

Mitchell, Bruce

To: Veazey, Sandra
Subject: RE: Monteray Power Corp.

11/5/02

Dear Sandra,

I have spoken with Mr. English, who asked me to speak with a Mr. Bennett (Montenay Power Corporation) out of Lake City. We are going to meet with Mr. Bennett on Thursday @ 2:00 p.m. to discuss Bay County's Title V permit and the permitted waste streams. I'll let you know of any significant outcomes from the meeting, if any. Take care.

Bruce

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

From: Veazey, Sandra
Sent: Friday, November 01, 2002 5:21 PM
To: Mitchell, Bruce
Cc: Sheplak, Scott; Vielhauer, Trina
Subject: RE: Monteray Power Corp.

Bruce,

Appreciate the update. Please let me know the outcome and if there's anything that I can do.

Thanks much,
Sandra

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

From: Mitchell, Bruce
Sent: Friday, November 01, 2002 4:17 PM
To: Veazey, Sandra
Cc: Sheplak, Scott; Vielhauer, Trina
Subject: RE: Monteray Power Corp.

11/1/02

Dear Sandra,

I tried to call Mr. English, but he was not available at the time. So, I left him a voice-mail-message to return the phone call to discuss. I have

MONTENAY POWER CORPORATION



Ernest Bennett
Vice President
Business Development

Rt. 8 Box 757 - Lake City, Florida 32055
Tel.: (386) 755-2264 - Fax (386) 754-5975
Email: ebenett@bellsouth.net

also briefed Trina on the denial of the proposed waste stream and the future potential processing of it as well. We will keep you in the loop of any discussions and correspondence. Take care.

Bruce
SC/293-9198

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

From: Veazey, Sandra
Sent: Friday, November 01, 2002 10:41 AM
To: Linero, Alvaro; Mitchell, Bruce
Subject: FW: Monteray Power Corp.

Please see below. Thanks a bunch guys.

Sandra

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

From: Brice, Susan
Sent: Friday, November 01, 2002 8:18 AM
To: Veazey, Sandra
Subject: Monteray Power Corp.

Dealing with Bob Williams of Smurft-Stone yesterday - he had a request. Wanted MJ to call Bill English (old Georgia Senator) to see if there was any assistance she could provide. Seems Monteray Power is having problems with Tallahassee being able to burn carpet in their incinerators in Bay County. MJ would appreciate you calling. Mr. English's cell phone number is (912) 536-1983 - regular number is (478) 237-7862. If this doesn't make sense call me. Sometimes I do better talking than writing.

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11-4-02
 @ 3:22 - left a v-m-m.
 @ 3:24 - hung up - call back request message.
 @ 3:26 -
 @ 3:40 Spoke w Mr. English w Ed Snee & Scott Skyles.

Ernie Bennett - 386/785-2264
 w Monterey Corp. - to call me back and possibly seek
 a meeting w us here. Ed Snee listened.

Mitchell, Bruce

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1
11-1-02

2419
left a v-m.
BR

11-1-02

25105

Briefed Trina on this issue.

BR

Mitchell, Bruce

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Sent: Friday, November 01, 2002 5:17 PM
To: Veazey, Sandra
Cc: Sheplak, Scott; Vielhauer, Trina
Subject: RE: Monterey Power Corp.

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11/1/2002



Department of Environmental Protection

Jeb Bush
Governor

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 6th Street
Panama City, Florida 32401

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

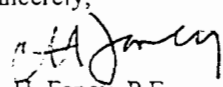
Dear Mr. Mantay:

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, Monteny Bay LLC
Scott Sheplak, BAR
Sandra Veazey, NWD
Martha Nebelsiek, Esq., DEP

5/8/01 cc: Reading Bill
Tom Cocco

"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

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

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

Yolanda Kelley 5-9-01
 Signature Agent

X *Yolanda Kelley* 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)

Article Sent To:

Mr. Jon Mantay

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

Postmark:
Here

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

MONTENAY BAY LLC



RECEIVED

MAY 04 2001

MBLLC/DEP-01-081

May 2, 2001

BUREAU OF AIR REGULATION

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

Dear Mr. Fancy:

Enclosed, please find a packet of material describing a waste stream for which we are seeking approval.

For tracking purposes, this approval request is for Chemical Conservation Corp/TSDf Consolidation. We feel that this material meets conditions under A.5.1.6 and A.5.1.8.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Chalmous Beechem', written over a horizontal line.

Chalmous Beechem
Operations Manager

5-4-01

Assigned to Bill to review and provide fact-findings
on 5/16/01. *ba* gave a Xerox copy.

NOV-27-2000 MON 04:25 PM CHEMICAL CONSERVATION

FAX NO. 4078586520

P. 02

Montenay / Onyx Specialty Waste Services, Inc. (OSWS), Material Profile Form (MPF).
Material Profile Form # (Shaded areas are for MSWS use only.) Initiation Date: / / Page 1 of 3.

Customer Code: _____ Generator Code: _____ Billing Code: _____ Approval Code(s): _____
Montenay Initiator: _____ Montenay Location(s): _____ Waste Processing Code(s): _____

1.0 GENERATOR INFORMATION:

1. Generator Company Name: Chemical Conservation Corporation / Permalix
2. Address: 10100 Rocket Blvd 3. City: Orlando 4. State: FL 5. Zip: 32824
6. Contact Name: Joe Drueke / Michelle Suope
7. Tel #: 407-959-4441 8. Fax #: 407-955-2812 9. E-Mail ID #: pmalloj @permalixorlando.com
10. Generator EPA ID #: FLD980539728 (If multiple locations exist please attach relevant information)

2.0 CUSTOMER BILLING INFORMATION: 3.0 PICK UP LOCATIONS:

1. Company Name: Chemical Conservation Corp
2. Address: 10100 Rocket Blvd
City: Orlando
3. State: FL 4. Zip: 32824
5. Billing Contact Name: Patricia Malloy
6. Billing Contact Title: Customer Service Manager
7. Tel # (s): (407) 859-4441
8. Fax # (s): (407) 855-2812
9. E-Mail ID #: pmalloj @permalixorlando.com
10. Federal Tax ID # for Billing Purposes: 31-1017466
1. Company Name: _____
 If same as in Section 1.0 please check here
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 Montenay 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. Yes No JD MYS Initials

6.0 REGULATORY WASTE INFORMATION:

A. Yes No This waste is R.C.R.A. Non Hazardous
B. Yes No Regulated or Licensed Radioactive Waste
C. Yes No Medical / Infectious or Chemotherapeutic Waste
D. Yes No OSHA Carcinogens (outline in waste constituents)
E. Yes No Regulated Benzene NESHAP Waste
F. Yes No Asbestos Containing Waste
G. Yes No Dioxin or Furan bearing Waste
H. Yes No Any type of PCB Waste
I. Yes No Explosives / Shock Sensitive
J. Yes No Polymerizable Material
K. Yes No Air / Water Resitive
L. Yes No Oxidizer / Reducer
M. Yes No Total Cyanide _____ ppm
N. Yes 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: NON REGULATED MATERIAL
- 2. Process of Material or Waste generation: TSDf CONSOLIDATION
- 3. Total Quantity of Material / Waste: 14 (Circle) 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. <u>oily absorbants</u>	_____	<u>0 - 50</u>
2. <u>PPE, rags</u>	_____	<u>0 - 50</u>
3. <u>plastic</u>	_____	<u>0 - 50</u>
4. <u>wood</u>	_____	<u>0 - 50</u>
5. <u>dirt</u>	_____	<u>0 - 20</u>
6. <u>paint fillers, air filters</u> ^{Paper/foil}	_____	<u>0 - 50</u>
7. <u>soaps/surfactants</u>	_____	<u>0 - 50</u>
8. <u>oil, grease</u>	_____	<u>0 - 50</u>
9. <u>metal cont. < 5 gal</u>	_____	<u>0 - 5</u>
10. <u>resin</u>	_____	<u>0 - 50</u>
<input type="checkbox"/> <u>aerosol cans (punctured)</u>	_____	<u>0 - 5</u>

(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 VARIABLES (Describe) 3. Color VARIABLES (Describe) 4. No. of Phases: _____ Viscosity High Med Low
- 6. Flash Point (Liquid & Non-Liquids) < 100°F 100° - 139°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 ≤ 8.0 > 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) _____ Estimated Exact 19. Ash: _____ %
- 20. SULFUR _____ % 21. NITROGEN _____ % 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

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 checked="" type="checkbox"/> Roll-offs.
<input type="checkbox"/> Consumer packaged > 500 lbs	<input type="checkbox"/> Intermediate 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		

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 checked="" 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 _____, Phenol _____

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 checked="" type="checkbox"/>	Oil Contamination <input checked="" type="checkbox"/>	Teflon / PTFE <input type="checkbox"/>	FIFRA Regulated Pesticides <input type="checkbox"/>	Isocyanates <input checked="" type="checkbox"/>	Sharps <input checked="" type="checkbox"/>
Organic Solvent Contamination <input type="checkbox"/>	DEA Materials <input type="checkbox"/>	DOT Regulated Material <input type="checkbox"/>	Acrylates <input checked="" 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 checked="" type="checkbox"/>		
if none are present please check here. <input type="checkbox"/> None					

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: Joe Drucke

Name & Title (Printed or Typed): JOE DRUCKE PLANT MANAGER

FROM : ENCO LABS

FAX NO. : 4078889467

Apr. 09 2001 11:08AM P1

Environmental Conservation Laboratories, Inc.
10207 General Drive
Orlando, Florida 32824-8529
407 / 826-5314
Fax 407 / 850-6945
www.encolabs.com



DHRS Certification No. E83182

CLIENT : Chemical Conservation Corp.
ADDRESS: 10100 Rocket Blvd.
Orlando, FL 32824

REPORT # : ORL15290
DATE SUBMITTED: March 23, 2001
DATE REPORTED : April 9, 2001

PAGE 1 OF 6

ATTENTION: Beth Myers

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

PROJECT #: 03-23-01

Chemical Conservation

03/23/01

#1 - Debris-Rags, Plastic

PROJECT MANAGER

A handwritten signature in black ink, appearing to read "Marcia C. Terlep".

Marcia C. Terlep

FROM : ENCO LABS

FAX NO. : 4078889467

Apr. 09 2001 11:09AM P2

ENCO LABORATORIES

REPORT # : ORL15290

DATE REPORTED: April 9, 2001

REFERENCE : 03-23-01

PROJECT NAME : Chemical Conservation

PAGE 2 OF 6

RESULTS OF ANALYSIS

EPA METHOD 1311/8260 -
TCLP VOAS BY GC/MS

	<u>Debris-Rags, Plastic</u>	<u>LAB BLANK</u>	<u>Units</u>
Benzene	200 U D1	2.0 U	µg/L
Carbon tetrachloride	200 U D1	2.0 U	µg/L
Chlorobenzene	200 U D1	2.0 U	µg/L
Chloroform	200 U D1	2.0 U	µg/L
1,2-Dichloroethane	200 U D1	2.0 U	µg/L
1,1-Dichloroethene	200 U D1	2.0 U	µg/L
2-Butanone	1000 U D1	10 U	µg/L
Tetrachloroethene	200 U D1	2.0 U	µg/L
Trichloroethene	200 U D1	2.0 U	µg/L
Vinyl Chloride	200 U D1	2.0 U	µg/L
<u>Surrogate:</u>	<u>% RECOV</u>	<u>% RECOV</u>	<u>LIMITS</u>
Dibromofluoromethane	97	101	52-149
D8-Toluene	96	102	70-132
Bromofluorobenzene	94	95	60-135
Date Analyzed	04/02/01	04/02/01	

U = Compound was analyzed for but not detected to the level shown.

D1 = Analyte value determined from a 1:100 dilution.

FROM : ENCO LABS

FAX NO. : 4078889467

Apr. 09 2001 11:09AM P3

ENCO LABORATORIES

REPORT # : ORL15290

DATE REPORTED: April 9, 2001

REFERENCE : 03-23-01

PROJECT NAME : Chemical Conservation

PAGE 3 OF 6

RESULTS OF ANALYSIS

EPA METHOD 1311/8270 -
TCLP SVOAS BY GC/MS

	<u>Debris-Rags, Plastic</u>	<u>LAB BLANK</u>	<u>Units</u>
Total Cresol	150 U	30 U	µg/L
1,4-Dichlorobenzene	100 U	10 U	µg/L
2,4-Dinitrotoluene	100 U	10 U	µg/L
Hexachlorobenzene	100 U	10 U	µg/L
Hexachlorobutadiene	100 U	10 U	µg/L
Hexachloroethane	100 U	10 U	µg/L
Nitrobenzene	100 U	10 U	µg/L
Pentachlorophenol	100 U	10 U	µg/L
Pyridine	100 U	10 U	µg/L
2,4,5-Trichlorophenol	100 U	10 U	µg/L
2,4,6-Trichlorophenol	100 U	10 U	µg/L
<u>Surrogate:</u>	<u>% RECOV</u>	<u>% RECOV</u>	<u>LIMITS</u>
Nitrobenzene -D5	53	71	39-131
2-Fluorobiphenyl	58	74	44-131
Terphenyl -D14	71	90	47-160
Phenol -D5	54	72	12-122
2-Fluorophenol	46	71	30-114
2,4,6-Tribromophenol	75	78	55-159
Date Prepared	03/30/01	03/30/01	
Date Analyzed	04/06/01	04/06/01	

U = Compound was analyzed for but not detected to the level shown.

FROM : ENCO LABS

FAX NO. : 4078889467

Apr. 09 2001 11:09AM P4

ENCO LABORATORIES

REPORT # : ORL15290

DATE REPORTED: April 9, 2001

REFERENCE : 03-23-01

PROJECT NAME : Chemical Conservation

PAGE 4 OF 6

RESULTS OF ANALYSIS

<u>TCLP METALS</u>	<u>METHOD</u>	<u>Debris-Rags,Plastic</u>	<u>LAB BLANK</u>	<u>Units</u>
TCLP Arsenic Date Analyzed	1311/7060	0.050 U 03/30/01	0.010 U 03/30/01	mg/L
TCLP Barium Date Analyzed	1311/7080	2.0 U 04/03/01	0.50 U 04/03/01	mg/L
TCLP Cadmium Date Analyzed	1311/7130	0.10 U 04/02/01	0.020 U 04/02/01	mg/L
TCLP Chromium Date Analyzed	1311/7190	0.50 U 04/04/01	0.10 U 04/04/01	mg/L
TCLP Lead Date Analyzed	1311/7420	0.50 U 04/02/01	0.10 U 04/02/01	mg/L
TCLP Mercury Date Analyzed	1311/7470	0.025 U 04/03/01	0.00050 U 04/03/01	mg/L
TCLP Selenium Date Analyzed	1311/7740	0.050 U 04/03/01	0.010 U 04/03/01	mg/L
TCLP Silver Date Analyzed	1311/7760	0.20 U 04/02/01	0.040 U 04/02/01	mg/L

<u>MISCELLANEOUS</u>	<u>METHOD</u>	<u>Debris-Rags,Plastic</u>	<u>LAB BLANK</u>	<u>Units</u>
BTU Date Analyzed	ASTM/D240-85	6500 03/28/01	100 U 03/28/01	BTU/Lb
Percent Solids Date Analyzed	SM2540G	80 03/26/01	NA	%

NA = Not applicable

U = Compound was analyzed for but not detected to the level shown.

FROM : ENCO LABS

FAX NO. : 4078889467

Apr. 09 2001 11:10AM P5

ENCO LABORATORIES

REPORT # : ORL15290

DATE REPORTED: April 9, 2001

REFERENCE : 03-23-01

PROJECT NAME : Chemical Conservation

PAGE 5 OF 6

QUALITY CONTROL DATA

<u>Parameter</u>	<u>% RECOVERY MS/MSD/LCS</u>	<u>ACCEPT LIMITS</u>	<u>% RPD MS/MSD</u>	<u>ACCEPT LIMITS</u>
<u>EPA Method 1311/8260</u>				
1,1-Dichloroethene	95/105/ 98	36-185	10	34
Benzene	97/104/ 98	65-143	7	25
Trichloroethene	98/100/ 96	51-152	2	28
Toluene	99/103/ 94	62-144	4	24
Chlorobenzene	103/112/104	64-140	8	23
<u>EPA Method 1311/8270</u>				
Phenol	60/ 59/ 65	23-102	2	44
2-Chlorophenol	64/ 63/ 72	42-124	2	41
1,4-Dichlorobenzene	64/ 62/ 69	23-127	3	43
N-Nitrosodi-N-Propylamine	60/ 60/ 68	35-122	<1	43
1,2,4-Trichlorobenzene	65/ 67/ 72	47-129	3	43
4-Chloro-3-methylphenol	68/ 68/ 74	40-139	<1	25
Acenaphthene	71/ 67/ 77	49-122	6	28
4-Nitrophenol	75/ 73/ 79	10-159	3	52
2,4-Dinitrotoluene	79/ 75/ 80	48-139	5	21
Pentachlorophenol	74/ 71/ 77	25-149	4	42
Pyrene	80/ 79/ 82	50-146	1	32

Environmental Conservation Laboratories Comprehensive QA Plan #960038

< = Less Than

MS = Matrix Spike

MSD = Matrix Spike Duplicate

LCS = Laboratory Control Standard

RPD = Relative Percent Difference

This report shall not be reproduced except in full, without the written approval of the laboratory. Results for these procedures apply only to the samples as submitted.

FROM : ENCO LABS

FAX NO. : 4078889467

Apr. 09 2001 11:10AM P6

ENCO LABORATORIES

REPORT # : ORL15290

DATE REPORTED: April 9, 2001

REFERENCE : 03-23-01

PROJECT NAME : Chemical Conservation

PAGE 6 OF 6

QUALITY CONTROL DATA

<u>Parameter</u>	<u>% RECOVERY MS/MSD/LCS</u>	<u>ACCEPT LIMITS</u>	<u>% RPD MS/MSD</u>	<u>ACCEPT LIMITS</u>
<u>TCLP METALS</u>				
Arsenic, 1311/7060	107/107/ 97	56-125	<1	15
Barium, 1311/7080	115/113/116	68-120	2	12
Cadmium, 1311/7130	101/105/106	80-110	4	10
Chromium, 1311/7190	115/115/111	80-115	<1	10
Lead, 1311/7420	97/ 95/ 95	80-110	2	10
Mercury, 1311/7470	102/103/102	75-125	<1	12
Selenium, 1311/7740	95/ 98/103	50-135	3	15
Silver, 1311/7760	100/ 98/ 96	80-115	2	10

Environmental Conservation Laboratories Comprehensive QA Plan #960038

< = Less Than

MS = Matrix Spike

MSD = Matrix Spike Duplicate

LCS = Laboratory Control Standard

RPD = Relative Percent Difference

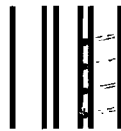
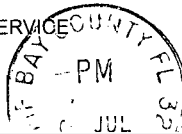
This report shall not be reproduced except in full, without the written approval of the laboratory. Results for these procedures apply only to the samples as submitted.

7099 3400 0000 1453 1668

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)	
Total Postage & Fees \$	
Name (Please Print Clearly) (to be completed by mailer) Mr. Jon Mantay, County Admin, Bay County Bldg. Sec Street, Apt. No., or PO Box No. 310 West 6th St. (Bay County, B.C.F.) City, State, ZIP+4 Panama City, Fla 32401	
PS Form 3800, July 1999 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) Yalonda Kelley B. Date of Delivery 7-9-01</p> <p>C. Signature <input checked="" type="checkbox"/> Yalonda Kelley <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>Mr. Jon Mantay County Administrator Bay County Bld. of County Comm. 310 West 6th Street Panama City, Florida 32401</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Copy from service label) 7099 3400 0000 1453 1668</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

UNITED STATES POSTAL SERVICE



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JUL 09 2001

BUREAU OF AIR REGULATION

• Send in this box • Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

Attn: Bruce Mitchell

File copy



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

July 3, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Jon Mantay
County Administrator
Bay County Board of County Commissioners
310 West 6th 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 15th, ^{17th & June 5th} which requested approval of a consolidated bulk waste material (labeled as Eastman Filter Paper) 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

"More Protection, Less Process"

Printed on recycled paper.

Memorandum

State of Florida
Department of Environmental Protection

TO: Clair Fancy

THRU: Bruce Mitchell 

FROM: William Leffler, PE

DATE: June 20, 2001

SUBJECT **Montenay Bay LLC Request for authorization to burn special waste.**

Montenay Bay has requested authority to burn the following special wastes:

May 15, 2001: MBLLC/DEP 01-87 Eastman Filter Paper

Additional information provided **June 1, 2001: MBLLC/DEP-01-95**

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The material is identified as Lot 2BZ-J007 and produced by Carolina Eastman, located in Columbia, South Carolina.

Corrugated paper filters are used to clean wash water in the production of plastic resin. The paper is wet with water, but clogged with plastic resin dust which has excellent fuel value. It will be delivered in large paper boxes or poly super sacks, which will require breaking to be mixed and fed with MSW.

The Material Profile Form provided dated May 31, 2001, and provided with the June 1 supplement, describes the material as polyester dust and pellets. The precise speciation of the polyester is not disclosed nor is an anticipated quantity specified. The profile checks "no" for halogens, but provides no analysis. The presence of halogenated esters is not eliminated by the profile sheet.

The polyester resin has excellent fuel value, but it also has the potential to melt through the grates, if not adequately mixed with MSW.

The Carolina Eastman mill was the source of polyester resins previously rejected because of fire retardants, heavy metals and fiberglass.

Recommendation: Disallow pending analysis or additional information or analysis identifying the composition of the "polyester resin" and quantification of potential waste stream.

May 24, 2001: MBLLC/DEP-01-090 Bailed Carpet Trimmings

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The producer is Inter Face, located in Lagrange, GA. No lot number or other identifier is given.

It consists of Nylon and PVC up to 50% each. (Profile says 0.50% each; and, totals do not add up to 100%). It also contains some fiberglass. It is not

hazardous as a waste material, but incineration may result in very significant emissions of HCl. The chlorine block on the profile sheet is blank, whereas the Bromine, Iodine and Fluorine boxes are checked "no." Total organic content is checked <1%, which is clearly inconsistent with synthetic textiles.

Carpet scraps are a difficult fuel because of tangling or wadding, which interrupts uniform mixing and feeding. Synthetic textiles also tend to melt and drip through the grate, if not adequately mixed with MSW.

The quantity of this waste stream or lot is not specified.

Recommendation: Disallow because of high HCL potential and inconsistencies on face of profile.

June 1, 2000; MMBLLC/DEP-01-092 Canteen MSW and Carpet Trimmings

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The producer is Inter Face, located in Lagrange GA. No lot number or other identifier is given.

A mixed batch of Carpet Trimmings and MSW like material from the mill canteen. The lot or waste stream quantity are not specified. While the ultimate source is a different mill than the carpet trimmings, above, there is no assurance that a considerable portion of the waste stream is not Poly Vinyl Chloride. Profile sheet indicates 0% for Bromine, Iodine and Fluorine, but is unmarked for Chlorine. The waste profile sheet indicated <1% total organic carbon, which is clearly inconsistent with any textile except spun glass. The waste profile says no analytical data is attached.

Recommendation: Disallow because of insufficient information and inconsistencies on the face of the material profile sheet. Allow reconsideration with analysis and revised profile indicating absence of PVC or similar materials, and quantification of the waste stream.

Note Regarding PVC Incineration: Hydrogen chloride or hydrochloric acid (HCl) is formed from the combustion of waste material containing poly vinyl chloride plastics, While some poly vinyl chloride is found in ordinary MSW the chlorine content of ordinary MSW ranges from 0.13% to 0.20%. Poly vinyl chloride plastics typically have 35% chlorine liberated upon combustion. The specific emissions of hydrogen chloride from PVC would be 200 times the specific emission from ordinary MSW. Even if PVC waste was limited to 3% of the MSW fuel, and the special waste consisted of 50 % PVC, the emissions of HCl will increase by a factor of three, or more. Neither incinerator design, nor any operational practice will affect the amount of HCl generated from waste combustion. Alkali scrubbing (lime or caustic soda) will partially control emissions, but such control equipment is not present at the Panama City facility. The electrostatic scrubber is not only ineffective, but the high acid levels will cause accelerated deterioration of the ESP reducing both its efficiency and useful life. PVC incineration has been linked with dioxin and furan emissions. The emission factors appear to be linked to combustion temperature, stoichimetric conditions, and residence time. No reliable emission factors have been established for PVC combustion in the

Westinghouse rotary tube incinerators, but emission levels can be presumed to increase linearly with chlorine concentration.

For this reason wastes containing a high chlorine level such as poly vinyl chloride plastics are not "typical of municipal solid waste" as contemplated by condition A.5.1.8/(h) of the Title V Permit 050031-002-AV.

Additional Issues: This office has considered more than a dozen sources of "special waste" in the past four months.

- What controls might we consider to prevent the simultaneous combustion or several special waste streams, each less than the three percent limit allowed by the permit, with a corresponding decrease in local MSW?
- What controls would be appropriate to assure that the waste being burned is the same as that represented by the waste profiles?

Ron Brookings in the Department's Panama City Branch Office was formerly the operations manager for this facility under Westinghouse. He is familiar with past determinations made on special wastes and says that there is a log book of analytical data on previously approved materials. I have agreed to copy him on all new requests for permission to burn "special waste". Ron and I agree that all special waste streams must be re-approved under a new title V permit and that old determinations do not "carry over." Nevertheless, the old authorizations could give us a basis for expedited review of some materials. Our "new look" position gives us an opportunity to review some hasty determinations that were made from insufficient waste profiles in the past, as well as an opportunity to set some standards requiring analysis and verification of the waste profile information.

Montenay Bay is under enforcement by the Northwest District for improper combustion methods. It arose from the practice of filling the combustor with flammable waste and tossing a railroad flare through the feeder ram. There was no preheating of the incinerator. The old oil ignition was not used, ostensibly because of costs; and, the supplemental gas fuel and ignition system are still in a permitting activity.

Bruce

MONTENAY BAY LLC



RECEIVED

JUN 05 2001

BUREAU OF AIR REGULATION

MBLLC/DEP-01-095

June 1, 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

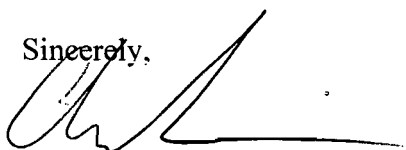
SUBJECT: Waste Approval Consideration
Title V FINAL Permit No.: 0050031-002-AV
Eastman Filter Paper

Dear Mr. Fancy:

Per a telephone conversation with William Leffler last week, I am submitting some additional material concerning the Eastman Filter Paper. Enclosed, please find a material profile of three pages.

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', written over a horizontal line.

Chalmous Beechem
Operations Manager

2BZJ-007

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: Carolina Eastman
 2. Address: 1402 South 9th St 3. City: Columbia 4. State: SC 5. Zip: 29109
 6. Contact Name: Phil Under
 7. Tel #: 803-924-9231 8. Fax #: 803-791-3643 9. E-Mail ID #: _____
 10. Generator EPA ID #: SCD041287762 (If multiple locations exist please attach relevant information)

2.0 CUSTOMER BILLING INFORMATION:
 1. Company Name: Enviro, Inc.
 2. Address: 2750 Patterson St.
 City: Greensboro
 3. State: NC 4. Zip: 27407
 5. Billing Contact Name: Lora Williams
 6. Billing Contact Title: Accounting
 7. Tel #(s) (336) 855-7925
 8. Fax #(s) (336) 855-4137
 9. E-Mail ID #: _____
 10. Federal Tax ID # for Billing Purposes: _____

3.0 PICK UP LOCATIONS:
 If same as in Section 1.0 please check here
 1. Company Name: customer level deliver
 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. Yes No PLC 5-31-01 Initials PL

6.0 REGULATORY WASTE INFORMATION:

A. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This waste is R.C.R.A. Non Hazardous	I. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Explosives / Shock Sensitive
B. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated or Licensed Radioactive Waste	J. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Polymerizable Material
C. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Medical / Infectious or Chemotherapeutic Waste	K. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Air / Water Reactive
D. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No OSHA Carcinogens (outline in waste constituents)	L. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Oxidizer / Reducer
E. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated Benzene NESHAP Waste	M. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Cyanide _____ ppm
F. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Asbestos Containing Waste	N. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Sulfide _____ ppm
G. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Dioxin or Furan bearing Waste	O. Other applicable _____
H. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Any type of PCB Waste	

Best Available Copy

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: Filter Paper from entry 1 & 2
2. Process of Material or Waste generation: water bath cleans the equipment that makes the thermoplastic
3. Total Quantity of Material / Waste: 20 (Circle) Tons / pallets / drums / other: once the the water is filtered
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. <u>filter paper with thermoplastic</u>	<u>100%</u>	
2. <u>powder dust / pellets</u>		
3.		
4. <u>actual filter paper is montan paper bed filter MDA#PF-90S</u>		
5. <u>actual filter stock is polyester blend paper media that is dry layered</u>		
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 formulas.

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 nil (Describe) 3. Color varies (Describe) 4. No. of Phases: 1 Viscosity High Med Low
6. Flash Point (Liquid & Non-Liquids) < 100°F 100° - 139°F 140° - 199°F ≥ 200°F. Check if material is solid
7. pH (Aqueous Liquids) or pH (Non aqueous) ≤ 2.0 > 2.0 ≤ 6.0 > 6.0 ≤ 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) NA % 18. Higher Heating Value (BTU/LB) > 10,000 Estimated Exact 19. Ash: _____ %
20. SULFUR 0 % 21. NITROGEN 0 % 22. Specific Gravity 8.1 or Bulk Density _____ Lb./Gal.
23. Free liquids present Yes No. 24. Free liquids are fully absorbed Yes No. Absorbant 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"/> Intermediate 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 checked="" type="checkbox"/> Gaylords | <input type="checkbox"/> Walking trailer |
| <input type="checkbox"/> Plant Trash | <input type="checkbox"/> Paper waste | <i>Cubic yard boxes or poly super sacks</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 <u>NA</u> mg/kg	Chromium <u>45</u> mg/kg	Nickel <u>NA</u> mg/kg
Antimony <u>NA</u> mg/kg	Chromium VI <u>45</u> mg/kg	Selenium <u>4</u> mg/kg
Arsenic <u>45</u> mg/kg	Copper <u>NA</u> mg/kg	Silver <u>45</u> mg/kg
Barium <u>400</u> mg/kg	Lead <u>45</u> mg/kg	Zinc <u>NA</u> mg/kg
Beryllium <u>NA</u> mg/kg	Mercury <u>2.2</u> mg/kg	Cadmium <u>4</u> mg/kg
Molybdenum <u>NA</u> mg/kg	If none are present please check here. <input checked="" type="checkbox"/> None	

11.2 Additional Materials of concern to MSWB: 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 _____ Phenol _____
 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 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 type="checkbox"/> | Acrylates <input type="checkbox"/> | | |
| Nicotine or salts <input type="checkbox"/> | Contaminated Empty Containers <input type="checkbox"/> | Fiberglass Waste <input 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. | | | | <input checked="" type="checkbox"/> None | |

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: *Phil L. Crider*

Name & Title (Printed or Typed): PHIL L. CRIDER Solid Hazardous Waste Specialist

Date: 5-31-01

MONTENAY BAY LLC



RECEIVED

MAY 17 2001

BUREAU OF AIR REGULATION

MBLLC/DEP-01-087

May 15, 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 Approval Consideration
Title V FINAL Permit No.: 0050031-002-AV

Dear Mr. Fancy:

Enclosed, please find a one page profile sheet describing a waste stream for which we are seeking Approval.

For tracking purposes, this approval request is for Eastman Filter Paper. We feel that this material meets condition A.5.1.8.(h).

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Chalmous Beechem', with a horizontal line extending to the right.

Chalmous Beechem
Operations Manager

NON-HAZARDOUS MATERIAL PROFILE SHEET

I. Customer Information

Profile No. _____

Generator: Columbia-Eastman
Address: Enter 26
Columbia, SC 29202
Phone #: 914/555-7925 EPA ID#: SLB043277
Contact: David Ormond

Broker: FICFLO, INC.
Address: 2750 Patterson Street
Greensboro, NC 27407
Phone #: 914/555-7925
Contact: David Ormond

II. Material Description/Origin

~~Material Name~~ Filter Paper w/ Thermoplastic

Waste is hazardous Yes No
Waste is toxic Yes No

~~Reason for Disposal~~ Expired
 Out of Spec Low Value Waste
 Contaminated, Other
Contaminant thermoplastic

~~Origin~~
 Raw Material Intermediate Product
 Production Waste Finished Product
Description of Process Generating Waste
Water Bath

~~Physical Description~~
 Solid Powder Liquid Semi-solid
Minimum % Solids 100 Particle size _____
Stratified Yes No
Homogenous Yes No
Free Standing Liquids Yes No
Sample Yes No if needed

III. Packaging/Shipping

~~Material Composition~~
 Plastic, Polymer Composition _____
 Foli Paper
 Other (specify) Fiber Boxes
~~Volume per Package~~ 1 cubic yard

~~Shipping Container~~
 Box Drum Bulk Solid
 Other (specify) _____
Volume/weight per Container 1 cubic yard
Unfilled Package Weight ~100 lbs

~~Frequency of Shipments~~
 One time Periodic (specify) 5-10 boxes/yr
Amount per Shipment _____

~~Proper DOT Shipping Name~~ Filter paper with thermoplastic substrate
~~DOT Hazard Class~~ None

IV. Chemical Characteristics

Analytical Composition	(w%)	TCMP Metals (ppm)	(Include all TCLP Metals)
<u>Filter paper with</u>	%	<u>N/A</u>	
<u>thermoplastic polyester</u>	%		
<u>dust and pellets</u>	<u>100</u> %		
_____	%		
_____	%		
_____	%		
_____	%		
Total (100%)	<u>100</u> %		

~~Physical Characteristics~~
N/A pH High Viscosity (cp)
N/A Boiling Point (°F)
N/A Melting Point (°F)
421 Ignition Point (°F)
0.8-1.2 Density (lb/ft³)
N/A Flash Point (°F)
None % Free Liquid
>10k Heating Value (Btu/lb)

~~Chlorine~~ 0 ~~Bromine~~ 0 ~~Iodine~~ 0
~~Fluoride~~ 0 ~~Sulfur~~ 0 ~~Cyanide~~ 0 ~~Nitrogen~~ 0

~~Attached to Containers~~
 Yes No

V. Safety Issues

~~Special Handling or Storage Requirements~~
None

VI. Current Disposal Method

Municipal Landfill Non-Hazardous Incinerator
 Hazardous Waste Landfill Hazardous Incinerator

VII. Certification

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I further certify that the material is nonhazardous and poses no serious public safety nor health threat.

David R. Ormond Signature David R. Ormond Name (print) Reg. Super Title 9-28-83 Date

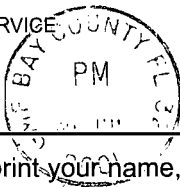
U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

1637 1453 0000 004E 6902

Article Sent To:		Postmark Here
Mr. Jon Mantay		
Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
Name (Please Print Clearly) (to be completed by mailer)		
Mr. Jon Mantay, County Admin., Bay County, Bd. of CC		
Street, Apt. No., or PO Box No.		
310 West 6 th Street		
City, State, ZIP+4		
Panama City, Fla 32401		
PS Form 3800, July 1999		See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) <i>Yalonda Kelley</i> B. Date of Delivery <i>7-2-01</i></p> <p>C. Signature <i>Yalonda Kelley</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. Jon Mantay County Administrator Bay County Bd. of County Comm. 310 West 6th Street Panama City, Florida 32401</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Copy from service label) 7099 3400 0000 1453 1637</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

UNITED STATES POSTAL SERVICE



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Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

JUL 10 2001

RECEIVED

attn: Bruce Mitchell

32399-2400



File Copy



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

July 3, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Jon Mantay
County Administrator
Bay County Board of County Commissioners
310 West 6th 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 ^{24th}, which requested approval of a consolidated bulk waste material (labeled as Bailed Carpet Trimmings) 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 850/413-9198 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
- Martha Nebelsiek, Esq., DEP

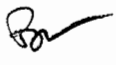
"More Protection. Less Process"

Printed on recycled paper.

Memorandum

State of Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Bruce Mitchell 

FROM: William Leffler, PE

DATE: June 20, 2001

SUBJECT **Montenay Bay LLC Request for authorization to burn special waste.**

Montenay Bay has requested authority to burn the following special wastes:

May 15, 2001: MBLLC/DEP 01-87 Eastman Filter Paper

Additional information provided **June 1, 2001: MBLLC/DEP-01-95**

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The material is identified as Lot 2BZ-J007 and produced by Carolina Eastman, located in Columbia, South Carolina.

Corrugated paper filters are used to clean wash water in the production of plastic resin. The paper is wet with water, but clogged with plastic resin dust which has excellent fuel value. It will be delivered in large paper boxes or poly super sacks, which will require breaking to be mixed and fed with MSW.

The Material Profile Form provided dated May 31, 2001, and provided with the June 1 supplement, describes the material as polyester dust and pellets. The precise speciation of the polyester is not disclosed nor is an anticipated quantity specified. The profile checks "no" for halogens, but provides no analysis. The presence of halogenated esters is not eliminated by the profile sheet.

The polyester resin has excellent fuel value, but it also has the potential to melt through the grates, if not adequately mixed with MSW.

The Carolina Eastman mill was the source of polyester resins previously rejected because of fire retardants, heavy metals and fiberglass.

Recommendation: Disallow pending analysis or additional information or analysis identifying the composition of the "polyester resin" and quantification of potential waste stream.

May 24, 2001: MBLLC/DEP-01-090 Bailed Carpet Trimmings

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The producer is Inter Face, located in Lagrange, GA. No lot number or other identifier is given.

It consists of Nylon and PVC up to 50% each. (Profile says 0.50% each; and, totals do not add up to 100%). It also contains some fiberglass. It is not

hazardous as a waste material, but incineration may result in very significant emissions of HCl. The chlorine block on the profile sheet is blank, whereas the Bromine, Iodine and Fluorine boxes are checked "no." Total organic content is checked <1%, which is clearly inconsistent with synthetic textiles.

Carpet scraps are a difficult fuel because of tangling or wadding, which interrupts uniform mixing and feeding. Synthetic textiles also tend to melt and drip through the grate, if not adequately mixed with MSW.

The quantity of this waste stream or lot is not specified.

Recommendation: Disallow because of high HCL potential and inconsistencies on face of profile.

June 1, 2000; MMBLLC/DEP-01-092 Canteen MSW and Carpet Trimmings

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The producer is Inter Face, located in Lagrange GA. No lot number or other identifier is given.

A mixed batch of Carpet Trimmings and MSW like material from the mill canteen. The lot or waste stream quantity are not specified. While the ultimate source is a different mill than the carpet trimmings, above, there is no assurance that a considerable portion of the waste stream is not Poly Vinyl Chloride. Profile sheet indicates 0% for Bromine, Iodine and Fluorine, but is unmarked for Chlorine. The waste profile sheet indicated <1% total organic carbon, which is clearly inconsistent with any textile except spun glass. The waste profile says no analytical data is attached.

Recommendation: Disallow because of insufficient information and inconsistencies on the face of the material profile sheet. Allow reconsideration with analysis and revised profile indicating absence of PVC or similar materials, and quantification of the waste stream.

Note Regarding PVC Incineration: Hydrogen chloride or hydrochloric acid (HCl) is formed from the combustion of waste material containing poly vinyl chloride plastics, While some poly vinyl chloride is found in ordinary MSW the chlorine content of ordinary MSW ranges from 0.13% to 0.20%. Poly vinyl chloride plastics typically have 35% chlorine liberated upon combustion. The specific emissions of hydrogen chloride from PVC would be 200 times the specific emission from ordinary MSW. Even if PVC waste was limited to 3% of the MSW fuel, and the special waste consisted of 50 % PVC, the emissions of HCl will increase by a factor of three, or more. Neither incinerator design, nor any operational practice will affect the amount of HCl generated from waste combustion. Alkali scrubbing (lime or caustic soda) will partially control emissions, but such control equipment is not present at the Panama City facility. The electrostatic scrubber is not only ineffective, but the high acid levels will cause accelerated deterioration of the ESP reducing both its efficiency and useful life. PVC incineration has been linked with dioxin and furan emissions. The emission factors appear to be linked to combustion temperature, stoichimetric conditions, and residence time. No reliable emission factors have been established for PVC combustion in the

Westinghouse rotary tube incinerators, but emission levels can be presumed to increase linearly with chlorine concentration.

For this reason wastes containing a high chlorine level such as poly vinyl chloride plastics are not "typical of municipal solid waste" as contemplated by condition A.5.1.8/(h) of the Title V Permit 050031-002-AV.

Additional Issues: This office has considered more than a dozen sources of 'special waste' in the past four months.

- What controls might we consider to prevent the simultaneous combustion or several special waste streams, each less than the three percent limit allowed by the permit, with a corresponding decrease in local MSW?
- What controls would be appropriate to assure that the waste being burned is the same as that represented by the waste profiles?

Ron Brookings in the Department's Panama City Branch Office was formerly the operations manager for this facility under Westinghouse. He is familiar with past determinations made on special wastes and says that there is a log book of analytical data on previously approved materials. I have agreed to copy him on all new requests for permission to burn "special waste". Ron and I agree that all special waste streams must be re-approved under a new title V permit and that old determinations do not "carry over." Nevertheless, the old authorizations could give us a basis for expedited review of some materials. Our "new look" position gives us an opportunity to review some hasty determinations that were made from insufficient waste profiles in the past, as well as an opportunity to set some standards requiring analysis and verification of the waste profile information.

Montenay Bay is under enforcement by the Northwest District for improper combustion methods. It arose from the practice of filling the combuster with flammable waste and tossing a railroad flare through the feeder ram. There was no preheating of the incinerator. The old oil ignition was not used, ostensibly because of costs; and, the supplemental gas fuel and ignition system are still in a permitting activity.

MONTENAY BAY LLC



6/1 Bruel
pk handle
Cler

RECEIVED

MAY 29 2001

BUREAU OF AIR REGULATION

6-4-01
@ 11:00

Handed to Bill to
evaluate & recommend
disposition. Ran

MBLLC/DEP-01-090

May 24, 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 Approval Consideration
Title V FINAL Permit No.: 0050031-002-AV


Dear Mr. Fancy:

Enclosed, please find a material profile, three pages, describing a waste stream for which we are seeking Approval.

For tracking purposes, this approval request is for Bailed Carpet Trimmings. We feel that this material meets condition A.5.1.8. (h).

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

Sincerely,


Chalmous Beechem
Operations Manager

cbeechem@montenaybay.com

Best Available Copy

Onyx Specialty Waste Services, Inc. (OSWS), Material Profile Form (MPF).			
Material Profile Form # _____		(Crossed areas are for OSWS use only.)	
Initials: _____		Date: _____	
Page 1 of 3			
Customer Code: _____	Generator Code: _____	Billing Code: _____	Approval Code(s): _____
Monteary Initiator: _____	Monteary Location(s): _____	Waste Processing Code(s): _____	
1.0 GENERATOR INFORMATION:			
1. Generator Company Name: <u>Inez Face</u>			
2. Address: <u>Orchard Hill Road</u>		3. City: <u>Lagrange</u>	
		4. State: <u>GA</u>	
5. Contact Name: <u>David Whiteley</u>		6. Zip: _____	
7. Tel # (706) 812-6193		8. Fax # (706) 884-8669	
9. E-Mail ID # _____			
10. Generator EPA ID # <u>Non-Haz</u> (If multiple locations and please attach relevant information)			
2.0 CUSTOMER BILLING INFORMATION:		3.0 PICK UP LOCATIONS:	
1. Company Name: <u>Strong Environmental, Inc.</u>		<input checked="" type="checkbox"/> If same as in Section 1.0 please check here	
2. Address: <u>6264 Crooked Creek Road, Sea LI</u>		1. Company Name: _____	
City: <u>Norcross</u>		2. Shipping Address: _____	
3. State: <u>Georgia</u>		3. City: _____	
4. Zip: <u>30092</u>		4. State: _____	
5. Billing Contact Name: <u>Scott Danner</u>		5. Zip: _____	
6. Billing Contact Title: <u>Sales</u>		6. Shipping Contact(s): _____	
7. Tel # (770) 409-1500		7. Tel # () _____	
8. Fax # (770) 409-1449		8. Fax # () _____	
9. E-Mail ID # <u>scott@strongenvironmental.com</u>		9. E-Mail ID # _____	
10. Federal Tax ID # for Billing Purpose: <u>58-2067743</u>		10. If multiple locations please attach a list	
4.0 THIRD PARTY AUTHORIZATION: (If appropriate please complete below)			
I, <u>David Whiteley</u> as an authorized representative of <u>Inez Face</u> (Generator Company)			
authorize <u>Scott Danner</u> of <u>Strong Environmental, Inc.</u> (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 Monteary facility.			
5.0 MATERIAL PROFILE FORM CHANGE AUTHORIZATION: (If appropriate please complete below)			
I, as the generator, authorize Monteary 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. <input type="checkbox"/> Yes <input type="checkbox"/> No _____ Initials			
6.0 REGULATORY WASTE INFORMATION:			
A. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This waste is A.C.R.A. Non Hazardous	I. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Explosive / Shock Sensitive		
B. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Regulated or Licensed Radioactive Waste	J. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Polymerizable Material		
C. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Medical / Infectious or Chemotherapeutic waste	K. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Air / Water Reactive		
D. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No OSHA Carcinogens (outline in waste constituents)	L. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Oxidizer / Reducer		
E. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated Benzene NESHAP Waste	M. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Cyanide _____ ppm		
F. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Asbestos Containing Waste	N. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Sulfide _____ ppm		
G. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Dioxin or Furan bearing Waste	O. Other applicable _____		
H. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Any type of PCB Waste			

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: Soiled Carpet Trimings
- 2. Process of Material or Waste generation: Scraps from carpet manufacturing
- 3. Total Quantity of Material / Waste: 2,000 (Circle) (Tons) gallons / 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 Range (Wt. %)
1. _____	_____	_____
2. <u>Nylon 6,6 fiber</u>	_____	<u>0 - 50%</u>
3. <u>PVC</u>	_____	<u>0 - 50%</u>
4. <u>Bitumen</u>	_____	<u>0 - 25%</u>
5. <u>Polyurethane</u>	_____	<u>0 - 25%</u>
6. <u>Polyester fiber</u>	_____	<u>0 - 2%</u>
7. <u>EVA latex</u>	_____	<u>0 - 5%</u>
8. <u>Fiberglass</u>	_____	<u>0 - 10%</u>
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 (only % of each state) Liquid _____% Sludge / Semi-solid _____% Solid 100% Powder _____% Gas _____%
- 2. Odor min (Describe) 3. Color varies (Describe) 4. No. of Phases: 1 Viscosity High Med Low
- 5. Flash Point: (Open & Non-Quoted) < 100°F 100° - 130°F 140° - 185°F > 200°F. Check if material is solid
- 7. pH (Aqueous Solution) or pH (Non-aqueous) ≤ 2.0 > 2.0 ≤ 5.0 > 5.0 ≤ 8.0 > 8.0 ≤ 12.0 ≥ 12.5
- 8. Corrosivity ≤ 0.25 mm/yr or > 0.25 mm/yr 9. Melting Point of Solids = 150°F. Compared to _____
- 10. Boiling Point of Liquids < 150°F, _____°F 11. Ignition Temp _____°F 12. TOC (Total Organic Carbon) < 1% 1-20% > 20%
- 13. BROMINE None or _____% 14. IODINE None or _____% 15. PHOSPHORUS None or _____% 16. CHLORINE None or _____%
- 17. VOC (Volatile Organic Compounds) _____% 18. Higher Heating Value (BTU/LB) _____ 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

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

7999 3400 0000 1453 1699

Article Sent To:
 Mr. Jon Mantey

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

Name (Please Print Clearly) (to be completed by mailer)
 Mr. Jon Mantey, County Admin., Bay County Bd. of CC.
 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

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 Mantey
 County Administrator
 Bay County Bd. of County Comm.
 310 West 6th St.
 Panama City, Fla 32401

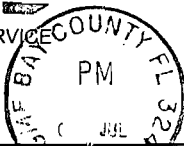
COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *Uplonda Kelley* B. Date of Delivery *7-9-01*
 C. Signature *x Uplonda Kelley* 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

2. Article Number (Copy from service label)
 7099 3400 0000 1453 1699

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
BUREAU OF AIR REGULATION
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box.

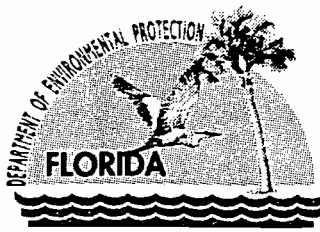
Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

Attn: Bruce Mitchell

RECEIVED
JUL 10 2001
BUREAU OF AIR REGULATION

2399+2400





Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

File Copy

July 3, 2001

CERTIFIED MAIL – Return Receipt Requested

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

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

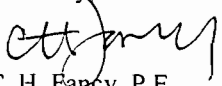
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If there are any questions, please give Mr. Bruce Mitchell a call at 850/413-9198 or write to me at the above letterhead address.

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
Martha Nebelsiek, Esq., DEP

"More Protection, Less Process"

Printed on recycled paper.

Memorandum

State of Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Bruce Mitchell 

FROM: William Leffler, PE

DATE: June 20, 2001

SUBJECT **Montenay Bay LLC Request for authorization to burn special waste.**

Montenay Bay has requested authority to burn the following special wastes:

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Additional information provided **June 1, 2001: MBLLC/DEP-01-95**

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The Carolina Eastman mill was the source of polyester resins previously rejected because of fire retardants, heavy metals and fiberglass.

Recommendation: Disallow pending analysis or additional information or analysis identifying the composition of the "polyester resin" and quantification of potential waste stream.

May 24, 2001: MBLLC/DEP-01-090 Bailed Carpet Trimmings

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hazardous as a waste material, but incineration may result in very significant emissions of HCl. The chlorine block on the profile sheet is blank, whereas the Bromine, Iodine and Fluorine boxes are checked "no." Total organic content is checked <1%, which is clearly inconsistent with synthetic textiles.

Carpet scraps are a difficult fuel because of tangling or wadding, which interrupts uniform mixing and feeding. Synthetic textiles also tend to melt and drip through the grate, if not adequately mixed with MSW.

The quantity of this waste stream or lot is not specified.

Recommendation: Disallow because of high HCL potential and inconsistencies on face of profile.

June 1, 2000; MMBLLC/DEP-01-092 Canteen MSW and Carpet Trimmings

This is a brokered waste from ONYX Specialty Waste, Inc., a related company to Montenay Bay LLC. The producer is Inter Face, located in Lagrange GA. No lot number or other identifier is given.

A mixed batch of Carpet Trimmings and MSW like material from the mill canteen. The lot or waste stream quantity are not specified. While the ultimate source is a different mill than the carpet trimmings, above, there is no assurance that a considerable portion of the waste stream is not Poly Vinyl Chloride. Profile sheet indicates 0% for Bromine, Iodine and Fluorine, but is unmarked for Chlorine. The waste profile sheet indicated <1% total organic carbon, which is clearly inconsistent with any textile except spun glass. The waste profile says no analytical data is attached.

Recommendation: Disallow because of insufficient information and inconsistencies on the face of the material profile sheet. Allow reconsideration with analysis and revised profile indicating absence of PVC or similar materials, and quantification of the waste stream.

Note Regarding PVC Incineration: Hydrogen chloride or hydrochloric acid (HCl) is formed from the combustion of waste material containing poly vinyl chloride plastics, While some poly vinyl chloride is found in ordinary MSW the chlorine content of ordinary MSW ranges from 0.13% to 0.20%. Poly vinyl chloride plastics typically have 35% chlorine liberated upon combustion. The specific emissions of hydrogen chloride from PVC would be 200 times the specific emission from ordinary MSW. Even if PVC waste was limited to 3% of the MSW fuel, and the special waste consisted of 50 % PVC, the emissions of HCl will increase by a factor of three, or more. Neither incinerator design, nor any operational practice will affect the amount of HCl generated from waste combustion. Alkali scrubbing (lime or caustic soda) will partially control emissions, but such control equipment is not present at the Panama City facility. The electrostatic scrubber is not only ineffective, but the high acid levels will cause accelerated deterioration of the ESP reducing both its efficiency and useful life. PVC incineration has been linked with dioxin and furan emissions. The emission factors appear to be linked to combustion temperature, stoichimetric conditions, and residence time. No reliable emission factors have been established for PVC combustion in the

Westinghouse rotary tube incinerators, but emission levels can be presumed to increase linearly with chlorine concentration.

For this reason wastes containing a high chlorine level such as poly vinyl chloride plastics are not “typical of municipal solid waste” as contemplated by condition A.5.1.8/(h) of the Title V Permit 050031-002-AV.

Additional Issues: This office has considered more than a dozen sources of ‘special waste’ in the past four months.

- What controls might we consider to prevent the simultaneous combustion or several special waste streams, each less than the three percent limit allowed by the permit, with a corresponding decrease in local MSW?
- What controls would be appropriate to assure that the waste being burned is the same as that represented by the waste profiles?

Ron Brookings in the Department’s Panama City Branch Office was formerly the operations manager for this facility under Westinghouse. He is familiar with past determinations made on special wastes and says that there is a log book of analytical data on previously approved materials. I have agreed to copy him on all new requests for permission to burn “special waste”. Ron and I agree that all special waste streams must be re-approved under a new title V permit and that old determinations do not “carry over.” Nevertheless, the old authorizations could give us a basis for expedited review of some materials. Our “new look” position gives us an opportunity to review some hasty determinations that were made from insufficient waste profiles in the past, as well as an opportunity to set some standards requiring analysis and verification of the waste profile information.

Montenay Bay is under enforcement by the Northwest District for improper combustion methods. It arose from the practice of filling the combuster with flammable waste and tossing a railroad flare through the feeder ram. There was no preheating of the incinerator. The old oil ignition was not used, ostensibly because of costs; and, the supplemental gas fuel and ignition system are still in a permitting activity.

6/4 Scott
pls handle

MONTENAY BAY LLC



RECEIVED

JUN 01 2001

BUREAU OF AIR REGULATION

MBLLC/DEP-01-092

May 30, 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 Approval Consideration
Title V FINAL Permit No.: 0050031-002-AV

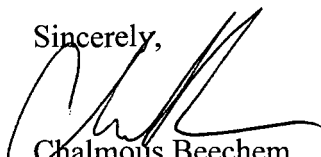
Dear Mr. Fancy:

Enclosed, please find a material profile, three pages, describing a waste stream for which we are seeking Approval.

For tracking purposes, this approval request is for Canteen MSW and Carpet Trimmings. We feel that this material meets condition A.5.1.8. (h).

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

Sincerely,



Chalmous Beechem
Operations Manager

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): _____
Montenay Initiator: _____ Montenay Location(s): _____ Waste Processing Code(s): _____

1.0 GENERATOR INFORMATION :

1. Generator Company Name: Milliken & Company - M485 Department
2. Address: 920 Milliken Road 3 City: Spartanburg 4.State: SC 5.Zip: 29304
6. Contact Name: Dick Verch
7. Tel #: (770) 409-1500 8. Fax #: (770) 409-1449 9. E - Mail ID #: _____ @ _____
10. Generator EPA ID #: _____ (If multiple locations exist please attach relevant information)

2.0 CUSTOMER BILLING INFORMATION:

1. Company Name: Strong Environmental, Inc.
2. Address: 6264 Crooked Creek Road, Suite 11
City: Norcross
3. State: Georgia 4. Zip: 30092
5. Billing Contact Name: Dick Verch
6. Billing Contact Title: Vice President
7. Tel #(s) (770) 409-1500
8. Fax #(s) (770) 409-1449
9. E - Mail ID #: _____ @ _____
10. Federal Tax ID # for Billing Purposes: 58-2047743

3.0 PICK UP LOCATIONS:

If same as in Section 1.0 please check here
1. Company Name: Waste Management-Transfer Station
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 Montenay 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 YES NO Initials: _____

6.0 REGULATORY WASTE INFORMATION:

- | | |
|---|---|
| A. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO This waste is R.C.R.A. Non Hazardous | I. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Explosives / Shock Sensitive |
| B. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Regulated or Licensed Radioactive Waste | J. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Polymerizable Material |
| C. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Medical / Infectious or Chemotherapeutic Waste | K. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Air / Water Reactive |
| D. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO OSHA Carcinogens (outline in waste constituents) | L. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Oxidizer / Reducer |
| E. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Regulated Benzene NESHAP Waste | M. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Total Cyanide _____ ppm |
| F. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Asbestos Containing Waste | N. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Total Sulfide _____ ppm |
| G. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Dioxin or Furan bearing Waste | O. Other applicable _____ |
| H. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Any type of PCB Waste | |

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 : Canteen MSW & Carpet Trimmings
 2. Process of Material or Waste generation: _____
 3. Total Quantity of Material / Waste: _____ (Circle) Tons pallets / drums / other : Explain 350 Tons Per Mo.
 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. <u>Canteen Waste (MSW)</u>	<u>Paper Towels, Plastic Drink Bottles (Coke) Soft Drink Cans Boxes, Food Wrappers</u>	<u>20-50%</u>
2. _____	_____	_____
3. _____	_____	_____
4. <u>Carpet Trimmings, etc.</u>	<u>Scrap Trimmings Spools, Textile Scraps</u>	<u>50-80%</u>
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 Normal (Describe) 3. Color Mixed (Describe) 4. No. of Phases : N/A 5. Viscosity High Med Low
 6. Flash Point (Liquids & Non-liquids) < 100°F 100° - 139°F 140° - 199°F ≥ 200°F. Check if material is solid
 7. pH (Aqueous Liquids) or pI (Non-aqueous) N/A ≤ 2.0 > 2.0 ≤ 5.0 > 5.0 ≤ 8.8 > 8.0 ≤ 12.49 ≥ 12.5
 8. Corrosivity ≤ 6.35 mm/yr or > 6.35 mm/yr 9. Melting Point of Solids < 130°F. Compared to N/A
 10. Boiling Point of Liquids < 130°F. N/A °F. 11. Ignition Temp. N/A °F. 12. TOC (Total Organic Carbon) < 1% 1-20% > 20%
 13. BROMINE None or 0 % 14. IODINE None or 0 % 15. FLUORINE None or 0 % 16. CHLORINE None or _____ %
 17. VOC (Volatile Organic Compounds) _____ % 18. Higher Heating Value (BTUs/Lb) 6,000-8,000 Estimated Exact 19. Ash: _____ %
 20. SULFUR _____ % 21. NITROGEN 0 % 22. Specific Gravity N/A or Bulk Density N/A Lb./Gal.
 23. Free liquids present Yes No. 24. Free liquids are fully absorbed Yes No. Absorbent type N/A _____ %
 25. Analytical is attached Yes No. TCLP Total Metals Flash Pt. BTU/lb Wt % Halogen / Sulfur

Just MSW Solid Waste

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)

- Consumer Packaged Returns _____
- Consumer packaged > 500 lbs _____
- Consumer packaged truckload _____
- Raw material inert or active (100%) _____
- Plant Trash _____
- Finished product bulk _____
- Intermediate waste _____
- Production Debris _____
- Mixed Powders _____
- Paper waste _____
- Fiber drums _____
- Poly drums _____
- Steel drums _____
- Gaylords _____
- Roll-offs _____
- Dump-trailers _____
- Vac truck _____
- Walking trailer _____

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 <u>0</u> mg/kg	Chromium <u>0</u> mg/kg	Nickel <u>0</u> mg/kg
Antimony <u>0</u> mg/kg	Chromium VI <u>0</u> mg/kg	Selenium <u>0</u> mg/kg
Arsenic <u>0</u> mg/kg	Copper <u>0</u> mg/kg	Silver <u>0</u> mg/kg
Barium <u>0</u> mg/kg	Lead <u>0</u> mg/kg	Zinc <u>0</u> mg/kg
Beryllium <u>0</u> mg/kg	Mercury <u>0</u> mg/kg	Cadmium <u>0</u> mg/kg
Molybdenum <u>0</u> mg/kg	If none are present please check here. NONE <input checked="" type="checkbox"/>	

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

Titanium 0 % , Silicon 0 % , Aluminum & Zirconium Salts 0 % , Free Cyanides 0 ppm , Free Sulfides 0 ppm,
 Free Ammonia 0 ppm, Cresols 0 Total, Formaldehyde 0 , Phenol 0 .
 If none are present please check here. **NONE**

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

- Aerosols Oil Contamination Teflon / PTFE FIFRA Regulated Pesticides Isocyanates Sharps
 - Organic Solvent Contamination DEA Materials DOT Regulated material Acrylates
 - Nicotine or salts Contaminated Empty Containers Fiberglass waste Carbon and Carbon Filtration waste
 - Saccharin or salts Un-contaminated Empty Containers Leather Waste Paint / Varnish Contaminated waste
- If none are present please check here. **NONE**

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: _____

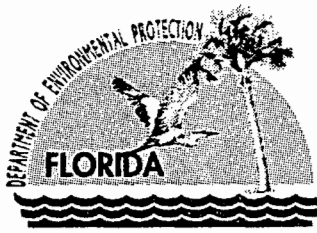
Richard Vercht

Name & Title (Printed or Typed): _____

R. VERCHT

Date: _____

5/25/01



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 6th Street
Panama City, Florida 32401

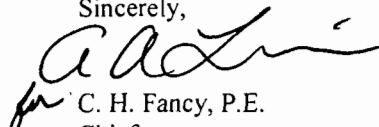
RE: Request for Approval of a Segregated Bulk Waste Material
Bay County Resource Recovery Facility
0050031-002-AV

Dear Ms. Bates:

The Department has evaluated Mr. Chalmous Beechem's letter received July 29th, 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

"More Protection, Less Process"

Printed on recycled paper.

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 Cottdale, 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 Becchem
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.) Inflation 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 Recycle Oil (MRO)
2. Address: 3053 Barnstable 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. Yes No Jm Initials

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

3. Total Quantity of Material / Waste: 6 ton month (Circle) Ave 8 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 (Liquid & Non-liquid) < 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/cool.

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

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 - 900 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	dump truck (6 tons)	

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 / 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 Cyanide _____ ppm Free Sulfides _____ ppm
 Free Cyanide _____ ppm Cresols _____ Total, Formaldehy, de _____ Chloro _____
 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"/>	Toxion / 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
Cottdale, 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

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

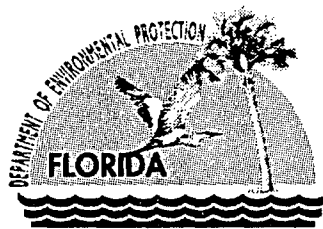
Fax History Report for
Montenay Bay LLC
(850)784-1779
Jul 10 2002 10:04am

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



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 29th, 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

"More Protection, Less Process"

Printed on recycled paper.

MONTENAY BAY LLC



RECEIVED

JUL 29 2002

MBLLC/DEP-02-086

BUREAU OF AIR REGULATION

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

8-5-02
01146
left Mr. Beechem
a v-m-m to call me.

SUBJECT: Waste Approval Consideration
Title V FINAL Permit No.: 0050031-002-AV
Approval number 00302

01144
Mr. Beechem left
me a v-m-m.

Dear Mr. Fancy:

Per a telephone conversation with Bruce Mitchell, I am submitting for consideration a waste stream consisting of oil absorbent, per section A.5.1.8.(f) of permit, processed by Buckeye Technologies of Perry, Fl. Amount delivered would be sixty tons total, five tons per week, if approved. Enclosed, please find seven 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

8-5-02
02:01-107
Spoke w Mr. Beechem -
the company (BT) has been
holding this material for
some time - trying to find
a suitable disposal site.

8-5-02
01147-157
Spoke w Carla Ferguson
w Buckeye Fla to help
me to understand where
this waste stream is coming
from. Bm

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Clarity Paper Machine Oil ISO 100 MSDS #6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 1 of 7

#422



Material Safety Data Sheet

- Click on the product name to go to the Salesfax description sheet.
- Click on the grade to go to the Salesfax typical test data sheet.

HEALTH	0
FIRE	1
REACTIVITY	2

Chevron Clarity® Paper Machine Oil ISO

100, 150, 220, 320, 460

MSDS: 6680 Revision #: 1 Revision Date: 01/03/98

received
01/20/00

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON Clarity Paper Machine Oil

PRODUCT NUMBER(S): CPS25505C CPS255075 CPS255076 CPS26617W
CPS266182

SYNONYM: CHEVRON Clarity Paper Machine Oil ISO 100
 CHEVRON Clarity Paper Machine Oil ISO 150
 CHEVRON Clarity Paper Machine Oil ISO 220
 CHEVRON Clarity Paper Machine Oil ISO 320
 CHEVRON Clarity Paper Machine Oil ISO 460

COMPANY IDENTIFICATION

Chevron Products Company
 Global Lubricants
 555 Market St.
 Room 803
 San Francisco, CA 94105-2870

EMERGENCY TELEPHONE NUMBERS

HEALTH (24 hr): (800) 231-0623 or
 (510) 231-0623 (International)
 TRANSPORTATION (24 hr): CHEMTREC
 (800) 424-9300 or (703) 527-3887
 Emergency Information Centers
 are located in U.S.A.
 Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Requests: (800) 228-3500
 Environmental, Safety, & Health Info: (415) 894-0703
 Product Information: (800) 582-3835

SPECIAL NOTES: This MSDS is for the entire line of CHEVRON Clarity Paper Machine Oil products.

2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON Clarity Paper Machine Oil

CONTAINING

COMPONENTS	AMOUNT	LIMIT/QTY	AGENCY/TYPE
LUBRICATING BASE OIL SEVERELY REFINED PETROLEUM DISTILLATE	> 98.00%	5 mg/m3 (mist)	ACGIH TWA

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Clarity Paper Machine Oil/ISO 100 MSDS #6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 2 of 7

10 mg/m3 (mist); ACGIH STEL
5 mg/m3 (mist) OSHA PEL

The BASE OIL may be a mixture of any of the following: CAS 64741884, CAS 64741895, CAS 64741964, CAS 64741975, CAS 64742014, CAS 64742525, CAS 64742536, CAS 64742547, CAS 64742627, CAS 64742650, or CAS 72623837.

ADDITIVES

< 2.0%

COMPOSITION COMMENT:

All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

POTENTIAL HEALTH EFFECTS

EYE:

Not expected to cause prolonged or significant eye irritation.

SKIN:

Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.

INGESTION:

Not expected to be harmful if swallowed.

INHALATION:

Contains a petroleum-based mineral oil that may cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of airborne levels above the recommended exposure limit.

4. FIRST AID MEASURES

EYE:

No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.

SKIN:

No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse.

INGESTION:

No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person.

INHALATION:

If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

5. FIRE FIGHTING MEASURES

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Clarity Paper Machine Oil; SO 100 MSDS#6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 3 of 7

FIRE CLASSIFICATION:

Classification (29 CFR 1910.1200) : Not classified by OSHA as flammable or combustible.

FLAMMABLE PROPERTIES:

FLASH POINT: (COC) 446F (230C) Min.

AUTOIGNITION: NDA

FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA

EXTINGUISHING MEDIA:

CO2, Dry Chemical, Foam, Water Fog

NFPA RATINGS: Health 0; Flammability 1; Reactivity 0.

FIRE FIGHTING INSTRUCTIONS:

This material will burn although it is not easily ignited.

COMBUSTION PRODUCTS:

Normal combustion forms carbon dioxide and water vapor; incomplete combustion can produce carbon monoxide.

6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr) : (800)424-9300 or (703)527-3887

International Collect Calls Accepted

ACCIDENTAL RELEASE MEASURES:

Stop the source of the leak or release. Clean up releases as soon as possible, observing precautions in Exposure Controls/Personal Protection. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

7. HANDLING AND STORAGE

Do not use pressure to empty drum or drum may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty drums should be completely drained, properly bunged, and promptly returned to a drum reconditioner, or properly disposed of.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION**ENGINEERING CONTROLS**

Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended exposure limits.

PERSONAL PROTECTIVE EQUIPMENT**EYE/FACE PROTECTION:**

No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice.

SKIN PROTECTION:

No special protective clothing is normally required. Where splashing is possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for

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Clarity Paper Machine OIL ISO 100 MSDS #6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 4 of 7

protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H>

RESPIRATORY PROTECTION:

No special respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended exposure limits. If not, select a NIOSH/MSHA approved respirator that provides adequate protection from concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES**PHYSICAL DESCRIPTION:**

Clear, light amber liquid.

pH: NDA

VAPOR PRESSURE: NA

VAPOR DENSITY

(AIR=1): NA

BOILING POINT: NDA

FREEZING POINT: NDA

MELTING POINT: NA

SOLUBILITY: Soluble in hydrocarbon solvents; insoluble in water.

SPECIFIC GRAVITY: 0.88 - 0.90 @ 15.6/15.6C

VOLATILE ORGANIC

COMPOUNDS (VOC): 1.2 wt. %; 10.84g/l (estimated) ASTM D 2369

EVAPORATION RATE: NA

VISCOSITY: 90 - 414 cst @ 40C (min.)

PERCENT VOLATILE

(VOL): NA

10. STABILITY AND REACTIVITY**HAZARDOUS DECOMPOSITION PRODUCTS:**

No data available.

CHEMICAL STABILITY:

Stable.

CONDITIONS TO AVOID:

No data available.

INCOMPATIBILITY WITH OTHER MATERIALS:

May react with strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.

HAZARDOUS POLYMERIZATION:

Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION**EYE EFFECTS:**

The eye irritation hazard is based on data for a similar material.

SKIN EFFECTS:

The skin irritation hazard is based on data for a similar material.

ACUTE ORAL EFFECTS:

The acute oral toxicity is based on data for a similar material.

ACUTE INHALATION EFFECTS:

The acute respiratory toxicity is based on data for a similar material.

ADDITIONAL TOXICOLOGY INFORMATION:

This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under

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Clarity Paper Machine Oil ISO 100 MSDS #6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 5 of 7

the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

12. ECOLOGICAL INFORMATION

ECOTOXICITY:

The 96-hour LC50 for rainbow trout (*Oncorhynchus mykiss*) is >1000 mg/l WAF. The 96-hour LC50 for mysid shrimp (*Mysidopsis bahia*) is >5000 mg/l WAF.

ENVIRONMENTAL FATE:

This material is considered inherently biodegradable. Small accidental leaks or releases of this material are not expected to present an environmental problem. See Section 6 for Accidental Release Measures.

13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NOT DESIGNATED AS A HAZARDOUS MATERIAL BY THE FEDERAL DOT
 DOT HAZARD CLASS: NOT APPLICABLE
 DOT IDENTIFICATION NUMBER: NOT APPLICABLE
 DOT PACKING GROUP: NOT APPLICABLE

15. REGULATORY INFORMATION

SARA 311 CATEGORIES:

1. Immediate (Acute) Health Effects:	NO
2. Delayed (Chronic) Health Effects:	NO
3. Fire Hazard:	NO
4. Sudden Release of Pressure Hazard:	NO
5. Reactivity Hazard:	NO

REGULATORY LISTS SEARCHED:

01=SARA 313	11=NJ RTK	22=TSCA Sect 5(a)(2)
02=MASS RTK	12=CERCLA 302.4	23=TSCA Sect 6
03=NTP Carcinogen	13=MN RTK	24=TSCA Sect 12(b)
04=CA Prop 65-Carcin	14=ACGIH TWA	25=TSCA Sect 8(a)
05=CA Prop 65-Repro Tox	15=ACGIH STEL	26=TSCA Sect 8(d)

<http://library.cbeest.chevron.com/lubes/c.../7b1fc259538574288825647c000474f0?OpenDocument> 2/8/00

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Clarity Paper Machine Oil/ISO 100 MSDS#6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 6 of 7

- 06=IARC Group 1
- 07=IARC Group 2A
- 08=IARC Group 2B
- 09=SARA 302/304
- 10=PA RTK
- 16=ACGIH Calc TLV
- 17=OSHA PEL
- 18=DOT Marine Pollutant
- 19=Chevron TWA
- 20=EPA Carcinogen
- 27=TSCA Sect 4(a)
- 28=Canadian WHMIS
- 29=OSHA CEILING
- 30=Chevron STEL

The following components of this material are found on the regulatory lists indicated.

SEVERELY REFINED PETROLEUM DISTILLATE is found on lists: 14,15,17,

NEW JERSEY RTK CLASSIFICATION: Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows:

PETROLEUM OIL

WHMIS CLASSIFICATION:

This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

16. OTHER INFORMATION

NFPA RATINGS: Health 0; Flammability 1; Reactivity 0;
HMIS RATINGS: Health 0; Flammability 1; Reactivity 0;
(0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT: This revision updates Section 1, 6, and 9.

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:
TLV - Threshold Limit Value
STEL - Short-term Exposure Limit
RQ - Reportable Quantity
C - Ceiling Limit
Al-5 - Appendix A Categories
NDA - No Data Available
TWA - Time Weighted Average
TPQ - Threshold Planning Quantity
PEL - Permissible Exposure Limit
CAS - Chemical Abstract Service Number
() - Change Has Been Proposed
NA - Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

THIS IS THE LAST PAGE OF THIS MSDS

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Clarity Paper Machine Oil:ISO 100 MSDS#6680 Rev#1 (01/0.../98), Clarity Paper Machine Page 7 of 7

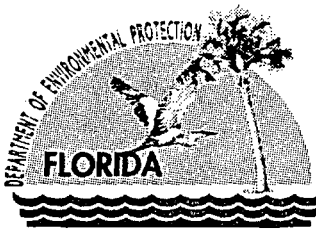
Mitchell, Bruce

From: Moose Beechem [cbeechem@montenaybay.com]
Sent: Wednesday, August 28, 2002 12:53 PM
To: Mitchell, Bruce
Subject: Pharmaceutical approval

Mr. Mitchell,

Just wanted to thank you for the prompt response on my last approval letter.

Thank you,
Moose Beechem



Jeb Bush
Governor

Department of Environmental Protection

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 13th, 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

"More Protection, Less Process"

Printed on recycled paper.

MONTENAY BAY LLC



RECEIVED

AUG 13 2002

BUREAU OF AIR REGULATION

MBLLC/DEP-02-094

August 9, 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 00402

Dear Mr. Fancy:

Per an email to Bruce Mitchell , I am submitting for consideration a waste stream consisting of offspec/returned consumer packaged pharmaceuticals, per section A.5.1.8.(c) of permit, processed by Ranbaxy Pharmaceuticals. Amount delivered would be twenty tons per year, if approved. Enclosed, please find four pages of additional information.

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", written over a horizontal line.

Chalmous Beechem
Operations Manager

cc Bruce Mitchell, FLDEP

RANBAXY PHARMACEUTICALS

ROSTER OF PRODUCTS FOR DESTRUCTION

Acyclovir	Amoxicillin
Cefactor	Cefadroxil
Cephalexin	Doxycycline
Enalpril	Etodalac
Guafensin	Nalfon
Ranitidine	Salsalate

RECEIVED
AUG 13 2002
BUREAU OF AIR REGULATION

NOTE: all of the above referenced, consumer-packaged, non-regulated pharmaceutical finished products are approved for disposal at Montenay Energy Resources of Montgomery County, Inc.

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: Ranbaxy Pharmaceuticals
 2. Address: 4801 Executive Blvd. Cont. 1 3. City: Jacksonville 4. State: FL 5. Zip: 32216
 6. Contact Name: Peter Medina
 7. Tel #: 904-470-6011 B. Fax #: _____ 9. E-Mail ID #: _____
 10. Generator EPA ID #: N/A (If multiple locations exist please attach relevant information)

2.0 CUSTOMER BILLING INFORMATION:
 1. Company Name: SDS
 2. Address: 115 Rt. 46W Suite E37-38
 City: Mountain Lakes
 3. State: NJ 4. Zip: 07046
 5. Billing Contact Name: Karen Renken
 6. Billing Contact Title: Accounts Payable
 7. Tel #(s) (73) 402-9246
 8. Fax #(s) (973) 335-5833
 9. E-Mail ID #: _____
 10. Federal Tax ID # for Billing Purposes: _____

3.0 PICK UP LOCATIONS:
 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, Peter Medina as an authorized representative of Ranbaxy Pharmaceuticals (Generator Company) authorize Vicor DNO of Specialty Disposal Services (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. Yes No PM Initials

6.0 REGULATORY WASTE INFORMATION:

A. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This waste is R.C.R.A. Non Hazardous	I. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Explosives / Shock Sensitive
B. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated or Licensed Radioactive Waste	J. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Polymerizable Material
C. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Medical / Infectious or Chemotherapeutic Waste	K. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Air / Water Reactive
D. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No OSHA Carcinogens (outline in waste constituents)	L. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Oxidizer / Reducer
E. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated Benzene NESHAP Waste	M. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Cyanide _____ ppm
F. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Asbestos Containing Waste	N. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Sulfide _____ ppm
G. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Dioxin or Furan bearing Waste	O. Other applicable _____
H. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Any type of PCB Waste	

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: _____
 2. Process of Material or Waste generation: offspec / returned finished pharmaceuticals
 3. Total Quantity of Material / Waste: 20 (Circle) Tris 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. <u>please see list</u>		
2.		
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 none (Describe) 3. Color white (Describe) 4. No. of Phases: 1 Viscosity High Med Low
 6. Flash Point (Liquids & non-liquids) < 100°F 100° - 139°F 140° - 199°F ≥ 200°F. Check # material is solid
 7. pH (Aqueous / Nulids) or pH (Non aqueous) ≤ 2.0 > 2.0 ≤ 5.0 > 5.0 ≤ 8.9 > 8.0 ≤ 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. NA °F. 11. Ignition Temp. > 100 °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) 10 % 18. Higher Heating Value (BTUs/LB) < 2000 Estimated Exact 19. Ash: _____ %
 20. SULFUR 0 % 21. NITROGEN 0 % 22. Specific Gravity > 1.0 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

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 checked="" type="checkbox"/> Consumer Packaged Returns <u>100</u>	<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"/> Intermediate 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		

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

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

Aluminum <u>0</u> mg/kg	Chromium <u>0</u> mg/kg	Nickel <u>0</u> mg/kg
Antimony <u>0</u> mg/kg	Chromium VI <u>0</u> mg/kg	Selenium <u>0</u> mg/kg
Arsenic <u>0</u> mg/kg	Copper <u>0</u> mg/kg	Silver <u>0</u> mg/kg
Barium <u>0</u> mg/kg	Lead <u>0</u> mg/kg	Zinc <u>0</u> mg/kg
Beryllium <u>0</u> mg/kg	Mercury <u>0</u> mg/kg	Cadmium <u>0</u> mg/kg
Molybdenum <u>0</u> mg/kg	If none are present please check here. <input checked="" type="checkbox"/> None	

11.2 Additional Materials of concern to MREWS: 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 _____ Phenol _____
 If none are present please check here. None

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

Aerosols <input type="checkbox"/>	Oil Contamination <input 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 type="checkbox"/>	Acrylates <input type="checkbox"/>		
Nicotine or salts <input type="checkbox"/>	Contaminated Empty Containers <input type="checkbox"/>	Fiberglass Waste <input type="checkbox"/>	Carbon and Carbon Filtration waste <input type="checkbox"/>		
Seachrin 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.				<input checked="" type="checkbox"/> None	

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: *Victor D'Ino* Date: 8-8-02
 Name & Title (Printed or Typed): Victor D'Ino Operations Mgr

MONTENAY BAY LLC



RECEIVED

AUG 13 2002

BUREAU OF AIR REGULATION

MBLLC/DEP-02-094

August 9, 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 00402

Dear Mr. Fancy:

Per an email to Bruce Mitchell, I am submitting for consideration a waste stream consisting of offspec/returned consumer packaged pharmaceuticals, per section A.5.1.8.(c) of permit, processed by Ranbaxy Pharmaceuticals. Amount delivered would be twenty tons per year, if approved. Enclosed, please find four pages of additional information.

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', written over a horizontal line.

Chalmous Beechem
Operations Manager

✓ cc Bruce Mitchell, FLDEP

RANBAXY PHARMACEUTICALS

ROSTER OF PRODUCTS FOR DESTRUCTION

Acyclovir	Amoxicillin
Cefactor	Cefadroxil
Cephalexin	Doxycycline
Enalpril	Etodalac
Guafensin	Nalfon
Ranitidine	Salsalate

NOTE: all of the above referenced, consumer-packaged, non-regulated pharmaceutical finished products are approved for disposal at Montenay Energy Resources of Montgomery County, Inc.

Best Available Copy

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: Ranbaxy Pharmaceuticals
 2. Address: 4801 Executive Blvd, Court 3 City: Jacksonville 4. State: FL 5. Zip: 32216
 6. Contact Name: Peter Medina
 7. Tel #: 904-470-6011 B. Fax #: _____ 9. E-Mail ID #: _____
 10. Generator EPA ID #: N/A (If multiple locations exist please attach relevant information)

2.0 CUSTOMER BILLING INFORMATION:
 1. Company Name: SDS
 2. Address: 115 Rt. 4600 Suite E37-38
 City: Mantain Lakes
 3. State: NJ 4. Zip: 07046
 5. Billing Contact Name: Karen Ranken
 6. Billing Contact Title: Accounts Payable
 7. Tel # (s): (973) 402-9246
 8. Fax # (s): (973) 335-5833
 9. E-Mail ID #: _____
 10. Federal Tax ID # for Billing Purposes: _____

3.0 PICK UP LOCATIONS:
 If same as in Section 1.0 please check here
 1. Company Name: _____
 2. Shipping Address: _____
 3. City: _____ 4. State: _____ 6. Zip: _____
 5. 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, Peter Medina as an authorized representative of Ranbaxy Pharmaceuticals (Generator Company) authorize Onyx Specialty Waste Services (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. Yes No PM Initials

6.0 REGULATORY WASTE INFORMATION:

A. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This waste is R.C.R.A. Non Hazardous	I. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Explosives / Shock Sensitive
B. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated or Licensed Radioactive Waste	J. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Polymerizable Material
C. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Medical / Infectious or Chemotherapeutic Waste	K. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Air / Water Reactive
D. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No OSHA Carcinogens (outline in waste constituents)	L. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Oxidizer / Reducer
E. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Regulated Benzene NESHAP Waste	M. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Cyanide _____ ppm
F. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Asbestos Containing Waste	N. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Total Sulfide _____ ppm
G. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Dioxin or Furan bearing Waste	O. Other applicable _____
H. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Any type of PCB Waste	

Best Available Copy

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: _____
 2. Process of Material or Waste generation: offspec / returned finished pharmaceuticals
 3. Total Quantity of Material / Waste: 20 (Circle) Trms 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. <u>please see list</u>		
2.		
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.

8.0 MATERIAL / WASTE PROPERTIES AT ROOM TEMPERATURE:

1. Physical State and % of each state: Liquid % Sludge / Semi-solid % Solid 100% Powder % Gas %
 2. Odor None (Describe) 3. Color White (Describe) 4. No. of Phases: 1 Viscosity High Med Low
 6. Flash Point (Liquid & non-Liquid) < 100°F 100° - 130°F 140° - 199°F ≥ 200°F. Check if material is solid
 7. pH (Aqueous Liquid) 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 < 120°F. Compared to _____
 10. Boiling Point of Liquids < 130°F. NA °F. 11. Ignition Temp. > 200 °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) 10 % 18. Higher Heating Value (BTUs/Lb) > 2000 Estimated Exact 19. Ash: _____ %
 20. SULFUR 0 % 21. NITROGEN 0 % 22. Specific Gravity > 1.0 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 checked="" type="checkbox"/> Consumer Packaged Returns <u>100</u>	<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"/> Intermediate 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		

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 <u>0</u> mg/kg	Chromium <u> </u> mg/kg	Nickel <u> </u> mg/kg
Antimony <u>0</u> mg/kg	Chromium VI <u> </u> mg/kg	Selenium <u> </u> mg/kg
Arsenic <u>0</u> mg/kg	Copper <u> </u> mg/kg	Silver <u> </u> mg/kg
Berium <u>0</u> mg/kg	Lead <u> </u> mg/kg	Zinc <u> </u> mg/kg
Beryllium <u> </u> mg/kg	Mercury <u> </u> mg/kg	Cadmium <u> </u> mg/kg
Molybdenum <u> </u> mg/kg	If none are present please check here.	

None

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

Titanium %, Silicon %, Aluminum & Zirconium Sulfate %, Free Cyanides ppm, Free Sulfides ppm.
 Free Ammonia ppm, Cresols Total, Formaldehyde Phtenol

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 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 type="checkbox"/>	Acrylates <input type="checkbox"/>		
Nicotine or salts <input type="checkbox"/>	Contaminated Empty Containers <input type="checkbox"/>	Fiberglass Waste <input type="checkbox"/>	Carbon and Carbon Filtration waste <input type="checkbox"/>		
Secobarb 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

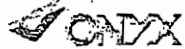
12.0 GENERATOR CERTIFICATION (This section must be signed prior to the completion of any review)

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:  Date: 8-8-02

Name & Title (Printed or Typed): Victor DINO Operations mgr

MONTENAY BAY LLC



12-2001 adopted
12-2002 from subject
12-2004 effective
12-6-2005
11-2005

FACSIMILE TRANSMITTAL SHEET

TO: BRUCE MITCHELL

FROM: MOOSE BECKHAM

COMPANY: FLDEP

EXTENSION: 206

DATE: 8/12/02

FAX NUMBER: 850-922-6979

SUBJECT: PHARMACEUTICAL WASH STREAM

APPROVAL # 00402

ROSTER OF PRODUCTS

URGENT

NOTES / COMMENTS

FOR REVIEW

QUOTATION

REPLY REQUEST

CONFIRMATION

RANBAXY PHARMACEUTICALS

ROSTER OF PRODUCTS FOR DESTRUCTION

Acyclovir

Amoxicillin

Cefactor

Cefadroxil

Cephalexin

Doxycycline

Enalpril

Etodalac

Guafensin

Nalfon

Ranitidine

Salsalate

NOTE: all of the above referenced, consumer-packaged, non-regulated pharmaceutical finished products are approved for disposal at Montenay Energy Resources of Montgomery County, Inc.

Mitchell, Bruce

From: Moose Beechem [cbeechem@montenaybay.com]
Sent: Monday, September 16, 2002 1:54 PM
To: Mitchell, Bruce
Subject: waste approval

Mr. Mitchell,

Just wanted to thank you for the timely response on the carpet manufacturing remnants. Even though the request was denied, I still appreciate the quick turn around.

Thanks,
Moose Beechem



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 29th, 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.

MONTENAY BAY LLC



Bruce

SAL
9B

RECEIVED

AUG 29 2002

BUREAU OF AIR REGULATION

MBLLC/DEP-02-101

August 28, 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 00502, Cushion Tile Products

Dear Mr. Fancy:

Per an email to Bruce Mitchell , I am submitting for consideration a waste stream consisting of carpet manufacturing remnants, Cushion Tile Products, per section A.5.1.6.(f) of permit, manufactured by Milliken Carpet. Amount delivered would be 350 tons per month, if approved. Enclosed, please find eight pages of additional information.

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', written over a horizontal line.

Chalmous Beechem
Operations Manager

cc Bruce Mitchell, FLDEP

COMMERCIAL MARKETS

Modular/Custom

300 Lukken Industrial Dr. W.
LaGrange, Georgia USA 30240
800. 241. 4826 TOLL FREE
706. 880. 5338 FAX

Jon Williamson
Milliken & Co.
Liveoak Complex
300 Lukken Industrial Dr.
LaGrange, Ga. 30240
706-880-5922 Phone

Milliken Carpet

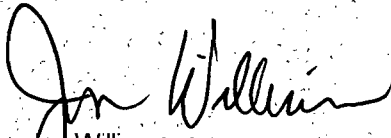
August 15, 2002

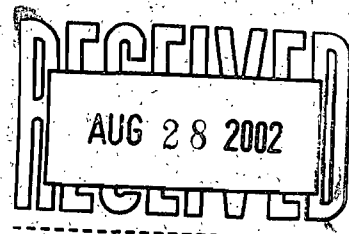
Montenay Power Corporation
Route 8, Box 757
Lake City, Fl. 32055

Dear Mr. Bennett:

Pursuant to a request from Montenay Power Corporation concerning the status of PCBs or PVC in our cushion tile products, we sent our tile products for testing. The lab results didn't show any detectable quantities of either PCBs or PVC. The test results are attached. I hope this addresses all of your concern. If you have further questions, please call me at 706-880-5922!

Sincerely,


Jon Williamson
Development Manager





Chris Kirk
08/13/2002 10:10 AM

To: Jon Williamson, Mary Crenshaw
cc:
Subject: Gold and Midnight Carpet Tiles

MILLIKEN RESEARCH CORPORATION, ANALYTICAL CHEMISTRY DEPARTMENT

Request No.: 20441
Date Submitted: 5/22/2002
Date Reported: 6/13/2002

Submitted By: Jon Williamson
Location: Kex Labs M-003

Processed By: Chris Kirk (M-425, X-1688)

Subject: Gold and Midnight Carpet Tiles

Background and Work Requested:

look for PVC on one of these carpet squares (they are all the same type).

Samples Evaluated:

1. midnight sparkle s-02096

Results and Conclusions:

Infrared analysis of the tiles showed a Polyurethane foam, and a Styrene/Butadiene primary adhesive filled with Calcium Carbonate in both samples.

We were unable to see any evidence of PVC.



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Report Number **157142**

Prepared For:
Milliken & Co. - Live Oak
300 Lukken Industrial Dr. W
LaGrange, GA 30240

Attention: Ms. Mary C. Crenshaw

May 30, 2002

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.


Project Manager


Quality Assurance

cc: Mr. Glenn Stoner

Analytical Services Inc., Norcross Laboratory maintains the following certifications, approvals, and accreditations:
Georgia (812); NELAC (E87315) scope: CWA, SDWA, RCRA expires July 1, 2002; NSF International (D4160) scope: SDWA expires August 17, 2002; Arkansas;
California (01160CA); Connecticut (PH-0260); Florida (E87315); Kansas (E-10334); Kentucky (00126); Louisiana (02089); New Jersey (GA001); New York
(11762); North Carolina (381); Oklahoma (9907); South Carolina (98011); Tennessee (02094); USDA Soil Import License (S-30027). For more information visit
our web site at: asi-lab.com

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ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Milliken & Co. - Live Oak
300 Lukken Industrial Dr. W
LaGrange, GA 30240

Attention: Ms. Mary C. Crenshaw
Report No. 157142-1

May 30, 2002

Sample Description
Milliken & Co. - Live Oak
Product, S-02096, received 05/21/2002

Analytical Method	Analyte	Result	Detection Limit	Units
	PCB's			
EPA 8082	PCB 1016	BDL	50	ug/kg
EPA 8082	PCB 1221	BDL	50	ug/kg
EPA 8082	PCB 1232	BDL	50	ug/kg
EPA 8082	PCB 1242	BDL	50	ug/kg
EPA 8082	PCB 1248	BDL	50	ug/kg
EPA 8082	PCB 1254	BDL	50	ug/kg
EPA 8082	PCB 1260	BDL	50	ug/kg

Analytical Services, Inc.

Quality Control

Report No. 157142

**PCB's by Method EPA 8082
Spike Recovery**

Batch # 79670

Matrix : Solid

Lab Control Information Analyte	LC %Rec	LCD %Rec	LC/LCD RPD	%Recovery Range	RPD Range
PCB 1016	80	81	1	75 - 111	0 - 19
Note : MS WITHIN 3 STD					
PCB 1260	83	84	1	73 - 111	0 - 22
Matrix Spike Information Analyte	MS %Rec	MSD %Rec	MS/MSD RPD	%Recovery Range	RPD Range
PCB 1016	66	58	3	57 - 108	0 - 36
Note : MS WITHIN 3 STD					
PCB 1260	71	80	11	47 - 124	0 - 54

Analytical Services, Inc.

Quality Control

Report No. 157142

PCB's by Method EPA 8082
Surrogate Recovery

Batch # 79670

Matrix : Solid

% Recovery Objectives

Surrogate #	Surrogate Name	Surrogate Range
S1	Tetrachloro-m-xylene	40 - 125
S2	Decachlorobiphenyl	40 - 152

Sample	File	S1	S2	S3	S4	S5	S6
156870-1	051702007B	59	220				
Note: NO REPORT, NEED CLEANUP, S1 PASS							
156870-1MS	051702008B	68	197				
Note: NO REPORT, NEED CLEANUP, S1 PASS							
156870-1MSD	051702009B	56	219				
Note: NO REPORT, NEED CLEANUP, S1 PASS							
156897-1	051702006B	59	78				
79670BLK	051702003B	80	98				
79670LCS	051702004B	77	97				
79670LCSD	051702005B	81	97				
156870-1MSDRA	052002005B	48	193				
Note: REPORTED, TBA, PASS ON S1							
156870-1MSRA	052002004B	49	172				
Note: REPORTED, TBA, PASS ON S1							
156870-1RA	052002003B	49	210				
Note: REPORTED, TBA, PASS ON S1							
157142-1	052302004B	15	28				
Note: S1/2 LOW, NOT REPORTED, NEEDS RR							
DAYBL05/22	052302003B	76	92				
157142-1RR	052402005B	42	54				
Note: REPORTED							
157231-1	052402004B	65	86				
DAYBL05/23	052402003B	55	90				

Analytical Services, Inc.

Quality Control

Report No. 157142

PCB's by Method EPA 8082
Blank Results Information

Batch # 79970

Matrix : Solid

Analyte	Blank Hits	Lowest Sample Det. Limit	Units
PCB 1016	None	50	ug/kg
PCB 1221	None	50	ug/kg
PCB 1232	None	50	ug/kg
PCB 1242	None	50	ug/kg
PCB 1248	None	50	ug/kg
PCB 1254	None	50	ug/kg
PCB 1260	None	50	ug/kg

Analytical Services, Inc.

Quality Control

Report No. 157142

PCB's by Method EPA 8082
Sample Batch Information

Batch # 79670

Matrix: Solid

Sample ID	Preparation			Notes	Analysis			Inst #
	Date	Time	By		Date	Time	By	
79670BLK	06/17/02	0900	DJ		05/17/02	1402	WAB	GC4
79670LCS	05/17/02	0900	DJ		05/17/02	1418	WAB	GC4
79670LCSD	05/17/02	0900	DJ		05/17/02	1434	WAB	GC4
156870-1	05/17/02	0900	DJ		05/17/02	1507	WAB	GC4
156870-1MS	06/17/02	0900	DJ		05/17/02	1523	WAB	GC4
156870-1MSD	05/17/02	0900	DJ		05/17/02	1539	WAB	GC4
156897-1	05/17/02	0900	DJ		05/17/02	1451	WAB	GC4
DAYBL05/22	05/22/02	1300	DJ		05/23/02	0741	WAB	GC4
156870-1MSDRA	//			PASS ON S1	05/20/02	0835	WAB	GC4
156870-1MSRA	//			PASS ON S1	05/20/02	0819	WAB	GC4
156870-1RA	//			PASS ON S1	05/20/02	0802	WAB	GC4
157142-1	05/22/02	1300	DJ		05/23/02	0757	WAB	GC4
DAYBL05/23	05/23/02	0930	DJ		05/24/02	0659	WAB	GC4
157142-1RR	05/23/02	0930	DJ		05/24/02	0731	WAB	GC4
157231-1	05/23/02	0930	DJ		05/24/02	0715	WAB	GC4

MONTENAY BAY LLC



RECEIVED

AUG 29 2002

BUREAU OF AIR REGULATION

MBLLC/DEP-02-101

August 28, 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 00502, Cushion Tile Products

Dear Mr. Fancy:

Per an email to Bruce Mitchell, I am submitting for consideration a waste stream consisting of carpet manufacturing remnants, Cushion Tile Products, per section A.5.1.6.(f) of permit, manufactured by Milliken Carpet. Amount delivered would be 350 tons per month, if approved. Enclosed, please find eight pages of additional information.

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 Bruce Mitchell, FLDEP

COMMERCIAL MARKETS
Modular/Custom

300 Lukken Industrial Dr. W.
LaGrange, Georgia USA 30240
800. 241. 4826 TOLL FREE
706. 880. 5338 FAX

Jon Williamson
Milliken & Co.
Liveoak Complex
300 Lukken Industrial Dr.
LaGrange, Ga. 30240
706-880-5922 Phone

Milliken Carpet

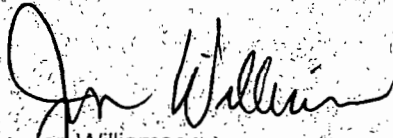
August 15, 2002

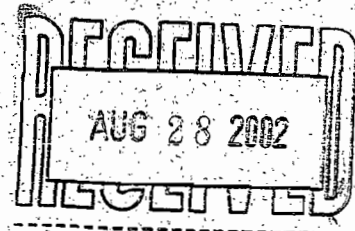
Montenay Power Corporation
Route 8, Box 757
Lake City, Fl. 32055

Dear Mr. Bennett:

Pursuant to a request from Montenay Power Corporation concerning the status of PCBs or PVC in our cushion tile products, we sent our tile products for testing. The lab results didn't show any detectable quantities of either PCBs or PVC. The test results are attached. I hope this addresses all of your concern. If you have further questions, please call me at 706-880-5922!

Sincerely,


Jon Williamson
Development Manager




MILLIKEN



Chris Kirk
08/13/2002 10:10 AM

To: Jon Williamson, Mary Crenshaw
cc:
Subject: Gold and Midnight Carpet Tiles

MILLIKEN RESEARCH CORPORATION, ANALYTICAL CHEMISTRY DEPARTMENT

Request No.: 20441
Date Submitted: 5/22/2002
Date Reported: 6/13/2002

Submitted By: Jon Williamson
Location: Rex Labs M-003

Processed By: Chris Kirk (M-425, X-1688)

Subject: Gold and Midnight Carpet Tiles

Background and Work Requested:

look for PVC on one of these carpet squares (they are all the same type).

Samples Evaluated:

1. midnight sparkle a-02096

Results and Conclusions:

Infrared analysis of the tiles showed a Polyurethane foam, and a Styrene/Butadiene primary adhesive filled with Calcium Carbonate in both samples.

We were unable to see any evidence of PVC.



ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis

110 Technology Parkway Norcross, GA 30092

(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Report Number **157142**

Prepared For:

Milliken & Co. - Live Oak

300 Lukken Industrial Dr. W

LaGrange, GA 30240

Attention: Ms. Mary C. Crenshaw

May 30, 2002

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Project Manager

Quality Assurance

cc: Mr. Glenn Stoner

Analytical Services Inc., Norcross Laboratory maintains the following certifications, approvals, and accreditations: Georgia (912); NELAC (E87315) scope: CWA, SDWA, RCRA expires July 1, 2002; NSF International (04160) scope: SDWA expires August 17, 2002; Arkansas; California (01180CA); Connecticut (PH-0250); Florida (E87318); Kansas (E-10334); Kentucky (80126); Louisiana (02089); New Jersey (GA001); New York (11762); North Carolina (381); Oklahoma (9907); South Carolina (86011); Tennessee (02894); USDA Soil Import License (S-30027). For more information visit our web site at: asi-lab.com

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ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis

110 Technology Parkway Norcross, GA 30092

(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Miliken & Co. - Live Oak
 300 Lukken Industrial Dr. W
 LaGrange, GA 30240

Attention: Ms. Mary C. Crenshaw
 Report No. 157142-1

May 30, 2002

Sample Description

Miliken & Co. - Live Oak
 Product, S-02096, received 05/21/2002

Analytical Method	Analyte	Result	Detection Limit	Units
PCB's				
EPA 8082	PCB 1016	BDL	50	ug/kg
EPA 8082	PCB 1221	BDL	50	ug/kg
EPA 8082	PCB 1232	BDL	50	ug/kg
EPA 8082	PCB 1242	BDL	50	ug/kg
EPA 8082	PCB 1248	BDL	50	ug/kg
EPA 8082	PCB 1254	BDL	50	ug/kg
EPA 8082	PCB 1260	BDL	50	ug/kg

Analytical Services, Inc.

Quality Control

Report No. 157142

**PCB's by Method EPA 8082
Spike Recovery**

Batch # 79670

Matrix : Solid

Lab Control Information Analyte	LC %Rec	LCD %Rec	LC/LCD RPD	%Recovery Range	RPD Range
PCB 1016 Note : MS WITHIN 3 STD	80	81	1	75 - 111	0 - 19
PCB 1260	93	94	1	73 - 111	0 - 22
Matrix Spike Information Analyte	MS %Rec	MSD %Rec	MS/MSD RPD	%Recovery Range	RPD Range
PCB 1016 Note : MS WITHIN 3 STD	56	58	3	57 - 108	0 - 35
PCB 1260	71	80	11	47 - 124	0 - 54

Analytical Services, Inc.

Quality Control

Report No. 157142

PCB's by Method EPA 8082
Surrogate Recovery

Batch # 79670

Matrix : Solid

% Recovery Objectives

Surrogate #	Surrogate Name	Surrogate Range
S1	Tetrachloro-m-xylene	40 - 125
S2	Decachlorobiphenyl	40 - 152

Sample	File	S1	S2	S3	S4	S5	S6
156870-1	051702007B	59	220				
Note: NO REPORT, NEED CLEANUP, S1 PASS							
156870-1MS	051702008B	68	197				
Note: NO REPORT, NEED CLEANUP, S1 PASS							
156870-1MSD	051702009B	56	219				
Note: NO REPORT, NEED CLEANUP, S1 PASS							
156897-1	051702006B	59	78				
79670BLK	051702003B	80	98				
79670LCS	051702004B	77	97				
79670LCSD	051702005B	81	97				
156870-1MSDRA	052002005B	48	193				
Note: REPORTED, TBA, PASS ON S1							
156870-1MSRA	052002004B	49	172				
Note: REPORTED, TBA, PASS ON S1							
156870-1RA	052002003B	49	210				
Note: REPORTED, TBA, PASS ON S1							
157142-1	052302004B	15	28				
Note: S1/2 LOW, NOT REPORTED, NEEDS RR							
DAYBL05/22	052302003B	76	92				
157142-1RR	052402005B	42	54				
Note: REPORTED							
157231-1	052402004B	65	86				
DAYBL05/23	052402003B	55	90				

Analytical Services, Inc.

Quality Control

Report No. 157142

PCB's by Method EPA 8082
Sample Batch Information

Batch # 79670

Matrix : Solid

Sample ID	Preparation			Notes	Analysis			Inst #
	Date	Time	By		Date	Time	By	
79670BLK	05/17/02	0900	DJ		05/17/02	1402	WAB	GC4
79670LCS	05/17/02	0900	DJ		05/17/02	1418	WAB	GC4
79670LCSD	05/17/02	0900	DJ		05/17/02	1434	WAB	GC4
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156870-1MSORA	//			PASS ON S1	05/20/02	0835	WAB	GC4
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