

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

April 17, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. James R. Kolanek Manager, Environmental Services Harris Semiconductor Post Office Box 883 Melbourne, Florida 32901

Dear Mr. Kolanek:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Harris Semiconductor to consolidate multiple permits previously issued for Building No. 57, which is a source involved with soldering and plating of integrated circuit parts.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.

Deputy Chief

Bureau of Air Quality

Management

CHF/BM/plm

Attachments

cc: C. Collins, CF Dist.

L. R. Hutker, P.E., HS

BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of Application for Permit by:

Harris Semiconductor Post Office Box 883 Melbourne, Florida 32901 DER File No. AC 05-161706

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Harris Semiconductor, applied on March 6, 1989, to the Department of Environmental Regulation for a permit to consolidate multiple permits previously issued for Building No. 57, which is a source involved with soldering and plating of integrated circuit parts. The proposed project will occur at the applicant's existing facility located in Melbourne, Brevard County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the For the purpose of this rule, affected. "publication in a newspaper of general circulation in the area affected" publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action:
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.
- If a petition is filed, the administrative hearing process is to formulate agency action. Accordingly, Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform to the specified above and be filed (received) within requirements 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.

Deputy Chief

Bureau of Air Quality

Management

Copies furnished to:

C. Collins, CF Dist.

L. R. Hutker, P.E., HS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 4-19-89.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to \$120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

northa Mille

Date

:

State of Florida Department of Environmental Regulation Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Harris Semiconductor, Post Office Box 883, Melbourne, Florida 32901, to consolidate multiple permits previously issued for Building No. 57, which is a source involved with soldering and plating of integrated circuit parts. The proposed project will occur at the applicant's existing facility in Brevard County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.
- If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the

Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the The petition must conform to the requirements proceeding. specified above and be filed (received) within 14 days publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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

Department of Environmental Regulation Bureau of Air Quality Management 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation Central Florida District 3319 Maguire Blvd., Suite 232 Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation and Preliminary Determination

Harris Semiconductor Brevard County Palm Bay, Florida

Construction Permit Numbers: AC 05-161706

Florida Department of Environmental Regulation Division of Air Resources Management Bureau of Air Quality Management Central Air Permitting

I. Application

A. Applicant

Harris Semiconductor Post Office Box 883 Melbourne, Florida 32901

B. Project and Location

The applicant has applied for a construction permit for Building No. 57 in order to consolidate multiple permits previously issued for this source/building.

The existing facility is located on Palm Bay Road, City of Palm Bay, Florida. The UTM coordinates are Zone 17, 538.7 km East and 3100.9 km North.

C. Process and Controls

1. Building 57

The primary manufacturing operations in Building 57 are soldering and plating of integrated circuit parts. Exhausted equipment includes wave soldering machines, wet stations, chemical storage cabinets, and vapor phase reflow systems.

The building houses five wet stations, four of which contain acid vats. The fifth is a water rinse station. Three of the four acid stations contain heated vats. No covers are used on the vats.

Scrubber number F57S01 treats caustic and corrosive contaminated exhaust generated from the above mentioned equipment. The scrubber is located; on the roof of the building.

2. General

A material balance scheme will be used to account for the annual VOC/solvent emissions released into the atmosphere by the building/source and facility. A program of sampling and analysis will be used to assess the VOC/solvent emissions from each building/source.

The Standard Industrial Classification Codes are:

- o Major Group 36: Electrical and Electronic Machinery, Equipment, and Supplies
- o Industry Group No. 367: Electronic Components and Accessories
- o Industry No. 3674: Semiconductors and Related Devices

Best Available Copy

- 5 3 Source Classification Codes are: Major Group 36
- o Cold Solvent Cleaning/Stripping
- po Building 57 4-01-003-99 Tons VOC/solvent consumed

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4.

The application package was deemed complete on March 6, 1989.

The existing facility is located in an area designated attainment for all pollutants.

Since the facility is not one of those contained in Table 500-1, F.A.C. Chapter 17-2, the VOC/solvent threshold for triggering new source review pursuant to F.A.C. Rule 17-2.500(5) is 250 TPY.

The following table presents the projected potential VOC/solvent emissions from Building No. 57:

Table 1

Source	Potential VOC/solvent Emissions (TPY)
Building 57	
o F57S01	1.66

Note: Annual hours of operation at 8760.

The following table presents the projected potential VOC/solvent emissions from the entire facility:

Table 2

Building	Potential VOC/solvent Emissions (TPY)
4	10.96
51	33.29
54	95.65
57	1.66
58	3.24
59	0.50
60 61	trace
61	0.25
62	0.83
63	<u>6.14</u>
	Total: 152.50

Note: Annual hours of operation at 8760.

Since the potential emissions are less than 250 TPY for the facility, the potential emissions projected from Building 57 will be reviewed pursuant to F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

Since there is no specific emission limiting standard contained in F.A.C. Rule 17-2.600 nor is there any standards of performance for new stationary sources contained in F.A.C. Rule 17-2.660, the source/Building 57 will be permitted in accordance with F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards.

In F.A.C. Rule 17-2.620(1)(a), no person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Pursuant to F.A.C. Rule 17-2.620(2), no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. Objectionable odor is defined as any odor present in the outdoor atmosphere which, by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance according to F.A.C. Rule 17-2.100(132).

The building operations/source is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation - Problems.

III. Summary of Emissions

A. Emission Limitations

The regulated pollutant emissions from this building/source are VOC/solvents in accordance with F.A.C. Rule 17-2.620.

Specific acid solutions are also being used during the manufacturing operations. There are no specific emission limiting standards for these specific acids. However, the acid vapors will be scrubbed to reduce emissions.

The following table presents the maximum allowable VOC/solvent emissions and the potential acid vapor emissions from Building 57 in TPY:

Table 3

Building	Maximum Allowable VOC/Solvent Emissions	Potential Acid Vapor Emissions
	1 7	
Note: Annual	hours of operation at 8760	0.2

Note: Annual hours of operation at 8760.

The permitted emissions are in compliance with all requirements of F.A.C. Chapters 17-2 and 17-4.

B. Air Quality Impacts

From the technical review of the application packages and supplementary material, an air quality analysis was not required.

V. Conclusion

A system of material balance and sampling/analysis will be used to account for and verify pollutant emissions from the facility and each building/source and their scrubber systems.

Based on the information provided by Harris Semiconductor, the Department has reasonable assurance that the consolidation of multiple permits previously issued for this source/building, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Harris Semiconductor
P. O. Box 883
Melbourne, Florida 32901

Permit Number: AC 05-161706 Expiration Date: April 30, 1990

County: Brevard

Latitude/Longitude: 28° 01' 20" N

80° 36' 10" W

Project: Building 57

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the permitting of Building 57, which is a source whose primary manufacturing operations are soldering and plating of integrated circuit parts. The scrubber control system is:

o F57SOl: a Tri Mer Corp. 13,500 cfm horizontal counter-flow mist eliminator using polypropylene filter packing for caustic and corrosive vapor removal; Model No. F/W 5.

The building/source is located at the permittee's existing facility located on Palm Bay Road in the City of Palm Bay. The UTM coordinates are Zone 17, 538.7 km East and 3100.9 km North.

The Source Classification Codes are: Major Group 36 o Cold Solvent Cleaning/ 4-01-003-99 Tons VOC/Solvent Stripping Consumed

The source shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

- 1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and Mr. James R. Kolanek's cover letter received March 6, 1989.
- 2. Technical Evaluation and Preliminary Determination dated April 14, 1989.

Permit Number: AC 05-161706 Expiration Date: April 30, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

Permit Number: AC 05-161706 Expiration Date: April 30, 1990

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:
 - a. a description of and cause of non-compliance; and
 - b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

Permit Number: AC 05-161706 Expiration Date: April 30, 1990

GENERAL CONDITIONS:

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

- 9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
- 13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Compliance with New Source Performance Standards
- 14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

Permit Number: AC 05-161706 Expiration Date: April 30, 1990

GENERAL CONDITIONS:

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration maintenance records and all original strip recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

- 1. The maximum allowable VOC/solvent emissions from Building No. 57 shall be 1.7 tons per year.
- 2. The VOC/solvent vapor exhaust scrubber must be on during the working hours.
- Permitted hours of operation are 8760.
- 4. Objectionable odors shall not be allowed off plant property.

PERMITTE:: Permit Number: AC 05-161706
Harris Semiconductor Expiration Date: April 30, 1990

SPECIFIC CONDITIONS:

5. An inspection and maintenance plan shall be submitted to the DER's Central Florida District office as part of the operating permit application. The plan shall include provisions for the prevention and correction of VOC/solvent losses from leaks and equipment malfunctions.

- 6. By March 31 of each calendar year, an annual operating report shall be submitted to the DER's Central Florida District office demonstrating compliance with the VOC/solvent emissions limit for Building No. 57. The emissions shall be determined by a material balance scheme, verifiable on a monthly basis, and shall include the following:
- a) a beginning inventory of full containers, cylinders and storage tanks at the beginning of each calendar year;
- b) plus all purchased deliveries after the beginning inventory (verifiable by invoices);
- c) minus all quantities picked-up and shipped-off the premise after the beginning inventory (verifiable by invoices);
- d) minus all quantities deep well injected during the calendar year, justified by assumptions and established scrubber efficiencies; and,
- e) minus an ending inventory of full containers, cylinders, and storage tanks.
- 7. The scrubber system's efficiency and potential VOC/solvent emissions shall be established by a sampling and analysis program, which includes:
- a) a sample shall be taken annually from each scrubber stack and analyzed using EPA Reference Method 25 or, with Department approval, EPA Reference Method 25A, 40 CFR 60, Appendix A;
- b) the DER's Central Florida District office shall receive 15 days notice in writing prior to sampling; and,
- c) the report, summarizing the sampling results, shall be submitted to the DER's Central Florida District office within 45 days after the last test run is completed.
- 8. This permit will supercede all other permits previously issued on this source/Building No. 57.
- 9. The source/Building No. 57 is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4.

Permit Number: AC 05-161706 Expiration Date: April 30, 1990

SPECIFIC CONDITIONS:

- 10. Projected potential acid emissions are 0.2 TPY.
- 11. Building No. 57 is subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation Problems.
- 12. Any modification pursuant to F.A.C. Rule 17-2.100(119), Modification, shall be submitted to the DER's Central Florida District office and the Bureau of Air Quality Management office for approval.
- 13. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
- 14. An application for an operation permit must be submitted to the Central Florida District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this	day
of	, 1989
STATE OF FLORIDA OF ENVIRONMENTAI	
Dale Twachtmann	Secretary

ATTACHMENT 1

Available upon Request