, Florida 32404

Re: Section 111(d) Compliance Schedule Progress

Dear Mr. Windham:

Please refer to the attached Compliance Schedule that applies to the municipal waste combustion units at your facility (ID. No. **0050031**). This Compliance Schedule is a requirement of Rule 62-204.800(8)(e), F.A.C. The first Increment of Progress scheduled event, Submit Final Control Plan, was due on September 30, 2001. Please provide us a copy of this Final Control Plan submission as soon as possible.

Sincerely,

for Scott M. Sheplak, P.E.  
Administrator  
Title V Section

Attachment

## Source Inventory

The two sources in Florida that are subject to 40 CFR 60, Subpart BBBB, are the following. Both sources have valid air operating permits. Each facility has two SMWC units.

1. Bay County Resource Recovery Facility, Panama City (Class I).
2. Southernmost Waste-to-Energy Facility, City of Key West (Class II).

## Compliance Schedules and Increments of Progress

All affected SMWCUs shall comply with all the requirements of Rule 62-204.800(8)(e), F.A.C., and achieve final compliance or cease operation as expeditiously as practicable but not later than the earlier of (1) December 6, 2005, or (2) three years after the effective date of State Plan approval by the EPA. The individual compliance schedules for meeting increments of progress and achieving final compliance, as outlined in each facility's final control plan, are given below.

**Table 1. Increments of Progress**

Increments of Progress	Source	
	Bay County	Southernmost
Submit Final Control Plan	09/30/01	09/30/01
Award Contracts	05/01/04	09/30/02
Begin Onsite Construction	06/01/04	05/31/03
Complete Onsite Construction	07/15/05	12/01/03
Achieve Final Compliance	11/15/05	03/01/04

## Emissions Limits and Inventory

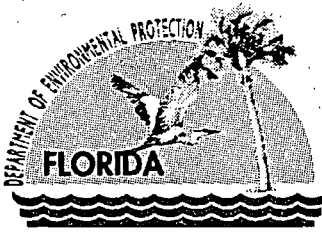
Table 2 is a summary list of the applicable emission limiting standards for all SMWCUs subject to 40 CFR 60, Subpart BBBB.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PROPOSED SECTION 111(d) STATE PLAN**



**SMALL MUNICIPAL WASTE COMBUSTION UNITS  
November 29, 2001**

*Florida Department of Environmental Protection • Division of Air Resources Management  
2600 Blair Stone Road • MS 5500  
Tallahassee, Florida 32399-2400 • (850) 488-0114*



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

August 27, 2002

CERTIFIED MAIL - Return Receipt Requested

Mr. C. Travis Windham, P.E.  
Director, Bay County Public Utilities  
3410 Transmitter Road  
Panama City, Florida 32404


RE: Request for Approval of a Segregated Bulk Waste Material  
Bay County Resource Recovery Facility  
0050031-002-AV

Dear Mr. Windham:

The Department has evaluated Mr. Chalmous Beechem's letter received August 13<sup>th</sup>, which requested approval of a consolidated bulk waste material (labeled as off-spec/returned consumer packaged pharmaceuticals) to be incinerated at the Bay County Resource Recovery Facility as a segregated waste. Based on a review of the request, we feel that the waste stream is permitted to be incinerated under Specific Conditions A.5.1.8.(c), of the above referenced permit. Please note that the waste stream shall not exceed 5%, by weight, of the facility's total fuel; and, compliance with this limitation shall be determined by using a rolling 30-day average.

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,

*for* 

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/rbm

cc: Chalmous Beechem, Montenay Bay LLC  
Scott Sheplak, BAR  
Sandra Veazey, NWD

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**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. C. Travis Windham, P.E.  
 Director, Bay County Public  
 Utilities  
 3410 Transmitter Road  
 Panama City, Florida 32404

2. Article Number (Copy from service label)

7000 0600 0021 6524 3240

PS Form 3811, July 1999

Domestic Return Receipt

02507 10-00-05

**RECEIVER: COMPLETE THIS SECTION**

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

DeAnna Batten

C. Signature

X DeAnna Batten

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)

042E 4259 1200 0090 0007  
7000 0600 0021 6524 3240

Article Sent To:

Mr. C. Travis Windham, P.E.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. C. Travis Windham, P.E.

Street, Apt. No., or PO Box No.

3410 Transmitter Road

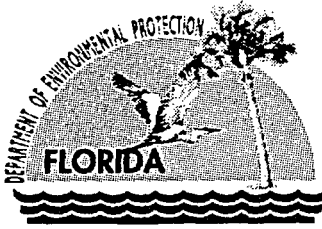
City, State, ZIP+4

Panama City, Florida 32404

PS Form 3800, July 1999

See Reverse for Instructions





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

August 7, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. C. Travis Windham, P.E.  
Director, Bay County Public Utilities  
3410 Transmitter Road  
Panama City, Florida 32404

RE: Request for Approval of a Segregated Bulk Waste Material  
Bay County Resource Recovery Facility  
0050031-002-AV

Dear Mr. Windham:

The Department has evaluated Mr. Chalmous Beechem's letter received July 29<sup>th</sup>, which requested approval of a consolidated bulk waste material (labeled as oil absorbent material) to be incinerated at the Bay County Resource Recovery Facility as a segregated waste. Based on a review of the request, a call was made to the Buckeye Florida LP's mill, located in Perry, Florida, where the waste stream was generated; and, it was found that the material is dewatered bleached wood pulp that was contaminated from a ruptured line of the paper machine lubricating oil and is a one-time generated waste that is being stored for shipment to an acceptable site for destruction. Therefore, we feel that the waste stream is permitted to be incinerated under Specific Conditions A.5.1.1. and A.5.1.8.(f), of the above referenced permit. Please note that the waste stream shall not exceed 5%, by weight, of the facility's total fuel; and, compliance with this limitation shall be determined by using a rolling 30-day average.

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,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/rbm

cc: Chalmous Beechem, Montenay Bay LLC  
Scott Sheplak, BAR  
Sandra Veazey, NWD

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Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

August 5, 2002

CERTIFIED MAIL – Return Receipt Requested

Ms. Joy Bates  
Interim County Manager  
Bay County Board of County Commissioners  
310 West 6<sup>th</sup> Street  
Panama City, Florida 32401

RE: Request for Approval of a Segregated Bulk Waste Material  
Bay County Resource Recovery Facility  
0050031-002-AV

Dear Ms. Bates:

The Department has evaluated Mr. Chalmous Beechem's letter received July 29<sup>th</sup>, which requested approval of a consolidated bulk waste material (labeled as used oil filters that have been crushed) to be incinerated at the Bay County Resource Recovery Facility as a segregated waste. Based on a review of the request, we feel that the waste stream is permitted to be incinerated under Specific Conditions A.5.1.8.(g), of the above referenced permit. Please note that the waste stream shall not exceed 5%, by weight, of the facility's total fuel; and, compliance with this limitation shall be determined by using a rolling 30-day average.

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,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/rbm

cc: Chalmous Beechem, Montenay Bay LLC  
Scott Sheplak, BAR  
Sandra Veazey, NWD

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**SENDER: COMPLETE THIS SECTION**

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- 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:  
 Ms. Joy Bates  
 Interim County Manager  
 Bay County Board of County Commissioners  
 310 West 6th Street  
 Panama City, Florida 32401

2. Article Number (Copy from service label)  
 7000 0600 0021 6524 3417

PS Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *CLARK* B. Date of Delivery *8-6-02*

C. Signature *Mary C. Clark*  Agent  Addressee

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

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

4. Restricted Delivery? (Extra Fee)  Yes

Domestic Return Receipt

7000 0600 0021 6524 3417

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

Article Sent To:  
 Ms. Joy Bates

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark Here

Name (Please Print Clearly) (to be completed by mailer)  
 Ms. Joy Bates  
 Street, Apt. No., or PO Box No.  
 310 West 6th Street  
 City, State, ZIP+4  
 Panama City, Florida 32401

PS Form 3800, July 1999 See Reverse for Instructions

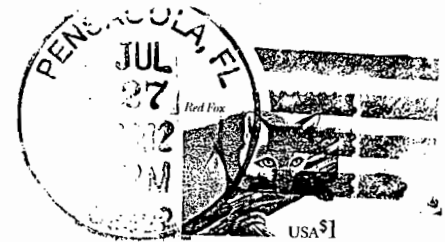
**MONTENAY BAY LLC**



6510 Bayline drive  
Panama City, Florida 32404

*Brice Fri S.A.H*

Attn: Mr. Clair Fancy  
Florida DEP, Bureau of Air Regulation  
Twin Towers Office Building  
Mail Station 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399



32399+6342 01



# **MONTENAY BAY LLC**



**RECEIVED**

**JUL 29 2002**

**BUREAU OF AIR REGULATION**

MBLLC/DEP-02-085

July 26, 2002

Mr. Clair Fancy  
Florida DEP, Bureau of Air Regulation  
Twin Towers Office Building  
Mail Station 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**SUBJECT:** Waste Approval Consideration  
Title V FINAL Permit No.: 0050031-002-AV  
Approval number 00202

Dear Mr. Fancy:

Per a telephone conversation with Bruce Mitchell , I am submitting for consideration a waste stream consisting of used oil filters, per section A.5.1.8.(g) of permit, processed by Merrifield Recycling of Cottondale, Fl. Amount delivered would be six tons per month, 72 tons per year, if approved. Enclosed, please find five pages of additional information.

Please contact me at (850) 785-7933, x206 if you need further assistance.

Sincerely,

  
Chalmous Beechem  
Operations Manager

cc Bruce Mitchell, FLDEP

Onyx Specialty Waste Services, Inc. (OSWS) , Material Profile Form (MPF).

Material Profile Form # (Shaded areas are for OSWS use only) Initiation Date: / / Page 1 of 3.

Customer Code: Generator Code: Billing Code: Approval Code(s):
OSWS Initiator: Disposal Location(s): Waste Processing Code(s):

1.0 GENERATOR INFORMATION:
1. Generator Company Name: Merrifield Recycled Oil (MRO)
2. Address: 3053 Barneslane 3. City: Cottondale 4. State: FL 5. Zip: 32431
6. Contact Name: Jim Merrifield
7. Tel #: 850-352-1044 8. Fax #: 850-352-4088 9. E-Mail ID #: Merrifield\_C@HotMail.com
10. Generator EPA ID #: (If multiple locations exist please attach relevant information)

2.0 CUSTOMER BILLING INFORMATION:
1. Company Name: MRO
2. Address: P.O. Box 550
City: Cottondale
3. State: FL 4. Zip: 32431
5. Billing Contact Name: Jim Merrifield
6. Billing Contact Title: owner
7. Tel #(s): (850) 352-1044
8. Fax #(s): (850) 352-4088
9. E-Mail ID #: Merrifield\_C@HotMail.com
10. Federal Tax ID # for Billing Purposes:

3.0 PICK UP LOCATIONS:
will deliver
If same as in Section 1.0 please check here
1. Company Name:
2. Shipping Address:
3. City: 4. State: 5. Zip:
6. Shipping Contact(s):
7. Tel #(s) ( )
8. Fax #(s) ( )
9. E-Mail ID #: @
10. If multiple locations please attach a list

4.0 THIRD PARTY AUTHORIZATION: (if appropriate please complete below)
I as an authorized representative of (Generator Company)
authorize of (Service Company / Broker) to
act as a third party or agent of the Generator. This is an authorization to complete all required paperwork and to supply all necessary backup
Documentation to accurately profile the generator waste for disposal at the appropriate disposal facility.

5.0 MATERIAL PROFILE FORM CHANGE AUTHORIZATION: (if appropriate please complete below)

I, as the generator, authorize Onyx Specialty Waste Services, Inc. to make corrections to this Material Profile Form. I understand that a fully
corrected copy of the Material Profile Form will be returned to me for my records.
If authorization is or is not granted please check the appropriate box and initial. [X] Yes [ ] No gm Initials

6.0 REGULATORY WASTE INFORMATION:
A. [X] Yes [ ] No This waste is R.C.R.A. Non Hazardous
B. [ ] Yes [X] No Regulated or Licensed Radioactive Waste
C. [ ] Yes [X] No Medical / Infectious or Chemotherapeutic Waste
D. [ ] Yes [X] No OSHA Carcinogens (outline in waste constituents)
E. [ ] Yes [X] No Regulated Benzene NESHAP Waste
F. [ ] Yes [X] No Asbestos Containing Waste
G. [ ] Yes [X] No Dioxin or Furan bearing Waste
H. [ ] Yes [X] No Any type of PCB Waste
I. [ ] Yes [X] No Explosivos / Shock Sensitive
J. [ ] Yes [X] No Polymerizable Material
K. [ ] Yes [X] No Air / Water Reactive
L. [ ] Yes [X] No Oxidizer / Reducer
M. [ ] Yes [X] No Total Cyanide ppm
N. [ ] Yes [X] No Total Sulfide ppm
O. Other applicable

Montenay / Onyx Specialty Waste Services, Inc. (OSWS), Material Profile Form (MPF)  
 Material Profile Form # \_\_\_\_\_ Page 2 of 3.

7.0 Material or Waste Specific Information: (Attach additional pages and MSDS)

1. Material or Waste Name: used oil filters  
 2. Process or Material or Waste generation: oil recycling operation  
 3. Total Quantity of Material / Waste: 6 ton month (Circle) Avs (Tons / pallets / drums / other: Explain)  
 4. Frequency of shipment: Daily  Weekly  Monthly  Yearly  One time

8.0 COMPOSITION & PROPERTIES OF MATERIAL / WASTE

Chemical Name / Component / Formula	Material / Waste Analysis (Wt. %)	Material / Waste Ranges (Wt. %)
1. _____	_____	_____
2. <u>used oil filters / crushed</u>	_____	<u>100 %</u>
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____
6. _____	_____	_____
7. _____	_____	_____
8. _____	_____	_____
9. _____	_____	_____
10. _____	_____	_____

(Total must be greater than or equal to 100 %)

See attached sheets and MSDS for chemical description, chemical constituents, alternate names / synonyms and chemical formulae.

9.0 MATERIAL / WASTE PROPERTIES AT ROOM TEMPERATURE:

1. Physical State and % of each state  Liquid \_\_\_\_\_ %  Sludge / Semi-solid \_\_\_\_\_ %  Solid 100 %  Powder \_\_\_\_\_ %  Gas \_\_\_\_\_ %  
 2. Odor oil (Describe) 3. Color varies (Describe) 4. No. of Phases: \_\_\_\_\_ Viscosity  High  Med  Low  
 6. Flash Point (Liquids & Non-liquids)  < 100°F  100° - 130°F  140° - 199°F  ≥ 200°F. Check if material is solid   
 7.  pH (Aqueous liquids) or  pH (Non aqueous)  ≤ 2.0  > 2.0 ≤ 5.0  > 5.0 ≤ 8.9  > 9.0 ≤ 12.49  ≥ 12.5  
 8. Corrosivity  ≤ 6.35 mm/yr or  > 6.35 mm/yr 9. Melting Point of Solids ≤ 130°F. Compared to \_\_\_\_\_  
 10. Boiling Point of Liquids  < 130°F \_\_\_\_\_ °F. 11. Ignition Temp. \_\_\_\_\_ °F. 12. TOC (Total Organic Carbon)  < 1%  1-20%  > 20%  
 13. BROMINE  None or \_\_\_\_\_ % 14. IODINE  None or \_\_\_\_\_ % 15. FLUORINE  None or \_\_\_\_\_ % 16. CHLORINE  None or \_\_\_\_\_ %  
 17. VOC (Volatile Organic Compounds) \_\_\_\_\_ % 18. Higher Heating Value (BTUs/LB) 10,000  Estimated  Exact 19. Ash: \_\_\_\_\_ %  
 20. SULFUR 0 % 21. NITROGEN 0 % 22. Specific Gravity \_\_\_\_\_ or Bulk Density \_\_\_\_\_ LB/GAL.  
 23. Free liquids present  Yes  No. 24. Free liquids are fully absorbed  Yes  No. Absorbent type \_\_\_\_\_ and \_\_\_\_\_ %  
 25. Analytical is attached  Yes  No. TCLP  Total Metals  Flash Pt.  BTU/lb  Wt % Halogen / Sulfur



BEST AVAILABLE COPY

Montenay / Onyx Specialty Waste Services, Inc. (OSWS), Material Profile Form (MPF)

Material Profile Form # \_\_\_\_\_

Page 3 of 3.

10.0 Packaging and Shipping Information (Outline the average container weights if applicable by the check-box)

<input type="checkbox"/> Consumer Packaged Returns	<input type="checkbox"/> Finished product bulk	<input type="checkbox"/> Fiber drums	<input type="checkbox"/> Roll-offs
<input type="checkbox"/> Consumer packaged - 500 lbs	<input type="checkbox"/> Intermittent waste	<input type="checkbox"/> Poly drums	<input type="checkbox"/> Dump-trailers
<input type="checkbox"/> Consumer packaged truckload	<input type="checkbox"/> Production Debris	<input type="checkbox"/> Steel drums	<input type="checkbox"/> Vac truck
<input type="checkbox"/> Raw material inert or active (100%)	<input type="checkbox"/> Mixed Powders	<input type="checkbox"/> Gaylords	<input type="checkbox"/> Walking trailer
<input type="checkbox"/> Plant Trash	<input type="checkbox"/> Paper waste	<i>dump truck (6 tons)</i>	

11.0 ELEMENTAL ANALYSIS OF MATERIAL / WASTE (TCLP and TOTAL METALS)

11.1 Permit Compliance Metals: (both Ash and Air permits) Units  mg/Kg (parts per million or PPM - AND- Units  mg/l TCLP for the RCRA 8 metals.

Aluminum _____ mg/kg	Chromium _____ mg/kg	Nickel _____ mg/kg
Antimony _____ mg/kg	Chromium VI _____ mg/kg	Selenium _____ mg/kg
Arsenic _____ mg/kg	Copper _____ mg/kg	Silver _____ mg/kg
Barium _____ mg/kg	Lead _____ mg/kg	Zinc _____ mg/kg
Beryllium _____ mg/kg	Mercury _____ mg/kg	Cadmium _____ mg/kg
Molybdenum _____ mg/kg	If none are present please check here. <input type="checkbox"/> None	

11.2 Additional Materials of concern to MSWS: Please verify if present and if so, give quantity and unit of measure.

Titanium \_\_\_\_\_ % Silicon \_\_\_\_\_ % Aluminum & Zirconium Salts \_\_\_\_\_ % Free Cyanides \_\_\_\_\_ ppm Free Sulfides \_\_\_\_\_ ppm  
 Free Ammonia \_\_\_\_\_ ppm Cresols \_\_\_\_\_ Total Formaldehyde \_\_\_\_\_ Chloroform \_\_\_\_\_  
 If none are present please check here.  None

11.3 Please check the appropriate box ( ) if the waste contains any of the following:

Aerosols <input type="checkbox"/>	Oil Contamination <input checked="" type="checkbox"/>	Teflon / PTFE <input type="checkbox"/>	FIFRA Regulated Pesticides <input type="checkbox"/>	Isocyanates <input type="checkbox"/>	Sharps <input type="checkbox"/>
Organic Solvent Contamination <input type="checkbox"/>	DEA Materials <input type="checkbox"/>	DOT Regulated Material <input checked="" type="checkbox"/>	Acrylates <input type="checkbox"/>		
Nicotine or salts <input type="checkbox"/>	Contaminated Empty Containers <input type="checkbox"/>	Fiberglass Waste <input checked="" type="checkbox"/>	Carbon and Carbon Filtration waste <input type="checkbox"/>		
Saccharin or salts <input type="checkbox"/>	Un-contaminated Empty Containers <input type="checkbox"/>	Leather Waste <input type="checkbox"/>	Paint / Varnish Contaminated waste <input type="checkbox"/>		
If none are present please check here.			None <input type="checkbox"/>		

12.0 GENERATOR CERTIFICATION (This section must be signed prior to the completion of any review)

I certify, as the generator, or, authorized representative of the generator, that the Material or Waste described in this Material Profile Form is NON-HAZARDOUS by all Federal, State and Local regulations. Furthermore, this information is complete and accurate to the best of my knowledge, no information about the Material or Waste composition or the known or potential hazards have been willfully omitted.

Generator Signature: James E. Merrifield Date: 5-29-02

Name & Title (Printed or Typed): James E. Merrifield, Owner



# HYGEIA LABORATORIES, INC.

1300 Williams Drive, Suite A - Marietta, Georgia 30066-6299 - (770) 514-6933, FAX (770) 514-6966

## ANALYTICAL REPORT

Client: **MRO**  
P.O. Box 550  
Cottondale, FL 32431

Attention: **Jim Merrifield**

Project Name: Oil from Automotive Oil Filter

Received: 6/18/02

Lab Project No. 41023

Report Date: 7/2/02

### CASE NARRATIVE

- 1 The holding time for all samples was met.
- 2 Where applicable, results & reporting limits are based on wet weight; dry weight calculations available.
- 3 The temperature of the sample received by the laboratory was room temperature.

Reviewed by: AWS *AWS*

Respectfully Submitted,

*Jim Merrifield*  
 \_\_\_\_\_  
 Hygeia Laboratories, Inc.

<u>LAB ID</u>	<u>CLIENT ID</u>	<u>MATRIX</u>	<u>COLLECTED</u>
300799	Oil from Automotive Oil Filter	OIL	6/14/02

Lab Project No. 41023

Report Date: 7/2/02

**Polychlorinated Biphenyls**

Matrix: Oil

Analysis Date:

Units: **mg/Kg (ppm)**Method: **EPA 8082**

7/1/02

Prep. Date:

7/1/02

Analyst: BG

Lab ID: 300799

Client ID: Oil from Automotive Oil Filter

Analyte	Result	RL
Aroclor-1016	BRL	5
Aroclor-1221	BRL	5
Aroclor-1232	BRL	5
Aroclor-1242	BRL	5
Aroclor-1248	BRL	5
Aroclor-1254	BRL	5
Aroclor-1260	BRL	5

**NOTES:**

- Results relate only to the samples tested as received (see chain-of-custody).
- BRL = "Below Reporting Limit"
- RL = "Reporting Limit"
- E = "Estimated"
- Dates are presented in the format "month/day/year"

**Certifications**

Alabama - Lab ID 40970; Arkansas; Connecticut - No. PH 0208; Delaware - GA040; Georgia - No. 804; Indiana - Lab ID C-GA-01  
 Kentucky - Lab ID 90053, UST - No. 0005; Louisiana; Maryland - No. 293; Massachusetts No. M - GA040; North Carolina - No. 409  
 Rhode Island, License No. 245; South Carolina - No. 98012001; Tennessee - Lab ID 02827; Virginia - Lab ID 00024

**Accreditations**

American Association for Laboratory Accreditation, A2LA - No. 330.01;  
 American Industrial Hygiene Association, AIHA - Lab ID 100649; NELAC - State of Florida DOH, No. E87257

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HP Fax Series 900  
Plain Paper Fax/Copier

Fax History Report for  
Montenay Bay LLC  
(850)784-1779  
Jul 10 2002 10:04am

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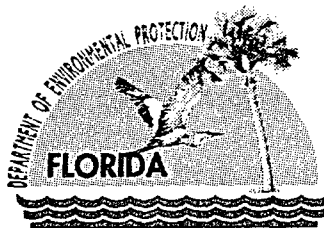
Last Fax

<u>Date</u>	<u>Time</u>	<u>Type</u>	<u>Identification</u>	<u>Duration</u>	<u>Pages</u>	<u>Result</u>
Jul 10	10:03am	Received	850 352 4088	0:58	3	OK

---

Result:

OK - black and white fax



# Department of Environmental Protection

Jeb Bush  
Governor

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

David B. Struhs  
Secretary

May 8, 2001

RECEIVED

MAY 11 2001

BUREAU OF AIR REGULATION

Jonathan A. Mantay  
Bay County Administrator  
310 W 6<sup>th</sup> St  
Panama city FL 32401

Dear Mr. Mantay:

A Department inspector conducted the annual air compliance inspection of the Bay Resource Management Center (air operation permit 0050031-002-AV) on March 2 and 13, 2001. A copy of the inspection report is enclosed.

The facility compliance status is "non-compliance" because the burners installed to ignite the waste during startup are not functioning. These burners are identified in the operating permit as well as in construction permits AC03-145061 and AC03-152196. Department staff participated in a teleconference with representatives of Montenay Bay on May 1, 2001. It was agreed that Montenay Bay will submit proposed language and supporting documentation to request a modification of the permit to allow removing the subject burners, and appropriate revision to the Title V operating permit.

If you have any questions or comments, please contact Andy Allen of this office at (850) 595-8364, extension 1223.

Sincerely,

Sandra F. Veazey  
Air Program Administrator

SFV:rbc

Enclosure

cc: Jerry Gross and Chalmous Beecham, Montenay Bay LLC  
Bill Hudson, Bay County  
Clair Fancy, P.E. and Scott Sheplak, P.E., FDEP Bureau of Air Regulation  
FDEP Northwest District Branch Office, Panama City

STW  
3/21/01  
CWS  
3/22/01

RECEIVED

MAR 19 2001

NORTHWEST FLORIDA  
DEP

**INSPECTION REPORT  
AIR POLLUTANT EMISSION SOURCES**

<b>FACILITY:</b> Bay County Incinerator 6510 Bayline Dr. Bay Industrial Park	<b>DISTRICT:</b> 10	<b>COUNTY:</b> 03
	<b>CONTACT:</b> Chalmous Beechem	
	<b>TELEPHONE:</b> (850) 785-7933 x206	

<b>AIRS ID#:</b> 0050031	<b>PERMIT#:</b> 0050031-002- AV	<b>EXPIRATION DATE:</b> 08/01/2005
--------------------------	------------------------------------	------------------------------------

<b>INSPECTION DATE</b> 03/02/2001 & 03/13/2001	<b>AUDIT TYPE</b> III	<b>COMPLIANCE STATUS</b> Non Compliance
<b>SKY</b> mostly clear	<b>WIND</b> 3-5 mph	<b>TEMPERATURE</b> mid 60s

**SOURCE DESCRIPTION:** Municipal Solid Waste Incinerator and Cogeneration Plant

**INSPECTION COMMENTS:**

I arrived at the facility and was greeted by Mr. Chalmous Beechem, Operations Manager. Mr. Beechem accompanied me on the inspection of the facility and provided copies of requested records. As this was the first inspection under the Initial Title V Air Operation Permit, a number of records were reviewed in detail.

There were no objectionable odors noticed during the inspection of the facility. Odor has improved since the facility began using "first-in, first out" on the tipping floor. *[Facility-Wide Condition 2]*

At no times during the inspections were visible emissions in excess of 20% opacity noticed. *[Facility-Wide Condition 3]*

The facility does not have a Risk Management Plan, nor is it required to have one. A Title V Statement of Compliance was filed with the Department. *[Facility-Wide Condition 4]*

VOC control appeared adequate. No open containers were noticed that were not in actual use. *[Facility-Wide Condition 6]*

Excessive fugitive dust was not noticed during this inspection. The facility owns and operates a street sweeper. Roads are swept weekly or as needed. All roads at the facility are now paved. *[Facility-Wide Condition 7.0, 7.1, & 7.2]*

A detailed review was performed of facility records showing hourly steam flow as well as both 4 and 24-hour averages. Both units were in compliance with the required 4-hour and 24-hour steam flow averages of 66,667 and 65,333. *[Specific Condition A.3.1]*

The required demonstration test has been performed and the results submitted to the Department. *[Specific Condition A.3.2.2]*

Steam flow meters are installed and calibrated as required. Copies of current calibration sheets are attached to this report. *[Specific Condition A.3.2.3]*

Computerized record keeping systems are used. Both 4-hour and 24-hour steam flow averages are calculated and tracked by the facility. *[Specific Condition A.3.2.4]*

The primary fuel for this facility is MSW with natural gas used for the auxiliary burners. The original diesel fuel burners were replaced last year. Specific Condition A.5.1.11 needs to be modified to reflect this change. *[Specific Condition A.5.1.1]*

The tipping floor was inspected. There was no unauthorized fuel noted. All fuel appeared to be well mixed during the time of this inspection. *[Specific Condition A.5.1.3 & A.5.1.4]*

The facility also uses computerized record keeping for fuel incoming. Reports are available for segregating the waste streams by originating locations and type. Attached to this report is an example of the information in this system. *[Specific Condition A.5.1.5]*

Records revealed 30-day averages for segregated loads of waste tires to be between 6 and 11 tons per day for the period August 2000 through February 2001. This is within the limit as specified in the permit. *[Specific Condition A.5.1.7]*

Records showed less than 4 tons per day of other specialty waste streams. This amount is within allowable limits. *[Specific Condition A.5.1.8]*

Auxiliary burners have been replaced as mentioned above. However, only the load burners were replaced. The ignition burners were not replaced and are still in a state of disrepair, and are not being used during startup of the facility. *[Specific Condition A.5.2.0]*

Flue gas temperature is monitored by the control system. Temperatures are recorded onto the daily log-sheets. The facility easily reaches the required temperature during normal operation. *[Specific Condition A.5.3.0]*

The facility performed the required annual emission testing and submitted the results to the Department. *[Specific Condition A.26]*

Visible emissions above 15% were not observed during the inspections. *[Specific Condition A.7]*

Steam production, furnace exit gas temperature (FEGT), and flue gas exit temperature are monitored as required. *[Specific Condition A.47]*


The units normally operate between 80% & 100% of design rated capacity, unless starting up, shutting down, or performing maintenance cleaning of the wind boxes. *[Specific Condition A.48]*

CEM's for opacity, oxygen and carbon monoxide are installed, maintained, and the results recorded as per permit conditions. Zero and span checks are performed and a log is maintained for downtime and maintenance reasons. *[Specific Condition A.49]*

Daily charging rates are recorded using steam flow as a surrogate parameter. The facility has no way to directly monitor charging rates of any specific fuel. Attached to this report are copies of emails between the facility and the Department concerning this matter. *[Specific Condition A.70 & A.71]*

**RECOMMENDATIONS:**

1. Apply for a permit modification/correction concerning allowable fuels and charging rate record keeping.
2. Repair or replace ignition burners and use them during startup operations.

INSPECTOR'S NAME	SIGNATURE	DATE
Richard S. Brookins Jr. Environmental Specialist		March 14, 2001

*CWS  
3/26/01*





BAY COUNTY ENERGY SYSTEMS, INC.

6510 Bay Line Drive  
 Panama City, Florida 32404  
 (904) 785-7933  
 (904) 784-1779 Fax

TRANSMITTER  
 CALIBRATION SHEET

INST # FT 152A S/N 827434

DESCRIPTION BLA #1 Steam Flow

MFG ROSEMOUNT  OTHER

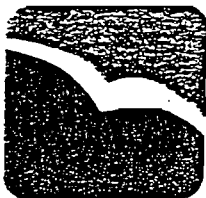
CAL RANGE 0 - 300 INHG INWC PSI

INPUT	As Found	OUTPUT	As Left
<u>0</u>	<u>4.02</u>		
<u>75</u>	<u>8.00</u>		<u>CP</u>
<u>150</u>	<u>11.99</u>		<u>CP</u>
<u>225</u>	<u>16.02</u>		<u>CP</u>
<u>300</u>	<u>20.03</u>		

0 = 4.00	0 = 4.00	0 = 4.00
33 = 9.33	25 = 8.00	20 = 7.20
66 = 14.66	50 = 12.00	40 = 10.40
100 = 20.0	75 = 16.00	60 = 13.60
	100 = 20.0	80 = 16.80
		100 = 20.0

REMARKS

Calibrated By: [Signature] Date 01/26/01



# BAY COUNTY ENERGY SYSTEMS, INC.

5510 Bay Line Drive  
Panama City, Florida 32404  
(904) 785-7933  
(904) 784-1779 Fax

## TRANSMITTER CALIBRATION SHEET

INST # FT 152-A S/N 827434

DESCRIPTION BLR # 1 Steam Flow

MFG ROSEMOUNT OTHER \_\_\_\_\_

CAL RANGE 0 - \_\_\_\_\_ INHG 300 INWC \_\_\_\_\_ PSI

INPUT	As Found	OUTPUT	As Left
<u>0</u>	<u>3.98</u>		
<u>75</u>	<u>8.01</u>		
<u>150</u>	<u>12.01</u>		
<u>225</u>	<u>16.03</u>		
<u>300</u>	<u>20.05</u>		

*Same*

0 = 4.00	0 = 4.00	0 = 4.00
33 = 9.33	25 = 8.00	20 = 7.20
66 = 14.66	50 = 12.00	40 = 10.40
100 = 20.0	75 = 16.00	60 = 13.60
	100 = 20.0	80 = 16.80
		100 = 20.0

REMARKS

Calibrated By [Signature]

Date OCT-4-2000



# BAY COUNTY ENERGY SYSTEMS, INC.

6510 Bay Line Drive  
Panama City, Florida 32404  
(904) 785-7933  
(904) 784-1779 Fax

## TRANSMITTER CALIBRATION SHEET

INST # FT 152B S/N 827435

DESCRIPTION RLR #2 Steam Flow

MFG \_\_\_\_\_ ROSEMOUNT  OTHER \_\_\_\_\_

CAL RANGE 0 - \_\_\_\_\_ INHG 200 INWC \_\_\_\_\_ PSI

INPUT	As Found	OUTPUT	As Left
<u>0</u>	<u>4.00</u>		<u>1</u>
<u>75</u>	<u>7.99</u>		<u>5</u>
<u>150</u>	<u>11.98</u>		<u>8</u>
<u>225</u>	<u>16.02</u>		<u>12</u>
<u>300</u>	<u>20.01</u>		<u>16</u>

0 = 4.00

0 = 4.00

0 = 4.00

33 = 9.33

25 = 8.00

20 = 7.20

66 = 14.66

50 = 12.00

40 = 10.40

100 = 20.0

75 = 16.00

60 = 13.60

100 = 20.0

80 = 16.80

100 = 20.0

REMARKS

Calibrated By Deanna Whitfield

Date 01/26/01



# BAY COUNTY ENERGY SYSTEMS, INC.

6510 Bay Line Drive  
Panama City, Florida 32404  
(904) 785-7933  
(904) 784-1779 Fax

## TRANSMITTER CALIBRATION SHEET

INST # ET1523 S/N 887435

DESCRIPTION BLR # 2 Steam Flow

MFG \_\_\_\_\_ ROSEMOUNT \_\_\_\_\_ OTHER \_\_\_\_\_

CAL RANGE 0 - \_\_\_\_\_ INHG 300 INWC \_\_\_\_\_ PSI

INPUT	As Found	OUTPUT	As Left
<u>0</u>	<u>3.97</u>		
<u>75</u>	<u>7.97</u>		
<u>150</u>	<u>11.98</u>		
<u>225</u>	<u>16.00</u>		<u>same</u>
<u>300</u>	<u>20.03</u>		

0 = 4.00	0 = 4.00	0 = 4.00
33 = 9.33	25 = 8.00	20 = 7.20
66 = 14.66	50 = 12.00	40 = 10.40
100 = 20.0	75 = 16.00	60 = 13.60
	100 = 20.0	80 = 16.80
		100 = 20.0

REMARKS

Calibrated By [Signature]

Date OCT-07-2000

## Jerry Gross

---

**From:** Jerry Gross [jgross@montenaybay.com]  
**Sent:** Wednesday, August 09, 2000 10:54 AM  
**To:** Tom Cascio TAL 850/488-1344  
**Subject:** RE: Final Title V Permit Questions

**Sensitivity:** Confidential

Tom,

Thanks for responding so quickly to my questions. I failed to provide you with enough information about my concerns with Condition A.71. Condition A.71 requires that I maintain daily records of "(a)The total tons of waste charged to each combustor, (b)the charging rates of wood waste, (c)the charging rates of waste tires, (d)the charging rate of non-MSW material listed in Specific Condition A.5.1.8, and (e)the fuel oil and natural gas quantities utilized during startup and shutdown of operations.". The requirement for maintaining records of the amount of fuel oil and natural gas used, operationally, is not a problem. The flow rates of oil or natural gas are easily measured. However, as for the solid fuels, MSW, wood, tires, and non-MSW, measuring feed rates is not practical. For this reason steam flow is used as an indicator of feed rate as allowed in Condition A.3.1 "To determine compliance with the maximum charging capacity, the steam flow meter shall be calibrated, maintained, and operated...". Using steam flow as an indicator of feed rate and meeting the requirements of Conditions A.3.2.3 through A.3.2.9 would give us a practical means for complying with part (a) of Condition A.71. As for part (b), (c), and (d) the same problems arise with measuring feed rates, additionally Condition A.5.1.4 requires that these fuels be "well mixed with MSW on the tipping floor; or alternately charged with MSW in the hopper.". Operationally, it is essential that these fuels be mixed with MSW prior to feeding into the combustor. However, Conditions A.5.1.1, A.5.1.7, and A.5.1.8 require that I maintain daily records of the amounts of wood, tires, and non-MSW delivered to the facility. Since, these fuels will be well mixed with MSW and, on average, the same amounts will be feed into each combustor, it follows that meeting the Requirements of Conditions A.5.1.1, A.5.1.7, and A.5.1.5 would in essence meet the requirements of part (b), (c), and (d) of Condition A.72. If this does not sound like a reasonable approach please let me know.

Thank You

Jerry

> -----Original Message-----

> From: Tom Cascio TAL 850/488-1344 [mailto:Tom.Cascio@dep.state.fl.us]

> Sent: Wednesday, August 09, 2000 9:15 AM

> To: Jerry Gross

> Subject: Re: Final Title V Permit Questions

> Sensitivity: Confidential

>

>

> Jerry:

>

> Talked to Bruce about Question 1. The opacity standard is what

> is specified in

> Specific Condition A.7.

>

> For Question 2 (reference is A.71?), the condition means to maintain all

> necessary records (logs, spreadsheets, etc.).

>

> Tom

>

> Tom

>

## Jerry Gross

---

**From:** Tom Cascio TAL 850/488-1344 [Tom.Cascio@dep.state.fl.us]  
**Sent:** Tuesday, August 15, 2000 10:18 AM  
**To:** Jerry Gross  
**Subject:** Re: Final Title V Permit Questions

**Sensitivity:** Confidential

Jerry:

Received your question on Specific Condition A.71. I'll talk to Bruce and will try to get back to you shortly with an answer.

Tom

## Jerry Gross

---

**From:** Tom Cascio TAL 850/488-1344 [Tom.Cascio@dep.state.fl.us]  
**Sent:** Wednesday, August 16, 2000 10:12 AM  
**To:** Jerry Gross  
**Subject:** Re: Final Title V Permit Questions

**Sensitivity:** Confidential

Jerry:

I talked further with Bruce on your question. The intent of Specific Condition A.71. is to assure that the quantities and composition of all fuels and materials received and eventually burned at the facility, on a daily basis, are in accordance with the terms and conditions of the permit. Thus "charging rates" in A.71. should be interpreted in this manner. We understand the dilemma of calculating feed rates of individual components of well-mixed materials prior to feeding into a combustor. We will write an Administrative Correction (Permitting note) to the permit to clarify this. Thanks for your inquiry and concern. Hope this helps.

Tom

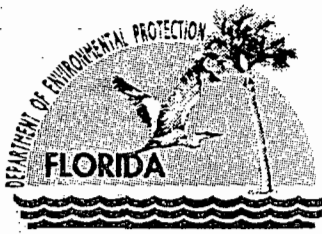
Date	Hour	Steam2	Hr4	Hr24r	UNIT 2
02/23/2001	100	63.674	0.000	0.000	
02/23/2001	200	64.991	0.000	0.000	
02/23/2001	300	64.502	0.000	0.000	
02/23/2001	400	64.443	64.403	0.000	
02/23/2001	500	64.867	0.000	0.000	
02/23/2001	600	64.651	0.000	0.000	
02/23/2001	700	64.669	0.000	0.000	
02/23/2001	800	65.006	64.798	0.000	
02/23/2001	900	55.124	0.000	0.000	
02/23/2001	1000	64.944	0.000	0.000	
02/23/2001	1100	65.187	0.000	0.000	
02/23/2001	1200	64.645	62.475	0.000	
02/23/2001	1300	65.291	0.000	0.000	
02/23/2001	1400	65.317	0.000	0.000	
02/23/2001	1500	65.106	0.000	0.000	
02/23/2001	1600	65.141	65.214	0.000	
02/23/2001	1700	64.738	0.000	0.000	
02/23/2001	1800	64.934	0.000	0.000	
02/23/2001	1900	64.728	0.000	0.000	
02/23/2001	2000	65.134	64.884	0.000	
02/23/2001	2100	63.909	0.000	0.000	
02/23/2001	2200	64.747	0.000	0.000	
02/23/2001	2300	64.795	0.000	0.000	
02/23/2001	2400	64.436	64.472	64.374	
02/24/2001	100	64.515	0.000	0.000	
02/24/2001	200	64.794	0.000	0.000	
02/24/2001	300	64.279	0.000	0.000	
02/24/2001	400	63.372	64.240	64.347	
02/24/2001	500	63.353	0.000	0.000	
02/24/2001	600	62.660	0.000	0.000	
02/24/2001	700	63.239	0.000	0.000	
02/24/2001	800	64.576	63.457	64.124	
02/24/2001	900	65.144	0.000	0.000	
02/24/2001	1000	64.938	0.000	0.000	
02/24/2001	1100	64.829	0.000	0.000	
02/24/2001	1200	64.731	64.911	64.530	
02/24/2001	1300	64.934	0.000	0.000	
02/24/2001	1400	65.035	0.000	0.000	
02/24/2001	1500	64.510	0.000	0.000	
02/24/2001	1600	65.857	65.084	64.508	
02/24/2001	1700	64.701	0.000	0.000	
02/24/2001	1800	67.378	0.000	0.000	
02/24/2001	1900	59.757	0.000	0.000	
02/24/2001	2000	62.829	63.666	64.305	
02/24/2001	2100	63.999	0.000	0.000	
02/24/2001	2200	64.092	0.000	0.000	
02/24/2001	2300	64.744	0.000	0.000	
02/24/2001	2400	64.182	64.254	64.269	
02/25/2001	100	63.856	0.000	0.000	
02/25/2001	200	63.992	0.000	0.000	
02/25/2001	300	63.638	0.000	0.000	
02/25/2001	400	64.543	64.007	64.230	
02/25/2001	500	64.365	0.000	0.000	
02/25/2001	600	64.609	0.000	0.000	
02/25/2001	700	64.044	0.000	0.000	
02/25/2001	800	64.322	64.335	64.376	
02/25/2001	900	64.886	0.000	0.000	
03/02/2001	Page 1	67.378	65.214	64.530	



**BEST AVAILABLE COPY**

01/29/2001	608.74	2.88	0.00	567.37	0.00	19.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.43	0.00	14.66	0.00	0.00
01/30/2001	698.26	1.47	0.00	585.24	0.00	17.92	0.00	14.39	30.12	0.00	0.00	0.00	0.00	8.75	27.69	15.62	0.00	0.00
01/31/2001	417.26	12.14	0.00	367.26	0.00	18.91	0.00	0.00	32.14	0.00	0.00	0.00	0.00	11.09	0.00	0.00	0.00	0.00
02/01/2001	481.21	0.42	0.00	406.28	0.00	24.87	0.00	0.00	31.70	0.00	0.00	0.00	0.00	0.00	0.00	18.78	0.00	0.00
02/02/2001	546.80	5.52	0.00	449.66	0.00	22.40	0.00	0.00	31.29	0.00	0.00	0.64	0.00	11.28	0.00	14.61	22.44	0.00
02/03/2001	133.85	16.06	0.00	149.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
02/05/2001	709.14	0.04	0.00	617.85	0.00	24.61	0.00	0.00	16.35	0.00	0.00	0.00	0.00	11.77	0.00	0.00	20.55	18.05
02/06/2001	619.70	1.73	0.00	488.53	0.00	0.00	0.00	7.10	25.83	0.00	0.00	0.00	0.00	12.20	34.08	14.70	38.99	0.00
02/07/2001	439.58	8.46	0.00	363.23	0.00	48.48	0.00	0.00	31.37	0.00	0.00	4.96	0.00	0.00	0.00	0.00	0.00	0.00
02/08/2001	497.20	2.53	0.35	433.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.15	42.23	14.81	0.00	0.00
02/09/2001	688.03	6.21	0.00	481.56	0.00	39.62	0.00	0.00	65.38	0.00	0.00	0.00	0.00	0.00	0.00	7.62	100.06	0.00
02/10/2001	120.67	23.24	0.00	126.07	0.00	0.00	0.00	0.00	17.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
02/12/2001	703.22	1.98	0.00	626.42	0.00	22.26	0.00	9.61	0.00	0.00	0.00	0.00	0.00	22.52	17.89	6.50	0.00	0.00
02/13/2001	682.49	2.59	0.00	515.72	0.00	23.18	0.00	0.00	29.55	0.00	0.00	0.07	0.00	0.00	19.90	20.24	76.42	0.00
02/14/2001	555.26	7.32	0.00	378.78	0.00	10.83	0.00	7.37	29.89	0.00	0.00	6.02	0.00	10.10	71.59	0.00	48.00	0.00
02/15/2001	570.96	0.72	0.42	447.67	0.00	24.47	0.00	0.00	30.83	0.00	0.00	0.00	0.00	0.00	0.00	26.83	41.88	0.00
02/16/2001	595.51	1.96	0.00	452.32	0.00	23.97	0.00	0.00	29.70	0.00	0.00	0.00	0.00	10.27	60.71	20.50	0.00	0.00
02/17/2001	249.30	20.45	0.00	205.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	63.78	0.00	0.00	0.00
02/21/2001	558.99	6.43	0.00	390.03	0.00	12.13	0.00	0.00	28.02	0.00	0.00	0.00	0.00	0.00	101.46	9.36	22.40	2.02
02/19/2001	830.98	1.72	0.00	573.34	0.00	21.88	0.00	0.00	30.38	0.00	0.00	0.00	0.00	9.82	170.42	26.86	0.00	0.00
02/22/2001	598.66	0.18	0.00	422.18	0.00	23.32	0.00	0.00	29.45	0.00	0.00	0.26	0.00	10.99	84.75	7.84	21.11	0.00
02/23/2001	664.82	1.45	0.00	502.77	0.00	17.46	0.00	0.00	28.99	0.00	0.00	0.00	0.00	0.00	87.11	13.58	16.36	0.00
02/24/2001	275.50	22.90	0.00	167.31	0.00	0.00	0.00	0.00	15.43	0.00	0.00	0.00	0.00	0.00	94.72	0.00	20.94	0.00
02/26/2001	943.12	3.77	0.25	690.43	0.00	41.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22.76	191.20	1.04	0.00	0.00
02/27/2001	832.36	2.65	0.00	636.62	0.00	20.49	0.00	0.00	43.42	0.00	0.00	0.00	0.00	9.17	106.29	19.02	0.00	0.00
02/28/2001	524.88	10.00	0.00	375.81	0.00	20.31	0.00	0.00	30.61	0.00	0.00	0.00	0.00	0.00	108.15	0.00	0.00	0.00
02/28/2001	484.88	5.49	0.03	380.73	0.00	15.92	0.00	1.28	20.28	0.00	0.00	0.40	0.00	5.68	42.73	8.42	14.31	0.67

BLR1		BLR2		BOP		TURBINE/GENERATOR	
68	STM FLOW, KLB	67		HP HDR PRES, PSI	596	STM TO TURB, KLB	1
644	DRUM PRES, PSI	654		MP HDR PRES, PSI	161	STM INLET, F	7
0.3	DRUM LVL, IN	0.6		LP HDR PRES, PSI	24	TURB PRES, PSI	5
750	BLR TEMP, F	748		PCV 100, %	0	TG LUBE OIL, F	1
-0.34	DRAFT, INWC	-0.23		INHOUSE FLW, KLB	0	TG LUBE OIL LVL	OK
1760	CIRC FLW, GPM	1899		FEED PRES, PSI	736	DC LUBE OIL PMP	0
27.4	RAM SPD, %	30.3		FEED TEMP, F	343	TURB EXH TMP, F	1
3.6	COMB SPD, RPH	<b>-7.5</b>		PRES DIFF, PSI	82	VACUUM, INHG	27
58.2	FW FLOW, KLB	60.0		DA LEVEL, IN	0.5	HOTWELL, IN	0
RUN	LOAD CONV	RUN		DA TEMP, F	258	COND PRES, PSI	1
RUN	INCLINE CONV	RUN		DEMIN LVL, FT	24.9	COND FLW, GPM	2
CONV1	BIFURCATOR	CONV1		INST AIR, PSI	91	COND STM TMP, F	1
<b>ON</b>	SIFT CONV	<b>ON</b>		CT BASIN LVL, IN	0.2	POWER FACTOR	-1
<b>ON</b>	RESIDUE CONV	OFF		CCW LVL, IN	0.2	PLANT LOAD, KVR	10
114	CO, PPM	47		CCW TEMP, F	88	MEGAWATTS	12
				CW SUPPLY, F	89	PLANT LOAD, KWH	13
3.4	OXYGEN, %	6.2		CW RETURN, F	104	NET PWR OUT, MW	10
9.2	OPACITY, %	0.9		CW, pH	7.3	NET PWR OUT AVG	10
0.0	C MIN AVG, %	1.1					



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

May 7, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Jon Mantay  
County Administrator  
Bay County Board of County Commissioners  
310 West 6<sup>th</sup> Street  
Panama City, Florida 32401

RE: Request for Approval of a Segregated Bulk Waste Material  
Bay County Resource Recovery Facility  
0050031-002-AV

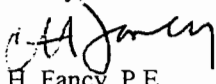
Dear Mr. Mantay:

The Department has evaluated Mr. Chalmous Beechem's letter received May 4, which requested approval of a consolidated bulk waste material (labeled as TSDf consolidated waste) to be incinerated at the Bay County Resource Recovery Facility as a segregated waste. Based on a review of the request, we feel that the waste stream is not permitted to be incinerated under Specific Conditions A.5.1.6. and A.5.1.8.

Further consideration for approval of these materials as a method of operation will be given upon receipt of a formal request. This request shall include an application, with signature from the Responsible Official and seal of a registered Florida P.E., ultimate analysis of the subject material, projected potential emissions of any pollutants (criteria and HAPs) as a result of both complete and incomplete combustion/incineration, and any other pertinent material and data, including calculations, assumptions and reference material.

If there are any questions, please give Mr. Bruce Mitchell a call at 850/921-9506 or write to me at the above letterhead address.

Sincerely,

  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/rbm

cc: Chalmous Beechem, Montenay Bay LLC  
Scott Sheplak, BAR  
Sandra Veazey, NWD  
Martha Nebelsiek, Esq., DEP

5/8/01 cc: Reading File  
Tom Cascio

"More Protection, Less Process"

**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. Jon Mantay  
 County Administrator  
 Bay County Board of  
 County Commissioners  
 310 West 6th Street  
 Panama City, Florida 32401

2. Article Number (Copy from service label)  
 7099 3400 0000 1449 5236

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Yolonda Kelley* B. Date of Delivery *5-9-01*

C. Signature *Yolonda Kelley*  Agent  Addressee

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

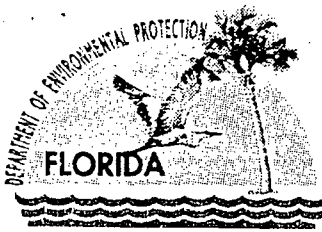
3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To: Mr. Jon Mantay	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>
Name (Please Print Clearly) (to be completed by mailer) Mr. Jon Mantay	
Street, Apt. No., or PO Box No. 310 West 6th Street	
City, State, ZIP+4 Panama City, Florida 32401	
PS Form 3800, July 1999	See Reverse for Instructions

7099 3400 0000 1449 5236

Postmark  
 Here



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

April 3, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Jon Mantay  
County Administrator  
Bay County Board of County Commissioners  
310 West 6<sup>th</sup> Street  
Panama City, Florida 32401

RE: Request for Approval of Segregated Bulk Waste Materials  
Bay County Resource Recovery Facility  
0050031-002-AV

Dear Mr. Mantay:

The Department has evaluated Mr. Chalmous Beechem's letters received February 19 and 20, 2001, which requested approval of several (10) segregated bulk waste materials to be incinerated at the Bay County Resource Recovery Facility. Based on a review of the requests, we feel that the following segregated bulk waste materials are currently permitted to be incinerated under Specific Conditions A.5.1.4. thru A.5.1.8., and subject to the feed rate percentages defined within the Specific Conditions, e.g., 3% and 5%, by weight.:

1. Shurtape Adhesive Tape Scraps
2. Kimberly Clark Diaper Scraps
3. Avery and Dennison Paper Label Scraps
4. International Garbage from Tyndall AFB (segregated overseas garbage)
5. Waste Tires
6. Bausch and Lomb Eye Drops (off-spec, recalled and outdated cosmetics and pharmaceuticals)
7. Aaron Oil Company (used oil filters and cleanup brooms and swabs)
8. Hawaiian Tropic Tanning Products (off-spec, recalled and outdated cosmetics and pharmaceuticals)

The Department feels that the following two segregated bulk waste materials are currently not permitted to be incinerated under Specific Conditions A.5.1.4. thru A.5.1.8.:

1. Eastman Kodak Plastic Resins
2. Clorox "Combat" Roach Bait

Further consideration for approval of these materials as a method of operation will be given upon receipt of a formal request. This request shall include an application, with signature from the Responsible Official and seal of a registered Florida P.E., ultimate analysis of the subject material, projected potential emissions of any pollutants (criteria and HAPs) as a result of both complete and incomplete combustion/incineration,

*"More Protection. Less Process"*

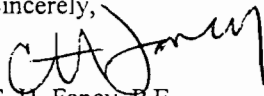
*Printed on recycled paper.*

Mr. Jon Mantay  
Bay County Board of County Commissioners  
Bay County RRF: Request for Approval of Segregated Bulk Waste Materials  
0050031-002-AV  
Page 2 of 2

and any other pertinent material and data, including calculations, assumptions and reference material.

If there are any questions, please give Mr. Bruce Mitchell a call at 850/921-9506 or write to me at the above letterhead address.

Sincerely,



C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/rbm

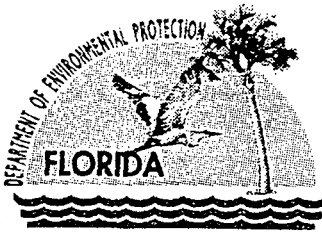
cc: Chalmous Beechem, Montenay Bay LLC  
Scott Sheplak, BAR  
Sandra Veazey, NWD  
Martha Nebelsiek, Esq., DEP

4/5/01 cc: Reading File  
Bruce Mitchell  
mailed on 4/5/01 (Certified)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)	B. Date of Delivery
	<p><i>Yolanda Kelley</i>      <i>4/9/01</i></p>	
1. Article Addressed to:  Mr. Jon Mantay County Administrator Bay County Board of County Commissioners 310 West 6th Street Panama City, Florida 32401	C. Signature	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
	<p><i>X Yolanda Kelley</i></p>	
2. Article Number (Copy from service label) 7099 3400 0000 1449 5113	D. Is delivery address different from item 1?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If YES, enter delivery address below:	
PS Form 3811, July 1999	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.
	4. Restricted Delivery? (Extra Fee)	<input type="checkbox"/> Yes
Domestic Return Receipt		102595-99-M-1789

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		
Article Sent To:		
Mr. Jon Mantay		
Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	
Name (Please Print Clearly) (to be completed by mailer)		
Mr. Jon Mantay		
Street, Apt. No., or PO Box No.		
310 West 6th Street		
City, State, ZIP+4		
Panama City, Florida 32401		
PS Form 3800, July 1999		See Reverse for Instructions

7099 3400 0000 1449 5113



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 2, 2001

Mr. Chalmous Beechem  
Operations Manager  
Montenay Bay LLC  
6510 Bayline Drive  
Panama City, FL 32404

Re: Mercury Tilt Switch  
Bay Resource Management Center

Dear Mr. Beechem:

We have reviewed your request to employ a mercury-type tilt switch at the Bay County facility. However, since the switch in question is "totally encapsulated", and thus cannot emit any mercury emissions to the atmosphere, Departmental approval is not required for this implementation.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section



# MONTENAY BAY LLC



MBLLC/056-DEP

March 28, 2001

Mr. Clair Fancy  
Florida DEP, Bureau of Air Regulation  
Twin Towers Office Building  
Mail Station 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Waste Stream Approval

Dear Mr. Fancy,

As the result of the issuance of a Title V permit our facility is now required to submit waste stream approval request to your department. In a correspondence dated February 15<sup>th</sup> and 19<sup>th</sup> 2001, we submitted information on ten separate waste streams that had historically been processed at the facility. The Pensacola regional office had previously approved five of these waste streams, four were MSW like material, which fell into the new category of segregated loads and as such required approval. To date we have not received a response on any of these waste streams. The facility relies on these waste streams to supplement MSW deliveries, specifically during months of low MSW deliveries, April being one of these months.

We are asking for your assistance in expediting the approval process. We would be happy to provide any additional information you may need. We are anticipating a reduction in the amount of MSW delivered to the facility during the month of April. Should we be unable to accept at least some of the waste submitted for approval, we fear that the facility will be required to shut down at least part of each week during the month. Should your department have concerns with one or more of the waste streams, it would be very helpful if they can be set aside temporarily and the remaining waste streams be approved.

Once again thank you for your assistance.

Sincerely,

Jerry Gross  
Facility Manager

cc: Bill Hudson - Bay County Waste Department

RECEIVED  
MAR 30 2001  
BUREAU OF AIR REGULATION

Sho Scott  
Pls handle

**MONTENAY BAY LLC**



RECEIVED

MAR 13 2001

BUREAU OF AIR REGULATION

MBLLC/DEP-01-050

March 9, 2001

Mr. Clair Fancy  
Florida DEP, Bureau of Air Regulation  
Twin Towers Office Building  
Mail Station 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJECT: Feedchute Tilt Switch  
Title V FINAL Permit No.: 0050031-002-AV

Dear Mr. Fancy:

In a recent discussion with William Lefler I mentioned that we were considering the use of a mercury type tilt switch in our feedchutes, as an emergency conveyor shutoff in the event that the normal level system should fail. The tilt switch would shut the conveyor off if level in the feedchute was too high, to prevent plugging the feedchute.

I asked Mr. Lefler if formal approval was necessary for this device since it contained mercury. He recommended sending the information, attached, about this device to you for consideration.

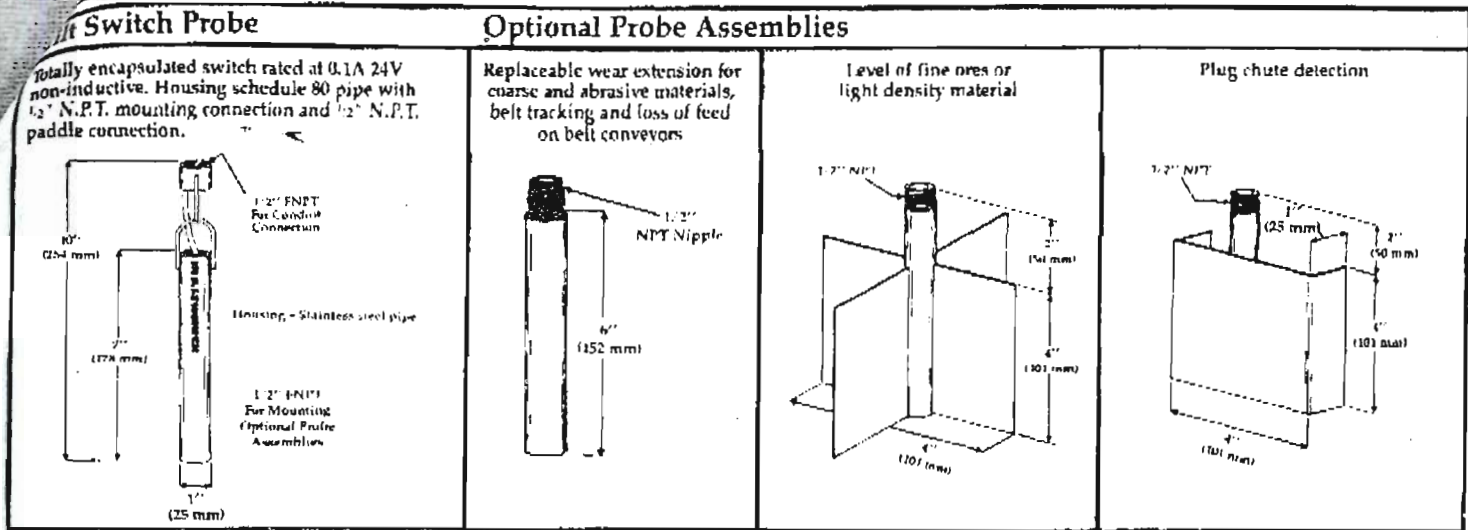
If I may be of any further assistance, please feel free to contact me at (850) 785-7933, x206.

Sincerely,

Chalmous Beechem  
Operations Manager

BEST AVAILABLE COPY

# Tilt Switches



## Specifications:

### FEATURES:

- Number of points: single point level detection
- Number of alarms: 1 failsafe alarm
- Outputs: 2 form "C" relay output contacts; LED relay status indicators
- Transducers: tilt angle sensitive mercury contacts
- Variable alarm delay to reduce false indications
- Switch selectable NC or NO (on energization) input contact for failsafe operation

### CHARACTERISTICS

- Electronics
- Display: LED alarm indication
- Input Impedance: 75K Ohms max. for closed contact
- Response time delay: adjustable from 0.2 to 10 sec.
- Temperature Range of Operation: -40° to 60°C (-40° to 140°F)
- Power supply requirements: 105 to 120 VAC, 60 HZ, 5 VA

### PROBE

- Resolution: nominal 15° from vertical
- Totally encapsulated mercury switch rated at 24 & 120 V non-inductive
- Housed in schedule 80 steel pipe with 1/2" NPT mounting for extensions

### OPTIONS

- Probes: Normal probe plated steel
- low temp. -40 to 90°C (-40 to 194°F)
- high temp. -40 to 230°C (-40 to 450°F)

Stainless Steel  
Probe extensions

low temp/high temp  
plated stainless steel

### APPLICATIONS

- Point level detection
- Plugged chute detection
- Belt tracking
- Feed loss detection on belt conveyors
- Use on dry bulk materials such as coal, bulk petro-chemicals, animal feeds

### APPROVALS

- Safe Tilt Switch
- FM approved for intrinsically safe Class I, II, III, Div. 1, Group A, B, C, D, E, & F
- Contact Sensor ISCS
- FM & CSA approved for intrinsically safe Class I, II, III, Div. 1, Group A, B, C, D, E, F & G
- Safe Tilt Switch Enclosure
- FM approved for Class II, III, Div. 1, Group E, F & G

### PHYSICAL DESCRIPTION

- NEMA 4 & 9 enclosure, painted steel, 169 mm x 222 mm x 102 mm (6.63 x 75 x 3.68 in.)
- weight of electronics and enclosure - 3.2 Kg (7 lbs)
- The probe is available in plated or stainless steel for either standard or high temperature environments.

Specifications subject to change without notice

All Probes Includes 20' cable



1954 Technology Dr., P.O. Box 4225, Peterborough, Ontario, Canada K0J 7H1 Tel: 705-745-2431  
 Oak House, Bromyard Road, Worcester, England WR2 5XZ Tel: 01905-749404  
 709 Stadium Drive, Arlington, Texas U.S.A. 76011 Tel: 817-277-3543  
 Other subsidiaries & sales offices in France, The Netherlands, Belgium and Mexico. A joint venture in Singapore and distributors in 51 countries. 35752504 US 35752500 CN 35752501 A4 17

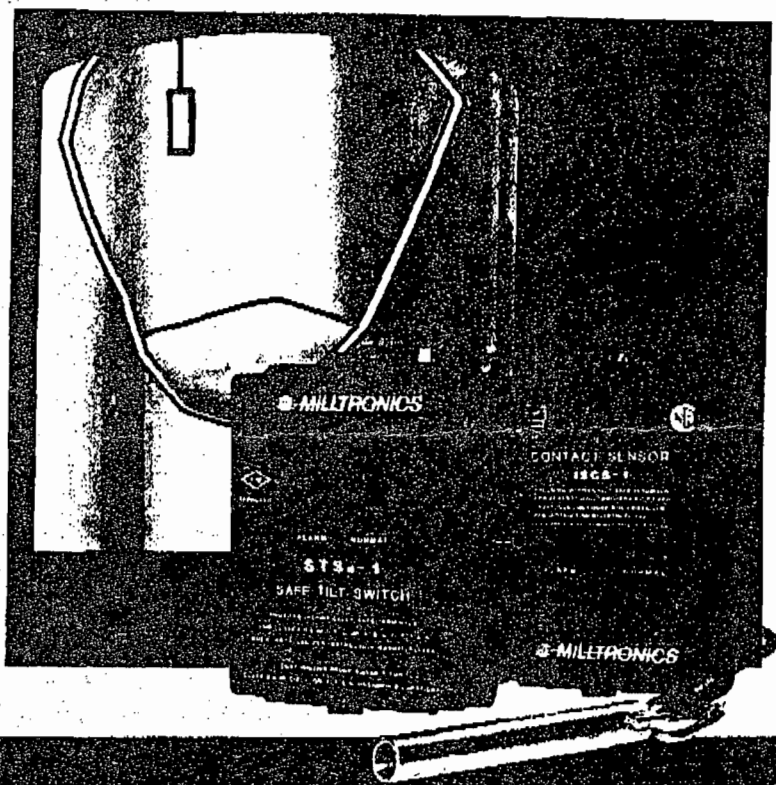


Internet: <http://www.milltronics.com>

Printed in Canada

# Tilt Switches

- Low Cost
- Easy Installation
- High/low alarm



## Purpose

Use Milltronics Tilt Switches for inexpensive:

- point level control
- plug chute detection
- belt tracking
- feed loss detection on belt conveyors

Whenever simple high or low alarm action is required, Milltronics Tilt Switches offer an effective solution. They provide simple monitoring of dry bulk solids and liquids in

a variety of environments. Designed for use even in hazardous rated areas, they carry FM and/or CSA approvals. Installation is quick and easy due to the simple design, and operation is straightforward. To extend the range of uses, Milltronics offers optional probe assemblies including:

- replaceable wear extension
- flat paddle or cross paddle for medium bulk density materials
- float for liquids or light density bulk materials.

## How it Works

The Tilt Switch consists of a rugged, totally encapsulated probe and an electronic amplifier. In operation, the Tilt Switch is suspended vertically within a bin or over a belt. A switch is potted within the probe to provide a signal when material tilts the probe more than 15° in any direction.

The amplifier provides a relay output, as well as an adjustable time delay to ignore spurious contact openings. The enclosure has two LED indication lights; green/normal and red/alarm. The operation manual details possible variations in service.

**Sheplak, Scott**

**From:** Moose Beechem [cbeechem@montenaybay.com]  
**Sent:** Monday, January 29, 2001 11:07 AM  
**To:** Sheplak, Scott  
**Subject:** Title V Permit No. 0050031-002-AV

Mr. Sheplak,

My name is Chalmous Beechem. I am the Operations Manager at the Bay Resource Management Center, the municipal waste incinerator in Bay County. Jerry Gross, Facility Manager, and I would like to meet with you for a few minutes on Monday February 5, 2001, if your schedule permits, to discuss our Title V permit. A letter that we recently received, signed by Sandra Veazey, NW district Air Program Administrator, lists you as the contact person for issues relating to waste materials. We would like to make sure that we are properly interpreting certain conditions relating to various waste streams, some of which we have been receiving for several years. We would also like to discuss the proper procedure for seeking approval of waste material in general. You may reply via e-mail or you may call 850-785-7933x206.

Thank You  
C. Beechem

Bruce,  
Can you make  
this? Scott  
1/29

I have not  
responded yet.

Does he want to come  
here? If so, Ed should  
probably be present.

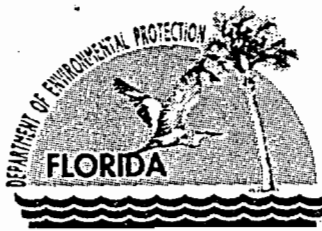
Owner does not want to burn  
wants a letter from us that they  
can't burn.

Hazardous waste?

Sandra has MSDS sheets

No air pollution controls.

No one showed up for the meeting. Scott  
2/6



Jeb Bush  
Governor

# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

David B. Struhs  
Secretary

January 24, 2001

RECEIVED

JAN 29 2001

BUREAU OF AIR REGULATION

Mr. Jonathan A. Mantay  
Bay County Administrator  
310 West 6<sup>th</sup> Street  
Panama City FL 32401

Dear Mr. Mantay:

Re: Bay Resource Management Center Air Pollution Permit (0550031-002-AV)

The Department issued a Title V Air permit to Bay County for the operation of the municipal waste incinerators at Bay Resource Management Center on August 1, 2000. The permit specifically limits the type of waste that may be incinerated to municipal solid waste unless prior written permission has been obtained from the Department [Conditions A.5.1.1 and A.5.1.8 (h)]. Burning waste material that is not specifically authorized by the permit, including waste generated from manufacturing, agricultural or industrial activities, is considered a change in method of operation that may require a modification to the construction permit and public notice. Any request to burn any unauthorized waste should be submitted to the Bureau of Air Regulation, the office that originally issued the permit. The address is:

Scott Sheplak  
Title V Section, Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Our records currently list you as the Responsible Official for Bay Resource Management Center. Condition # 37 of the Title V General Conditions requires that any application form, report, compliance statement, compliance plan and compliance schedule submitted to the Department shall contain a certification signed by the responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

If you have any questions please contact me at (850) 595-8364, extension 1225.

Sincerely,

Sandra F. Veazey  
Air Program Administrator

SFV:csw

Enclosure

cc: Jerry Gross, Montenay Bay, LLC  
Chalmous Beechem, Montenay Bay, LLC  
Bill Hudson, Bay County  
Clair Fancy, P.E., Bureau of Air Regulation, DEP  
✓ Scott Sheplak, P.E., Bureau of Air Regulation, DEP  
Northwest District Branch Office, DEP

"More Protection, Less Process"

**Mitchell, Bruce**

---

**From:** Hernandez, Henry  
**Sent:** Thursday, January 18, 2001 4:53 PM  
**To:** Salmon, Carolyn; Allen, Andy; Mitchell, Bruce; Brookins, Richard; Hughes, Debbie  
**Subject:** FW: Combat roach bait products

For your information

Henry Hernandez, Environmental Manager  
FDEP-NWD Panama City Branch Office  
Office 850-872-4375 x112  
Suncom 777-4375 x112  
Fax 850-872-7790

-----Original Message-----

**From:** Moose Beechem [mailto:cbeechem@montenaybay.com]  
**Sent:** Thursday, January 18, 2001 3:32 PM  
**To:** Hernandez, Henry  
**Subject:** Combat roach bait products

Due to the reaction of the FLDEP personnel I have instructed the operations personnel to push the load of Combat/Maxforce products to the side and not burn it until I get a chance to discuss the issue further with someone from the department. One option would be to load it up and send it back, but a more practicle solution may be to burn very small amounts over a long time period. I apologize for my interpetation of the permit and any confusion it may have caused. I will be much more careful in the future. As we disussed earlier on the phone, a statement on department letterhead stating that this material is unacceptable would be greatly appreciated, to go a step further I would also appreciate it if you would include a clause stating that no bulk shipments of any kind will be accepted if they contain insecticide of any concentration.

Thank You  
Moose Beechem

## Mitchell, Bruce

---

**From:** Hernandez, Henry  
**Sent:** Thursday, January 18, 2001 4:35 PM  
**To:** Allen, Andy; Mitchell, Bruce; Salmon, Carolyn  
**Cc:** Hughes, Debbie; Brookins, Richard; McNulty, Jack  
**Subject:** Bay County Incinerator Test Burn

I had a talk with Moose Beechum of Bay Co incinerator. They tried to do the test burn but had difficulty in handling the waste as it is packaged. I informed Moose that the Department did not approve of burning these "roach motels". He sounded relieved, he said they prefer not to handle it anyway. There were two products called Combat and Max Force. They have received approximately 11 tons for testing and were expecting up to 100 tons per year to burn after that. I explained our concerns and he would like a letter from someone in the Agency that essentially tells them they can not burn that product. He says he needs the letter in order to have something in writing to show why he is refusing the waste. In a phone conversation with Carolyn we came to the consensus that we need something in writing from Montenay informing us of the material they wish to burn with information on what the material is so that we can send them a response. Debbie Hughes of my Office gave me a series of MSDS sheets with a cover letter that she received from Montenay concerning this test burn. I will fax Carolyn a copy and see if this is enough to send out a response to the Company. Moose said that he is looking at a waste stream called TSD, he sent the information to Richard about it. Moose said it was an oily product. Carolyn is aware of it however we still haven't made a determination on whether it can be burned or not at the Bay County Incinerator. Carolyn and I will put together an email to Jerry Gross, plant manager for Montenay, in order to let him know of our concerns and some other concerns we have about the corrective actions they have completed for the past violations we discovered. We will keep everyone informed.

Thanks to everyone for their quick response,

Henry Hernandez, Environmental Manager  
FDEP-NWD Panama City Branch Office  
Office 850-872-4375 x112  
Suncom 777-4375 x112  
Fax 850-872-7790



## Mitchell, Bruce

---

**From:** Hernandez, Henry  
**Sent:** Thursday, January 18, 2001 2:38 PM  
**To:** Mitchell, Bruce; Allen, Andy; Salmon, Carolyn; Bradburn, Rick  
**Cc:** Veazey, Sandra; Brookins, Richard; Hughes, Debbie  
**Subject:** RE: HAZARDOUS WASTE ?????

I will look further into it and get with you on my findings.

Thanks all for the input,

Henry Hernandez, Environmental Manager  
FDEP-NWD Panama City Branch Office  
Office 850-872-4375 x112  
Suncom 777-4375 x112  
Fax 850-872-7790

-----Original Message-----

**From:** Mitchell, Bruce  
**Sent:** Thursday, January 18, 2001 12:34 PM  
**To:** Allen, Andy; Salmon, Carolyn; Bradburn, Rick  
**Cc:** Hernandez, Henry; Veazey, Sandra  
**Subject:** RE: HAZARDOUS WASTE ?????

1/18/2001

I concur with the response from Andy. The facility is not permitted to burn the proposed waste stream.

Bruce Mitchell  
851/921-9506 or SC: 291-9506

-----Original Message-----

**From:** Allen, Andy  
**Sent:** Thursday, January 18, 2001 9:34 AM  
**To:** Salmon, Carolyn; Bradburn, Rick  
**Cc:** Hernandez, Henry; Mitchell, Bruce; Veazey, Sandra  
**Subject:** HAZARDOUS WASTE ?????

HENRY,

This email copy just arrived. Bay county has a Title V permit issued by Tallahassee that is pretty clear on what they can burn. Concentrated pesticides does not seem appropriate. You should discuss this issue with Bruce Mitchell.

Thanks,  
Andy

-----Original Message-----

**From:** Salmon, Carolyn  
**Sent:** Wednesday, January 17, 2001 8:50 AM  
**To:** Allen, Andy; Bradburn, Rick  
**Subject:** FW:

-----Original Message-----

**From:** Hernandez, Henry  
**Sent:** Wednesday, January 17, 2001 8:29 AM  
**To:** McNulty, Jack; Salmon, Carolyn  
**Cc:** Brookins, Richard; Hughes, Debbie  
**Subject:**

Debbie got a call from Moose Beechum, Bay County Incinerator. They are planning a test burn today on Roach Motel kind of waste. Sounds like pesticides to me. Debbie is looking over the SW permit. Richard is not in yet but I will discuss with him when he comes in. Jack, Carolyn, have either one of you had experience with burning pesticides? What are the concerns with this type of burn? Debbie is planning to be there when they burn. When the ash is tested before landfilling will the tests show problems if there are any with this type of burn? What are the concerns with emissions as far as the emissions standards are concerned? Food for thought.

Henry Hernandez, Environmental Manager  
FDEP-NWD Panama City Branch Office  
Office 850-872-4375 x112  
Suncom 777-4375 x112  
Fax 850-872-7790

## Mitchell, Bruce

---

**From:** Allen, Andy  
**Sent:** Thursday, January 18, 2001 9:34 AM  
**To:** Salmon, Carolyn; Bradburn, Rick  
**Cc:** Hernandez, Henry; Mitchell, Bruce; Veazey, Sandra  
**Subject:** HAZARDOUS WASTE ?????

HENRY,

This email copy just arrived. Bay county has a Title V permit issued by Tallahassee that is pretty clear on what they can burn. Concentrated pesticides does not seem appropriate. You should discuss this issue with Bruce Mitchell.

Thanks,  
Andy

-----Original Message-----

**From:** Salmon, Carolyn  
**Sent:** Wednesday, January 17, 2001 8:50 AM  
**To:** Allen, Andy; Bradburn, Rick  
**Subject:** FW:

-----Original Message-----

**From:** Hernandez, Henry  
**Sent:** Wednesday, January 17, 2001 8:29 AM  
**To:** McNulty, Jack; Salmon, Carolyn  
**Cc:** Brookins, Richard; Hughes, Debbie  
**Subject:**

Debbie got a call from Moose Beechum, Bay County Incinerator. They are planning a test burn today on Roach Motel kind of waste. Sounds like pesticides to me. Debbie is looking over the SW permit. Richard is not in yet but I will discuss with him when he comes in. Jack, Carolyn, have either one of you had experience with burning pesticides? What are the concerns with this type of burn? Debbie is planning to be there when they burn. When the ash is tested before landfilling will the tests show problems if there are any with this type of burn? What are the concerns with emissions as far as the emissions standards are concerned? Food for thought.

Henry Hernandez, Environmental Manager  
FDEP-NWD Panama City Branch Office  
Office 850-872-4375 x112  
Suncom 777-4375 x112  
Fax 850-872-7790



Jeb Bush  
Governor

*Barbara / File*

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Certified Mail -- Return Receipt Requested

David B. Struhs  
Secretary

December 20, 2000

Mr. Chalmous Beechem  
Operations Manager  
Montenay Bay LLC  
6510 Bayline Drive  
Panama City, Florida 32404

Re: Revision to FINAL Title V Permit No. 0050031-002-AV  
Bay Resource Management Center

Dear Mr. Beechem:

Your letter to Al Linero on this subject was referred to this section for response. The requested change of auxiliary fuel use from distillate fuel oil to natural gas will require an air construction permit (AC) to implement. However, we must deem your application incomplete due to the following reasons:

1. Please submit your application using the proper Department form No. 62-210.900(1). The form is available on the Department's Internet web site: [www.dep.state.fl.us/air](http://www.dep.state.fl.us/air). Only those pages reflecting the changes to your original Title V application need to be submitted. However, the submission needs to include the certification page with the signature of the Responsible Official of the facility.
2. Rule 62-4.050(3), F.A.C., requires that all original applications for a Department permit and requests for permit revision must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please ensure that the completed application is so certified. Please also include documentation describing the affect of the requested change on air pollution emissions at the facility, due to the switch to natural gas for auxiliary firing in the startup burners.

Please also note that we are advising applicants that Rule 62-4.055(1), F.A.C., requires a response to requests for information within 90 days. When we receive the above mentioned items, we will continue processing your application. If you have questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section

cc: Andy Allen, NWD

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)	B. Date of Delivery 12/21/00
1. Article Addressed to:  <b>MR CHALMOUS BEECHEM            OPERATIONS MANAGER            MONTENAY BAY LLC            6510 BAYLINE DR.            PANAMA CITY, FL 32404</b>	C. Signature <input checked="" type="checkbox"/> <i>James McAllister</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
2. Article Number (Copy from service label) <b>3 210 660 449</b>	D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:	
PS Form 3811, July 1999	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.	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
Domestic Return Receipt <span style="float: right;">102595-99-M-1789</span>		

Z 210 660 449

US Postal Service  
**Receipt for Certified Mail**  
 No Insurance Coverage Provided.  
 Do not use for International Mail (See reverse)

MR CHALMOUS BEECHEM  
 OPERATIONS MANAGER  
 MONTENAY BAY LLC  
 6510 BAYLINE DR.  
 PANAMA CITY, FL 32404

Certified Fee	
Special Delivery Fee	
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	12-20-00 Sgh

PS Form 3800, April 1995

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 15-Aug-2000 09:52am

**From:** Tom Cascio TAL  
CASCIO\_T

**Dept:** Air Resources Management

**Tel No:** 850/488-1344

**To:** vikingsword@juno.com

**CC:** Scott Sheplak TAL

( SHEPLAK\_S )

**CC:** Andy Allen PEN

( ALLEN\_A @ A1 @ DEPPNS )

**Subject:** BAY COUNTY INCINERATOR DERATING

General Peterson:

Please see the attached response to your recent inquiry on this subject.

Tom Cascio

**DRAFT**

Mr. Carl D. Peterson  
Major General USAF Retd.  
Panama City, Florida

Dear Mr. Peterson:

The following comments are responses to the questions in your recent e-memorandum to Mr. Bobby Cooley, concerning the Bay Resource Management Center facility. The document was forwarded to our office for reply.

***1. What is the final permit rating and when was it issued?***

The FINAL Title V Air Operation Permit for the Bay Resource Management Center was issued on August 2, 2000. It contains the following Specific Condition concerning the final permit rating:

**A.3.1. Capacity.**

(a) The maximum charging rate of each of the two MWC's shall not exceed 245 tons of municipal solid waste (MSW) per day (a total of 490 tons per day for the facility). The maximum heat input rate shall not exceed 91.875 MMBtu per hour, assuming a heating value of 4,500 Btu per pound. Steam flow rate shall not exceed an average of 65,333 lbs/hr 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 seven-day average, as of 8 a.m., Monday, shall be maintained as a weekly record. To determine compliance with the maximum charging capacity, the steam flow meter shall be calibrated, maintained, and operated to measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor. The normal operating range of the of the MWCs shall be 80% to 100% of the design rated capacity. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, PSD-FL-129]

***2. Were the certifications tests completed with the installed equipment needed, as I understand it, to achieve the new downrating requested by the BOCC?***

In a letter dated August 3, 2000 from the Solid Waste Management Department of Bay County, we were provided the following status report:

- Physical modification of the forced draft fan wheel on MWC Unit No. 1 and MWC Unit No. 2 is scheduled to occur during the periods September 5, 2000 and September 6, 2000, respectively. Both units will be operating at the derated capacity by September 12, 2000.
- The demonstration test for each unit is scheduled to occur during the period November 6 – 12, 2000.
- Final compliance with all operating restrictions and monitoring requirements for the derated units shall be achieved by December 19, 2000.

***3. Are there any deadlines that have not been met? If so, what are they, and what is the last date for meeting such an unmet deadline.***

It is our understanding that all deadlines, to date, have been met. Please note that the FINAL permit contains the following compliance plan requirements:

**A.3.2.1. Compliance Plan.**

After the physical modifications are completed, the maximum charging rate of each municipal waste combustor shall be 245 tons of municipal solid waste per day (a total of 490 tons per day for the facility); 91.875 MMBtu heat input per hour, assuming a heating value of 4500 Btu per pound; and a steam production rate of 65,333 lbs/hr.

**A.3.2.2.** A demonstration test shall be performed to verify the hourly steam flow rate at full load and establish the maximum demonstrated MWC unit load. As approved, Bay County is required to submit a protocol for testing which includes: (1) testing occurring over a 72-hour period; (2) testing conducted in accordance with the applicable requirements of 40 CFR 60.8 (performance tests); and (3) an opportunity for a Department and/or an U.S. EPA observer to be present at the demonstration test. Bay County shall achieve final compliance with all operating restrictions and monitoring requirements for the derated units by December 19, 2000.

**A.3.2.3.** The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor.



**A.3.2.4.** Steam flow shall be calculated in 24-hour rolling averaging periods, calculated from six consecutive 4-hour block arithmetic averaging periods for each unit.

**A.3.2.5.** Steam flow shall not exceed an average of 65,333 lbs/hr over any 24-hour rolling average period for each unit (provided the demonstrated full load steam flow rate/maximum demonstrated MWC unit load is less than or equal to 65,333 lbs/hr; otherwise, the full load steam flow rate determined from the demonstration test will be used).

**A.3.2.6.** Steam flow shall not exceed an average of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit.

**A.3.2.7.** The monitoring data must be maintained for periodic inspections by the Department and U.S. EPA, Region 4

**A.3.2.8.** Any 24-hour average steam flow in excess of 65,333 lbs/hr for each unit (or the full load steam flow rate determined from the demonstration test) must be reported within seven calendar days to the Department and the U.S. EPA, Region 4.

**A.3.2.9.** Any 4-hour block arithmetic average steam flow rate in excess of 66,667 lbs/hr for each unit must be reported within seven calendar days to the Department and U.S. EPA, Region 4.

[Rules 62-4.070(3) and 62-213.440(1), F.A.C.]

***4. If there are unmet deadlines what are the consequences?***

If the facility exceeds the steam output level corresponding to 250 tons per day (equivalent to a steam flow of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit) after completing the modification to the forced draft fan wheel, the facility will be required to be in compliance with all applicable federal and state municipal waste combustor (MWC) requirements for large MWC units on schedule. The requirements for large MWC's are found in 40 CFR 60, Subpart Cb.

We trust that this letter answers your concerns. If you need further information, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.  
Adminstrator  
Title V Section

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 08-Aug-2000 07:24pm  
**From:** Alvaro Linero TAL  
LINERO\_A  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9523

**To:** Scott Sheplak TAL ( SHEPLAK\_S )  
**CC:** Tom Cascio TAL ( CASCIO\_T )  
**CC:** Bruce Mitchell TAL ( MITCHELL\_B )

**Subject:** Re: Bay County Incinerator Derating

Scott. This relates to my earlier E-Mail on this subject. Please handle Bobby Cooley's referral regarding the Derating of Bay County. Bobby copied someone named "Mantay" at Bay County on the referral to me as well as David Struhs and Alan Bense (at the legislature).

I recommend preparing a reply much like those that come to us on Pink Sheets and letting Clair see your response first.

Thank you. Al.

*Tom,  
Please draft response  
for my review & Clair.  
to the General's questions.  
Scott  
8/9*

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 08-Aug-2000 07:14pm  
**From:** Alvaro Linero TAL  
LINERO\_A  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9523

**To:** Bobby Cooley PEN 850/595-8300 ( COOLEY\_B@a1.deppns.dep.state.fl.us )  
**CC:** Andy Allen PEN ( ALLEN\_A @ A1 @ DEPPNS )  
**CC:** Scott Sheplak TAL ( SHEPLAK\_S )  
**CC:** Tom Cascio TAL ( CASCIO\_T )  
**CC:** Bruce Mitchell TAL ( MITCHELL\_B )

**Subject:** Re: Bay County Incinerator Derating

Mr. Cooley: I received your E-Mail Re: Bay County derating. I forwarded it to Scott Sheplak, Administrator of the Title V Section. They included the derating conditions developed by EPA Region IV as federally-enforceable requirements in the Title V permit and referenced the derating in the Public Notice for the Draft Title V Permit.

Scott and his engineer(s) on this matter will respond to the General's questions.

Thanks. Al Linero.

# INTEROFFICE MEMORANDUM

**Date:** 08-Aug-2000 05:51pm  
**From:** Bobby Cooley PEN 850/595-8300  
COOLEY\_B@a1.deppns.dep.state.fl.us  
**Dept:**  
**Tel No:**

**To:** Carl D Peterson ( vikingsword@juno.com )  
**CC:** Alvaro Linero TAL ( LINERO\_A@A1 )

**Subject:** Re: Bay County Incinerator Derating

General Peterson, I am forwarding your email to a Mr. Al Linero in the Division of Air Management in Tallahassee who has been handling this permit. He should be able to answer your questions. Let me know if you need anything else. Thanks for your concern. bc

Mr. Cooley: I'm not familiar with the individual in charge of the DEPs involvement with the derating of the Bay County incinerator, hence this message is directed to you.

Today it was announced by Commissioner Atkinson at the BOCC meeting that the county had finally received the derating certification for the county's incinerator after four years of negotiations. It was not made clear what DEP approved and I would appreciate a response to the following questions in order to clear the air on this issue. No pun intended.

1. What is the final permit rating and when was it issued?
2. Were the certifications tests completed with the installed equipment needed, As I understand it, to achieve the new downrating requested by the BOCC?
3. Are there any deadlines that have not been met? If so, what are they and what is the last date for meeting such an unmet deadline.
4. If there are unmet deadlines what are the consequences?

Carl D. Peterson  
Major General USAF Retd.  
(850) 871-1575

# INTEROFFICE MEMORANDUM

COPY ALL  
BAR STAFF  
1-19-00

Date: 11-Jan-2000 11:34am  
From: Shari Naftzinger TAL 850/487-2  
NAFTZINGER\_S@a1.epic5.dep.state.fl.us  
Dept:  
Tel No:

To: See Below  
Subject: Reminder re: contacts with legislators, committee and staff

It is very important for our legislative and governmental affairs team to be aware of contacts between DEP and legislative office, congressional offices, and committees.

So please heed this gentle reminder to make this office aware of any phone, mail, e-mail or personal contact you or your staff have with members of the Legislature, Congress, their personal staff, and committee staff.

We ask that by e-mail, you let us know in advance of scheduled appointments, the topic, attendees, time and location; and then an after-the-fact e-mail with what took place and if any follow up is necessary.

Also by e-mail, please alert us of any phone contacts.

Please "Cc:" this office on correspondence. (See distribution below.)

It is always appropriate to include Legislative & Governmental Affairs staff at a meeting with members (or their staff) of the legislature, Congress or committee staff. Please CALL to schedule. (See distribution below, or ask for the assigned lobbyist.)

This is the recommended distribution:

STATE: Mike Joyner & Stephanie Leeds, cc: Shari Naftzinger (487-2917, sc 277-2916)  
FEDERAL: Sally Mann & Leslie Palmer, cc: Mike Joyner (487-2231, sc 277-2231)

Thank you in advance for your cooperation and assistance.

## Distribution:

To: Paula Mueller TAL	( MUELLER_P@a1 )
To: Peggy Maloney TAL	( MALONEY_P@a1 )
To: Bobbie Rednour TAL	( REDNOUR_B@a1.epic5.dep.state.fl.us )
To: Jamie DeLoach TAL	( DELOACH_J@a1.epic6.dep.state.fl.us )
To: Donna D. Beebe TAL	( BEEBE_DD@a1 )
To: Bruce Deterding TAL	( DETERDING_B@a1.epic5.dep.state.fl.us )
To: Linda Frohock TAL	( FROHOCK_L@a1 )
To: Geoffrey Mansfield TAL	( MANSFIELD_G@a1 )
To: Alisha Simpson JAX	( SIMPSON_A@a1.depjax.dep.state.fl.us )
To: Cheryl Coker TAL	( COKER_C@a1.epic6.dep.state.fl.us )
To: Jim Stoutamire TAL	( STOUTAMIRE_J@a1 )
To: Tammy Levingston TAL	( LEVINGSTON_T@a1.epic5.dep.state.fl.us )
To: Patricia Boyett TAL	( BOYETT_P@a1.epic6.dep.state.fl.us )
To: Kathy A. Carter TAL_INSP_GEN	( CARTER_KA@a1 )



Solid Waste Management Department  
Mr. Wm. G. Hudson, Director  
3410 Transmitter Road  
Panama City, Florida 32404  
(850) 784-4028

August 3, 2000

Scott  
Bruce

Clair  
from: Howard  
8/8

RECEIVED

AUG 07 2000

DIVISION OF AIR  
RESOURCES MANAGEMENT

BOARD OF COUNTY  
COMMISSIONERS

Mr. Howard L. Rhodes, Director  
Department of Environmental Protection  
Division of Air Resources Management  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Subject: Bay County Resource Recovery Facility  
Demonstration Test Protocol**

POST OFFICE Box 1818  
PANAMA CITY, FLORIDA 32402

COMMISSIONERS:

CAROL ATKINSON  
DISTRICT I

RICHARD STEWART  
DISTRICT II

ROBERT WRIGHT  
DISTRICT III

DANNY SPARKS  
DISTRICT IV

MARC NOLEN  
DISTRICT V

Dear Mr. Rhodes:

Enclosed is a copy Bay County's test protocol for demonstrating the maximum steam load of each MWC unit at the Bay County Resource Recovery Facility (Facility). This demonstration test protocol is submitted in accordance with Item A.3.2.2 of the Facility's Title V Permit and the September 30, 1999 letter from USEPA Region IV approving the derating of the MWC units.

Physical modification of the forced draft (FD) fan wheel on MWC Unit No. 1 and MWC Unit No. 2 is scheduled to occur during the periods September 5, 2000 and September 6, 2000, respectively. Both units will be operating at the derated capacity by September 12, 2000 in accordance with the Increment 4 (completion of on-site construction or installation of emission control equipment or process change) milestone date for the Facility specified in the FLDEP State Plan.

The Demonstration Test for each unit is scheduled to occur during the period November 6 -12, 2000 following scheduled maintenance outages that will be conducted on each MWC unit in October. Final compliance with all operating restrictions and monitoring requirements for the derated units shall be achieved by December 19, 2000 in accordance with Item A.3.2.2 of the Facility's Title V Permit and the September 30, 1999 letter from USEPA Region IV approving the derating of the MWC units.

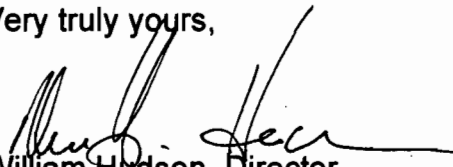
Representatives of the Department and/or USEPA Region IV are invited to observe the physical modification work to the FD fans and the Demonstration Test program. We will notify you of any changes to the schedule outlined above.

JONATHAN A. MANTAY, CGFM  
COUNTY MANAGER

Mr. Howard L. Rhodes  
Page 2  
August 3, 2000

Please contact me at (850) 784-4028 should you have any questions.

Very truly yours,



William Hudson, Director  
Bay County Solid Waste Management Department

WGH/wgh

cc: C. H. Fancy, FLDEP  
Jon Mantay, County Administrator  
Clifton "Travis" Windham, Director, Utility Services Department  
Nevin Zimmerman, Burke & Blue  
Jerry Gross, Plant Manager Montenay Bay  
Tony LoRe, Camp Dresser & McKee



# **BAY COUNTY RESOURCE RECOVERY FACILITY CAPACITY DEMONSTRATION TEST PROTOCOL**

## **1.0 Background**

Bay County owns the Bay County Resource Recovery Facility (BCRRF) located in Panama City, Florida. The BCRRF consists of two independent municipal waste combustor (MWC) units, each of which was originally designed to process to 255 tons-per-day (TPD) of municipal solid waste (MSW) with a higher heating value of 4500 Btu/lb. The BCRRF is operated by Montenay Bay LLC, under a service agreement with Bay County and provides solid waste disposal services to Bay County and to five surrounding counties in Florida.

In June 1999 Bay County requested formal approval from the United States Department of Environmental Protection (USEPA) Region IV and the Florida Department of Environmental Protection (FLDEP) to de-rate the processing capacity of each MWC to 245 tons per day of MSW having a higher heating value of 4500 Btu/lb. The USEPA approved Bay County's request in a letter to Mr. Howard Rhodes of the Florida DEP dated September 30, 1999.

The approval to de-rate required that a capacity demonstration test be performed after physical modification was completed to each unit. The approved physical modification involves altering the forced draft (FD) fan wheel on each MWC to reduce the available combustion air and thus the heat release capacity as measured by steam flow. The demonstration test is intended to show that the unit capacity of each MWC does not exceed 245tpd after the physical modification is made. The purpose of this document is to outline the procedures to be used to conduct the capacity Demonstration Test in accordance with the USEPA Region IV approval letter dated September 30, 1999.

## **2.0 Facility Description**

The BCRRF consists of two Westinghouse O'Connor water-walled rotary combustor and boiler trains, a turbine-generator, two truck scales, a scale house, an enclosed tipping floor, two conveyor systems to charge MSW into the combustors, two electrostatic precipitators for particulate control, an ash handling system, a stack, a control room, and associated ancillary equipment. The facility also has administration offices, change rooms, parking areas, roadways, and security fencing.

Municipal solid waste to be processed is delivered to the facility and unloaded on the tipping floor. Front-end loaders are used to move the waste onto conveyors that transport the waste to the combustor feed chutes. The waste is then combusted in the water-cooled rotary combustors.

Each combustor has a forced draft (FD) fan to supply combustion air to the combustor barrel. The heat released from the combustion process is recovered as the hot gases flow from the combustor barrel through the radiant , superheater, evaporator, economizer and air heater sections of the boiler. Superheated steam is produced from the recovered heat and is used to drive a turbine-generator that produces electricity for sale.

Each MWC unit has an electrostatic precipitator (ESP) following the boiler to remove particulate matter from the flue gas. Each ESP is followed by an induced draft (ID) fan used to discharge the flue gas to atmosphere through separate flues contained within the common stack. The BCRRF continuously monitors oxygen and carbon monoxide levels in order to control the combustion process. Opacity levels after the ESPs are also monitored on a continuous basis.

### **3.0 Demonstration Test Procedures**

#### **3.1 Test Objectives**

The objectives of the test program is to demonstrate that the maximum 24-hour average steam flow for each MWC unit does not exceed 65,333 lb./hr (245 tpd) and the maximum 4-hour average steam flow for each MWC unit does not exceed 66,667 lb./hr (250 tpd). The 24-hour average shall be calculated using six consecutive 4-hour block averages on a rolling basis throughout the test period. The 4-hour average shall be calculated using four consecutive 1-hour averages on a block basis throughout the test period.

#### **3.2 Test Duration**

The Demonstration Test shall be conducted over a continuous 168-hour period. This extended duration, while more stringent than the 72 hour test outlined in the USEPA Region IV approval letter dated September 30, 1999, it will allow the test to be more representative of normal operation. The test will be conducted with both combustion units operating at full load.

#### **3.3 Notification Requirements**

The BCRRF will provide written notification of the schedule dates for the Demonstration Test to the FLDEP representatives at least two weeks prior to commencing the Demonstration Test.

#### **3.4 Steam Flow Measurement**

Steam flow shall be continuously monitored and recorded in accordance with §60.58b(6)(i) and (ii) that specifies the requirements for steam flow monitors installed on MWCs.

### 3.5 Operating Conditions

The Demonstration Test shall be conducted with each of the MWC units operating under designed conditions at the de-rated design capacity. The BCRRF shall be operated in accordance with normal day-to-day procedures. For example, MSW that is on the tipping floor shall be loaded onto the conveyors by the front-end loaders and fed into the respective feed chutes. Non-combustible materials shall be removed from the MSW piles. However, no deviations from normal tipping floor operating procedures shall be made (such as segregating a particular type or load of waste for processing). Waste in the feed chute shall be fed into the combustor barrel using the hydraulic ram feeding system. The hydraulic ram speed rate and the combustion air control system (used to supply combustion air to the various windbox sections) shall be modulated to maintain designed parameters to ensure complete combustion of the MSW. The continuous emission monitoring (CEM) system shall be used to record and store the hourly steam flow rate for each unit. The recorded hourly steam flow rates will be used to calculate the highest 24-hour rolling average steam flow to demonstrate compliance with the de-rated load capacity of 65,333lb/hr.

### 3.6 Sample Calculations

4-hr block average steam flows shall be calculated as follows:

$$4\text{-hr average} = (1\text{HRSF}_{N-3} + 1\text{HRSF}_{N-2} + 1\text{HRSF}_{N-1} + 1\text{HRSF}_N)/4$$

Where:  $1\text{HRSF}_N$  = 1 Hr Average Steam Flow For Hour N

$1\text{HRSF}_{N-1}$  = 1 Hr Average Steam Flow For Hour N-1

$1\text{HRSF}_{N-2}$  = 1 Hr Average Steam Flow For Hour N-2

$1\text{HRSF}_{N-3}$  = 1 Hr Average Steam Flow For Hour N-3

24-hr rolling average steam flows shall be calculated as follows:

$$24\text{-hour average} = (4\text{HRSF}_{n-5} + 4\text{HRSF}_{n-4} + 4\text{HRSF}_{n-3} + 4\text{HRSF}_{n-2} + 4\text{HRSF}_{n-1} + 4\text{HRSF}_n)/6$$

Where:  $4\text{HRSF}_n$  = 4 Hr Average Steam Flow For 4 Hr Period N

$4\text{HRSF}_{n-1}$  = 4 Hr Average Steam Flow For 4 Hr Period N-1

$4\text{HRSF}_{n-2}$  = 4 Hr Average Steam Flow For 4 Hr Period N-2

$4\text{HRSF}_{n-3}$  = 4 Hr Average Steam Flow For 4 Hr Period N-3

$4\text{HRSF}_{n-4}$  = 4 Hr Average Steam Flow For 4 Hr Period N-4

$4\text{HRSF}_{n-5}$  = 4 Hr Average Steam Flow For 4 Hr Period N-5

### 3.7 Test Exclusions

If an equipment failure or upset condition occurs that prevents either or both of the MWC units from operating normally, the Demonstration Test shall be temporarily suspended for that unit(s) until normal operations can be re-established. If normal operations can not be re-established within a reasonable period of time, the Demonstration Test shall be stopped and repeated in its entirety once the problem can be corrected.

If insufficient waste is available to operated both units at full load, the test shall be re-scheduled to another date when sufficient MSW is available or alternatively, the BCRRF shall obtain FLDEP approval to demonstrate the capacity of each MWC unit at separate times.

#### 4.0 Test Report

Within 30 days following completion of the Demonstration Test, the BCRRF shall submit a summary report containing the 24-hour rolling average steam flows and the 4-hour block average steam flows calculated for each unit during the Demonstration Test period. The maximum 24-hour average steam flow achieved during the performance test will be the maximum demonstrated unit load level for each combustor. The test report shall certify that the maximum demonstrated steam flow for each MWC unit did not exceed 65,333 lb./hr on a 24-hour rolling average basis and 66,667 lb./hr on a 4-hour block basis. The test report shall be submitted to the FLDEP for review and approval that each MWC unit has been de-rated to a capacity 245 tpd or less.

#### SAMPLE STEAM FLOW SUMMARY SHEET

Unit	Date	Time	Average Steam Flow (lb/hr)		
			1-Hr Block	4-Hr Block	24-Hr Rolling
1	10/1/00	0000-0100	65,300		
		0100-0200	65,400		
		0200-0300	65,300		
		0300-0400	64,000	65,000	
		0400-0500	62,000		
		0500-0600	61,000		
		0600-0700	66,000		
		0700-0800	65,000	63,500	
		0800-0900	63,000		
		0900-1000	64,000		
		1000-1100	65,000		
		1100-1200	64,000	64,000	
		1200-1300	65,300		
		1300-1400	65,400		
		1400-1500	65,300		
		1500-1600	64,000	65,000	
		1600-1700	62,000		
		1700-1800	61,000		
		1800-1900	66,000		
		1900-2000	65,000	63,500	
		2000-2100	63,000		
		2100-2200	64,000		
		2200-2300	65,000		
		2300-2400	64,000	64,000	64,100

1	10/2/00	0000-0100	65,000		
		0100-0200	64,500		
		0200-0300	65,300		
		0300-0400	64,800	64,900	64,150
		0400-0500	64,500		
		0500-0600	64,000		
		0600-0700	66,000		
		0700-0800	65,500	65,000	64,400

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR RESOURCES MANAGEMENT  
BUREAU OF AIR REGULATION  
TITLE V SECTION  
MAIL STATION #5505  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

FILED VIA FACSIMILE 850-922-6979

BAY COUNTY, FLORIDA,

Petitioners,

v.

PROPOSED PERMIT NO.: 0050031-002-AV

STATE OF FLORIDA,  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Respondent.

PETITION FOR ADMINISTRATIVE PROCEEDING

COMES NOW, Petitioner, BAY COUNTY, FLORIDA, as owner and permit holder for the Bay County Resource Management Center and moves for an Administrative Proceeding pursuant to Section 120.57, Florida Statutes, and says:

1. The Petitioner's name is BAY COUNTY, FLORIDA and its address is 644 Mulberry Avenue, Panama City, Florida 32401 and its telephone number is (850) 784-4015. The Respondent's name is DEPARTMENT OF ENVIRONMENTAL PROTECTION, DIVISION OF AIR RESOURCES MANAGEMENT BUREAU OF AIR REGULATION TITLE V SECTION and its address is Mail Station #5505 2600 Blair Stone Road Tallahassee, Florida 32399-2400 and its telephone number is (850) 488-1344. The Proposed Permit Number is 0050031-002-AV. The project is proposed for Bay County, Florida.

2. The Petitioner, BAY COUNTY, FLORIDA, received notice by letter dated January 31, 2000, attached hereto as Exhibit A (without Enclosures).

3. The Petitioner's substantial interests are directly impacted by the Respondent's inclusion of the Permitting Note in A.3.2.9. In an e-mail sent to Nevin J. Zimmerman on November 2, 1999, attached hereto as Exhibit B, Tom Cascio indicated that the Draft Permit would reflect the deletion of Specific Condition A.3.2.3. The Specific Condition appears to have been deleted from the Proposed Permit; however, Specific Condition A.3.2.3 has been added as a Permitting Note in A.3.2.9. The Petitioner again requested the deletion of A.3.2.9, the Permitting Note and the reference to the EPA letter referred to in the Permitting Note in a letter dated February 10, 2000, a copy of which is attached hereto as Exhibit C. A third party may assert that the Permitting Note is effectively a "death sentence" in that it would require closing the Bay County Resource Management Center if the provisions of A.3.2.9. are violated. The Bay County Resource Management Center is Bay County's primary method of solid waste disposal. Closure of the Bay County Resource Management Center would severely impact the disposal of solid waste in Bay County until such time as the Bay County Resource Management Center could be retrofitted to meet the requirements for a large MWC unit.

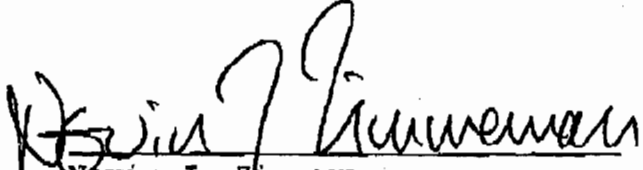
4. The facts presented in paragraph C. above are of such significance that the Respondent should remove A.3.2.9. and the

Permitting Note from the Proposed Permit No.: 0050031-002-AV.

5. The Petitioner requests that the Respondent remove A.3.2.9 and the Permitting Note from the Proposed Permit No.: 0050031-002-AV.

WHEREFORE, the Petitioner, BAY COUNTY, FLORIDA, requests an Administrative Hearing pursuant to Section 120.57, Florida Statutes.

Dated: February 14, 2000.

  
Nevin J. Zimmerman,  
Attorney for Petitioner





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

January 31, 2000

Mr. Jonathan A. Mantay  
Bay County Administrator  
310 West 6<sup>th</sup> Street  
Panama City, Florida 32401

Re: PROPOSED Title V Permit No.: 0050031-002-AV  
Bay Resource Management Center

Dear Mr. Mantay:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Bay Resource Management Center located at 6510 Bay Line Drive, Panama City, Bay County, Bay Industrial Park – approximately 2 miles North of the intersection of U.S. 231 and County Road 2301, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit. An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www2.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn. If you have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

  
C. H. Farley, P.E.  
Chief  
Bureau of Air Regulation

CHF/tbc

Enclosures

copy furnished to:

Mr. Nevin Zimmerman, Esq., Burke and Blue  
Mr. James M. Leddy, Plant Manager  
Mr. Gerald Joseph, P.E., DMG Environmental, Inc.  
Mr. Ed Middleswart, P.E., FDEP, NWD  
Mr. Gary Shaffer, FDEP, NWD Branch Office  
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)



"Protect, Conserve and Manage Florida's Environment and Natural Resources"

From: Tom Cascio TAL 850/488-1344 <Tom.Cascio@dep.state.fl.us>  
 To: Burke\_ & Blue\_GW\_Domain.B&B(NEVIN)  
 Date: Tue, Nov 2, 1999 8:47 AM  
 Subject: BAY COUNTY DRAFT PERMIT

Mr. Zimmerman:

As discussed with Scott Sheplak this morning, the PROPOSED Title V Permit for the Bay County Resource Recovery Facility will reflect the following changes to the DRAFT Permit:

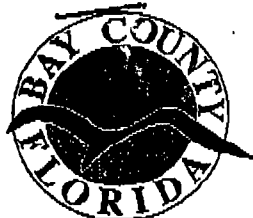
1. Specific Condition A.3.2.3. will be deleted.
2. Specific Condition A.5.1.6. will be deleted.
3. We will add distillate fuel oil as an allowable fuel in Specific Condition A.5.1.1.
4. We will replace the reference to "pit" with "tipping floor" in Specific Condition A.5.1.4.

Note: Unfortunately, we did not discuss Specific Condition A.70. We're checking with Michael Hewett for an assessment. So, as for now, plans are to include it in the PROPOSED Permit.

Tom Cascio

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*NJZ*

OFFICE COPY

OFFICE OF THE COUNTY ATTORNEYS

February 10, 2000  
VIA FACSIMILE (850) 922-6979

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Tom Cascio  
Department of Environmental Protection  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Proposed Title V Permit No.: 0050031-00-AV (Bay County Air Permit)

Dear Tom:

Attached are three pages from the proposed Bay County Air Permit that show our proposed changes.

1. Deletion of Note and reference to EPA letter on page 7 underneath A.3.2.9. We had an understanding we FDEP and EPA that the topic of "what happens if the Facility exceeds 250 tons per day" was not going to be in the permit as either a permit condition or a note. The EPA memorandum you sent to me from Scott Davis clearly states that this topic should *not* be discussed in the permit. We request that the note and reference to the EPA letter be deleted.
2. Change "90" on line two of A.39 (page 14) to "80" to be consistent with other provisions in the permit.
3. Add the words ""(steam flow)" in A.70 after the words "charging rates" to clearly define the term "charging rates."

Thank you for your immediate attention to this. We are hopeful that these issues (primarily issue number 1) can be resolved quickly.

Sincerely,

*Nevin J. Zimmerman*  
Nevin J. Zimmerman

NJZ/wgm

